

WEST BERKSHIRE LOCAL PLAN REVIEW 2022-2039

Proposed Submission (Regulation 19)
Representations by plan order



West Berkshire
COUNCIL

Representations by plan order

1 Introduction and Background

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hertfordshire County Council
Consultee Full Name	Hertfordshire County Council
Consultee Organisation	Hertfordshire County Council
Agent Full Name	
Agent Organisation	
Comment ID	PS35
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	07/02/2023 12:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	You will no doubt be pleased to know that Hertfordshire County Council has no comment to make on your Local Plan Review.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Brimpton Parish Council
<p>Consultee Full Name</p>	Brimpton Parish Council
<p>Consultee Organisation</p>	Brimpton Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS54
<p>Chapter / Policy / Appendix Number</p>	1
<p>Chapter / Policy / Appendix Title</p>	Introduction and Background
<p>Order</p>	2
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	13/02/2023 13:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Brimpton Parish Council have reviewed the Consultation on the West Berkshire local plan review 2022-2039 and have no comment to make.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Transport for London
Consultee Full Name	Mr Richard Carr
Consultee Organisation	TFL
Agent Full Name	
Agent Organisation	
Comment ID	PS61
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/01/2023 15:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	Thank you for consulting Transport for London (TfL). I can confirm that we do not wish to make any representations on the Local Plan.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Coal Authority
<p>Consultee Full Name</p>	Coal Authority

Consultee Organisation	Coal Authority
Agent Full Name	
Agent Organisation	
Comment ID	PS97
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/01/2023 07:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As West Berkshire Council lies outside the defined coalfield, the Coal Authority has no specific comments to make on any stages of your Local Plan process.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bracknell Forest Council
Consultee Full Name	Bracknell Forest Council
Consultee Organisation	Bracknell Forest Council
Agent Full Name	
Agent Organisation	
Comment ID	PS217
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 12:47:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>For context, the position with the Bracknell Forest Local Plan (BFLP) is set out below.</p> <p>The emerging BFLP is at an advanced stage. It covers the period 2020-2037 and was submitted for examination on 20 December 2021. Stage 1 hearing sessions were held between 10th May and 15th June 2022 and Stage 2 hearing sessions were held between 18th and 20th October 2022. The Inspectors' post hearings letter was received on 19th January 2023 and outlines a series of Main Modifications that will need to be the subject of public consultation later this year.</p> <p>The majority of development planned in the BFLP is in Bracknell Town, with some smaller strategic and small site allocations. Parts of the Borough are highly constrained by land ownership (such as Crown Land), ecological constraints (such as the Thames Basin Heath Special Protection Area), policy constraints (such as Green Belt) and other constraints (such as surface water flooding).</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Copas, David
Consultee Full Name	David Copas
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS133
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 11:36:00
Attached Files	David Copas Full response_Redacted.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p><i>Extract of response relevant to consultation point:</i></p> <p>Democratic Process and Timing</p> <ul style="list-style-type: none"> • The consultation, selections process and appraisals have all been severely flawed, lacking in evidence • The decision making is undemocratic by failing to obtain full council sign off after Regulation 19 consultation and before submission to the Secretary of State • Government consultation for the NPPF is currently underway, is likely to reduce housing requirements for councils and WBC are acting recklessly by proceeding when they should pause the development of the local plan • Number of houses for NE Thatcham is now “at least 1,500” – From an initial site assessment of 2,500 of which 1,250 were to be built in the Plan period, this has now in fact increased to 1,500 <p>Specific Objections : WBC's process and timings</p> <p>Government consultation on the NPPF</p> <p>The NPPF consultation launched in December 2022 runs until 2nd March, 2023. The Consultation Version of the NPPF sets out that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan) will be advisory not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking into account the character of an area when assessing how much housing can be accommodated.</p> <p>Therefore it is unacceptable that West Berkshire are continuing to consult on the current version of the local plan, that councillors did not require the final version of the plan to be brought back to them for before it is submitted to the Planning Inspectorate for examination.</p> <p>On the back of this announcement, several Local Authorities have paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned</p> <p>We feel that the council should take the opportunity, as others have, to pause the plan making and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.</p> <p><i>For full response see attachment David Copas Full Consultation Response.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reynolds, Deborah
Consultee Full Name	Deborah Reynolds
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS138
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 11:36:00
Attached Files	Deborah Reynolds Full response_Redacted.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p><i>Extract of response relevant to consultation point:</i></p> <p>Democratic Process and Timing</p> <ul style="list-style-type: none"> • The consultation, selections process and appraisals have all been severely flawed, lacking in evidence • The decision making is undemocratic by failing to obtain full council sign off after Regulation 19 consultation and before submission to the Secretary of State • Government consultation for the NPPF is currently underway, is likely to reduce housing requirements for councils and WBC are acting recklessly by proceeding when they should pause the development of the local plan • Number of houses for NE Thatcham is now “at least 1,500” – From an initial site assessment of 2,500 of which 1,250 were to be built in the Plan period, this has now in fact increased to 1,500 <p>Specific Objections : WBC's process and timings</p> <p>Government consultation on the NPPF</p> <p>The NPPF consultation launched in December 2022 runs until 2nd March, 2023. The Consultation Version of the NPPF sets out that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan) will be advisory not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking into account the character of an area when assessing how much housing can be accommodated.</p> <p>Therefore it is unacceptable that West Berkshire are continuing to consult on the current version of the local plan, that councillors did not require the final version of the plan to be brought back to them for before it is submitted to the Planning Inspectorate for examination.</p> <p>On the back of this announcement, several Local Authorities have paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned</p> <p>We feel that the council should take the opportunity, as others have, to pause the plan making and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.</p> <p><i>For full response see attachment Deborah Reynolds Full Consultation Response.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Central Corporation Projects Ltd (Represented by Bell Cornwell)
Consultee Full Name	Central Corporation Projects Ltd
Consultee Organisation	Central Corporation Projects Ltd
Agent Full Name	Michael Cole
Agent Organisation	Bell Cornwell LLP
Comment ID	PS685
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p><i>Extract of representation relevant to consultation point</i></p> <p>We note that Proposed Submission Regulation 19 Local Plan review was presented to Full Council on 1 December, and the decision taken at that meeting to move towards public consultation. Yet the HELAA report was not published until January 2023; having not been updated since December 2020. As such, the decision appears to have been taken to finalise the selected allocations for inclusion in the LPR, prior to finalisation of the HELAA site assessments. This raises doubts as to the soundness of the proposed allocations, given members could not have had a full appreciation of the range of options available for allocation.</p> <p>Other key parts of the evidence base have also been finalised and published after final decisions were taken on the strategy and proposed allocations, including:</p> <ul style="list-style-type: none"> • Air Quality Assessment – published Jan 2023 • Employment Background Paper – published January 2023 • Flood Sequential Test Report – published January 2023 • Housing Background Paper – published January 2023 <p><u>Errors in evidence base</u></p> <p>It is also unfortunate to note that there are errors within the evidence base documents, which could contribute to a finding that the LPR is unsound. We shall not detail these in full, but by way of example:</p> <ul style="list-style-type: none"> • Site Selection Methodology, published January 2023, refers in paragraph 1.1 to the plan covering the period up to 2037 – which of course should be 2039; • The Air Quality Assessment, published January 2023, is based on a plan period up to 2037, so has not assessed pollutant concentrations for the full plan period. The post script on page 10 notes that fact that the plan period has extended out to 2039 following production of the draft assessment, and that once the revised transport model forecasts for 2039 become available, further analysis will be required to confirm there are not significant differences from the assessment which is based on a plan period up to 2037. That work should be carried out prior to the Regulation 19 consultation and submission to Independent Examination.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	Yes

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	<i>To discuss matters in dispute relating to Policy RSA10 in respect of the area of allocation and, density and quantum of development.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Canal & River Trust
Consultee Full Name	Mrs Jane Hennell
Consultee Organisation	Canal & River Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS417
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economics, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterway and promoting their use we believe we can improve the wellbeing of our nation.</p> <p>The Kennet & Avon Canal runs broadly west to east through West Berkshire and is a well-loved, multi-functional asset, bring numerous benefits to the local area. The canal is clearly recognised as such by the Local Authority and the Trust notes that most of our comments made during earlier phases of the consultation process have been included in the submission draft, thank you. The Trust is supportive of the plan and finds it sound and legally compliant. We have no need to attend the Examination. We look forward to continuing to work with the Local Authority to promote, protect and improve the canal corridor for the benefit of both local residents and visitors to the area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Finally, it is noted that the canal is incorrectly named at several other locations. At Para 5. 71 and Para 12.130 the name of the Kennet & Avon Canal is incorrect. The 'and' should be replaced by an ampersand.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Town Council
Consultee Full Name	Mr Hugh Peacocke
Consultee Organisation	Newbury Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS572
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 10:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The Planning and Highways Committee of this Council considered the above matter on Monday 20 February.</p> <p>The meeting was pleased that the Planning Authority had given reasonable consideration and weight to many of the responses that the Council made to the Regulation 18 Consultation. However, members expressed concerns that the entire Review process was flawed, due to inaccurate information and proposed changes to the National Planning Policy Framework (NPPF).</p> <p>As notified previously, the meeting resolved that Newbury Town Council supports the motion going to the Extraordinary Meeting of West Berkshire Council on 2 March 2023 and calls on West Berkshire Council to:</p> <p>1) Abandon the consultation on the Local Plan which commenced on the 20th of January 2023, so that all relevant issues can be rectified and/or clarified and thereby avoid the risk of the Local Plan Review submission being dismissed as unsound by the Inspector on the basis of a defective Regulation 19 Consultation: and</p> <p>2) Undertake a new Regulation 19 Consultation in the future once these omissions and errors have been rectified.</p> <p>I was directed to send this resolution to west Berkshire Council.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS628
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf PS628 Paula Saunderson - Chichester Case Study PS628 Paula Sanderson - Chichester Local Plan Structure.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</i></p> <p>CHPT 1 - INTRODUCTION & BACKGROUND</p> <p>I am an Ordinary Resident living in a small back-to-back house facing the River Lambourn in Clayhill Ward of Newbury. My 40 year old property is now at High-Risk of Surface Water Flooding (Pluvial) and although not showing on the EA Flood Maps my Fluvial Risk is rising due to continued development over Bourns upstream and degeneration of the Spatial Flood Defence (SFD) – non manmade River Banks- outside my only entrance door. My family goes back to at least the 1800s and I have lived in 5 villages and 2 of the Towns in West Berks.</p> <p>During my Career as a Senior Change & Transition Manager in FTSE 100 Company and then as a self-employed Consultant I have also lived and worked in other areas of the UK including Surrey, Cheshire, Oxfordshire, Hampshire, Devon, Scotland -Central & Highlands, and commuted all over England.</p> <p>I also ran a function within a major bank to rationalise the Branch Network for the Thames Valley region which stretched from Banbury to Godalming and Slough to Marlborough so know this part of the Southeast quite well.</p> <p>I am a Newbury Clayhill Ward Flood & Drainage Warden, a member of the Lambourn Valley Flood Forum, a member of the Working Party to look at the Lower Reaches of the R. Lambourn SAC/SSSI, and a lay member of the newly formed Newbury Flood & Drainage Action Group.</p> <p>I also run an informal Project which makes comparisons across a basket of about 12 Local Authorities that are of mixed design and size– County, District, Borough, Parish, Unitary etc., and we are currently looking at Local Plan preparation. We find Plans such as Chichester (similar in demographics), Cheshire East, Eastleigh & Lancaster much easier to navigate and understand,</p> <p>I have been a Parish Councillor in Hamble-le-Rice based on the River Hamble.</p> <p>I am not averse to change however I do want to ensure that key Environmental factors are considered in the best way possible for Newbury as a main centre in what will become an increasing large and denser area with not much clarity around basics like Building heights and styles which are suitable for the nearby Communities.</p> <p>I am wary about Building in or near the significant Flood Risk Areas within Newbury Clayhill Ward and do not think enough attention is given to building near or over our natural watercourses and seasonal Groundwater fed Bourns. Hence, I am taking the time to submit this response.</p> <p>If any statements I make are factually incorrect then this is probably because I am not trained in Planning Law or it is not always easy to find Maps & Documents that are relevant to the main Sub-Area of this Plan, which for me is the Settlement of Newbury.</p> <p>CONTEXT</p> <p>I am concentrating on the Newbury Area which should be considered as a Sub Area within the Spatial Strategy Area known as Newbury & Thatcham Area, and the Map of the Settlement Boundary for the Newbury Area is below. Unfortunately understanding the Boundaries is difficult as all the Boundaries differ.</p> <p>Newbury Town Council Boundary is different to the Newbury Unitary Wards which appear to be different to the Newbury Settlement Boundary and the Landscape Character Assessments and the study areas within the Appropriate Countryside Designations/Green Gaps Study guide used within the Evidence Base.</p> <p>This makes evaluating the future for Newbury very difficult and means making Parish level responses to Planning Applications and Local Plans more complex.</p> <p>What is evident from this plan is without clear lists of what is on the cards for the Newbury Settlement over the next 20 years it is impossible to say whether any of the Visions will become reality. Without being immersed in the detail and setting up our own spreadsheets it is impossible to say which Residential & Employment & Retail Sites for Newbury are included in which figures and how much of the residual requirements will be demanded within the Newbury Settlement.</p> <p>If the LPR is going to take a Spatial Area approach and concentrate Delivery and Implementation on the main Settlement Hierarchy, then the least that we can expect is clear projected Figures for the Major Town with detailed Tables behind them.</p> <p>Navigating the Contents & Structure</p> <p>In Terms of the <u>Contents & Structure</u> of this Submission and the ability of Planning Officers, Developers, Residents, and the Inspector to follow it and make sense of the 101 Policies within it, I think there are better and simpler Structured Plans out there which could be emulated. A re-cut Structure could lead to better Planning and Policy compliance for after adoption of this new Local Plan 2022-2039, and allow more logical feedback from Residents.</p>

Many of the Climate Change topics are scattered as are the Housing Policies and the Development Management Policies could be more logically grouped.

Case Study - Chester

[see attachment 'PS628 Paula Saunderson - Chichester Case Study' for diagram]

What is evident from this plan is without clear lists of what is on the cards for the Newbury Settlement over the next 20 years it is impossible to say whether any of the Visions will become reality. Without being immersed in the detail it is impossible to say which Residential & Employment & Retail Sites for Newbury are included in which figures and how much of the overall and residual requirements will be placed in the Newbury Settlement.

Within Chpt 7 there is no Strategic Policy for Retail and Commercial Space. I feel this is an omission and the subject is not adequately covered **under SP22 – Town & District Centres**.

Again, within Chapter 7 - which should read Economic & Employment Growth there is no Policy for Agriculture, Forestry and there are no DM Policies under Chapt.12. Apart from DM36 - Farm Diversification which is rather specific.

CHPT 9, 10, 11 & 12 – DEVELOPMENT MANAGEMENT POLICIES

I find these rather difficult to follow as they are not always logical under the headings they are under and I can quite understand why there is a huge turnover in Planning Officers. Developers & Planning Applicants either get round Policies or miss them in their presentation of their plans. The Checklists for Planning Applicants already needed updating and that need will be greater to make it easier for Planning Applicants to understand what Policies they need to comply with at Submission and Validation stage.

I do not intend to comment apart from the odd one below and I think that **Sustainable Drainage (SuDS)** must have a higher level Policy instead of being an SPD.

And I do think as a leading Tech Town and Area we may need a Policy around **Data Centres** which are highly resource hungry and would impact on Climate Change Targets.

And I would like to see something specific in the Planning framework to support the **Dementia Friendly** status that West Berks has.

The LPR is not very clear on its Terminologies in relation to the AONB, Rural & Countryside, and this is very evident in the suite DM Policies as these are all over the place for the Spatial Areas, and not grouped logically for anyone trying to ensure a Rural/Countryside/AONB Planning Application is compliant.

Evidence Base Documents

In Terms of the Evidence Base. There are late arriving Documents which have now been thrown out for input from Newbury Town Council or to Public Consultation, and some have been included without any input or consultation, and for me, that this renders the plan Unsound and not Positively Prepared as a Newbury resident. The fact that this Section 19 Consultation will not go back to Council before Submission does not give any confidence in this particular part of the process.

Examples of some of the Documents are as follows:

- Draft Local Transport Plan (LTP4) Strategy 2024-2039- launched 8th Feb 2023, ends 22nd march 2023
- Draft new Council Strategy 2023-2027 – launched 13th Jan 2023, ended 26th Feb 2023
- Draft Newbury Town Centre Conservation Area Appraisal & Management – launch 12th Jan 2023, ended 23rd Feb 2023. No input was sought from the Newbury Society during preparation.

And Key Documents such as the Appropriate Countryside Designations Studies (for Green Gaps) of which many border Newbury Settlement have not seen input from NTC Planning Committee, or asked the views of nearby Residents.

And I am totally surprised at how late in the whole LPR process the consideration of Green Gaps has been.

DEVELOPMENT STRATEGY: OUR PLACE BASED APPROACH

BACKGROUND

As the **NPPF** is under Review and a Public Consultation is underway it is difficult to place the Legality & Soundness of this plan in that Context. Whether this LPR will meet the NPPF & PPG going forward is unknown and as having this Plan with its many missing key Sites will not make any difference to the Planning Applications coming forward in 2023, I would prefer to see this Submission Delayed. This is mainly because I am concerned how and where the Employment to serve an extra 9000 Households will come from without a major increase in Commuting which is not catered for in the Plan.

I am also struggling to rationalise the contents of this Submission beyond this point and would have preferred to see the Document Structure in a clearer format such as in this Case Study below from Chichester Section 19 Submission.

[See attachment PS628 Chichester Local Plan Structure for diagram]

OTHER MATTERS

CONSULTATION DOCUMENTS

<https://www.westberks.gov.uk/media/>

[53945/Proposed-Submission-Regulation-19-West-Berkshire-Local-Plan-Review-to-2039-Clean-Version/pdf/](https://www.westberks.gov.uk/media/53945/Proposed-Submission-Regulation-19-West-Berkshire-Local-Plan-Review-to-2039-Clean-Version/pdf/)

[LPR_2022-2039_Proposed_Submission_for_consultation_20_Jan_2023_for_web.pdf?m=638096652954630000](https://www.westberks.gov.uk/media/53945/LPR_2022-2039_Proposed_Submission_for_consultation_20_Jan_2023_for_web.pdf?m=638096652954630000)

The West Berkshire Local Plan Review 2022-2039 Proposed Submission as a Document:

- Is poorly presented in terms of collecting information together relating to one Area so that we can see the likely impacts and numbers of Residential Dwellings & Employment space that is likely to exist within our Area by 2039. Many Local Plans at this stage have much clearer information for a specific Area and as Newbury is the dominant Town and Urban Area it fails to have an SP Policy for itself and is only considered in the context of SP1 – the Spatial Strategy.
- Chichester District LPR has similar demographic and spatial strategy to West Berks, yet it gives much more respect to its main town (Chichester City) as part of the Spatial Area it is within. <https://chichester.oc2.uk/document/45/459#d459>

CONSULTATION STATEMENT

<https://www.westberks.gov.uk/media/53795/>

[Proposed-Submission-LPR-Consultation-Statement/pdf/Consultation](#)

[Statement - Proposed Submission LPR Dec 2022 v2.pdf?m=638084385899730000](#)

The Consultation Statement, whilst detailed, does not appear to identify that during the Section 18 Consultation process or this Section 19 Consultation process there has not been a programme of Public Exhibitions in Areas of high impact. Such events are an opportunity for those that are not part of a Parish Council or are not Digitally enabled to participate. The Value of Story Boards and visual representations plus the opportunity to meet the Officers cannot be under estimated for the Ordinary Resident, including Parents, Environmental Studies School Pupils, Digitally Disabled, and the Elderly who are used to this type of Consultation

DUTY TO CO-OPERATE STATEMENT

<https://www.westberks.gov.uk/media/53787/>

[Duty-to-Cooperate-Statement-January-2023/pdf/LPR Interim DtC Statement](#)

[January 2023.pdf?m=638086137283470000](#)

The Duty to Co-operate does not include Town & Parish Councils however when it comes to Documents that are for a specific Town or Parish then Input and certainly better consideration during surveying and consultation would engender better relationships and quality.

EQUALITIES IMPACT ASSESSMENT

Inadequate for Key Sub Areas and Key Settlements and missing Sites that should be in the LPR.

HABITATS REGULATIONS ASSESSMENT

As a GI Framework is missing and these concentrate on International & National Designations there is no work on Local Nature Recovery Networks or complete Wildlife Corridors using non-designated Nature-based Public Open Space or Private Green Space.

POLICIES MAPS

The Policies Map is very detailed and small in scale. It does not appear to be GIS enabled and therefore does not have Post Code search facility.

The Area of Newbury is by its very nature quite crowded with colours and shaded areas which overlap. We need a detailed map for Newbury within a Sub-Area SP.

Had there been an SP Policy for Newbury and a Settlement Map - then residents would be able to comment more meaningfully on the contents of the maps and its implications for their lives.

STATEMENT OF THE REPRESENTATION PROCEDURE

The LPR 2022-2039 Section 19 Submission was not ready for Consultation and more time should have been taken to re-cut and re-format the Contents and Presentation before going to Consultation to enable meaningful Comment.

However, it is imperative that for ease of use afterwards that the Plan & Policies are restructured so that related Policies are collected together, and Planning Officers & Planning Applicants have a better chance of either complying and less opportunity to NOT comply.

SUSTAINABILITY APPRAISAL (SA)/ STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The Previous December 2020 Appraisals commented on how weak many of the current Plan Policies are. To strengthen Policies many now appear to be over-written and repeat information which is in the NPPF.

And you would have thought that the Consultants undertaking the Appraisals would have suggested a more logical Structuring of the Polices into groups where they relate to each other.

Not enough RSA & ESA Site Allocations for Newbury to make the plan Sound for Positive, Justified, and Effective.

None of the Key Mixed Sites are included such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, Old Magistrates Court and without these Key Sites and any specific Policy around them I form the Opinion that this Section 19 Consultation Version of the LPR 2022-2039 is Not Sound on the Basis that it has not been Positively Prepared, is Not Justified, and Not Effective.

The Plan omits Brownfield Sites which has favoured the Sandleford Greenfield site and the Plan is not Justified without the Inclusion of the Brownfield Sites that are clearly going to start development within the next 20 years.

Without clear Data for the Newbury Settlement in terms of numbers of provision overall it is not an Effective Plan as it stands.

	<p>EVIDENCE BASE</p> <p>Many Documents arrived late and caused a significant amount of extra work to Consultees who were already reviewing the Evidence Base prior to the slippage of dates for this Consultation. This has led to a view that the Plan has not been Positively Prepared.</p> <p>TIMESCALES FOR PREPARATION AND SUBMISSION TO THE INSPECTOR</p> <p>Overall the LPR 2022-2039 as it stands has been rushed, has significant gaps, and is not of a quality in terms of presentation that many other Local Planning Authority reviews are achieving. I do believe the Plan needs restructuring BEFORE Submission to the Inspector as I think they will be immediately frustrated by the poor presentation, lack of Sub Area detail and appraisal, and illogical grouping of Policies. If it were me I would throw it back.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Higgins, Glen
<p>Consultee Full Name</p>	Glen Higgins
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS272
<p>Chapter / Policy / Appendix Number</p>	1
<p>Chapter / Policy / Appendix Title</p>	Introduction and Background
<p>Order</p>	2
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	24/02/2023 14:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I should like to register my objection to West Berkshire Council's LPR of 2023 for several reasons. The most basic reason is that updated guidance on these matters is due to be published later this year by the government and if this plan is proceeded upon it may become outdated and open to legal challenges if implemented leading to delays and missed targets. It is anticipated that the government's required numbers of houses in each area will be reduced, which is most significant. The plan also contradicts the national guidelines on impact on AONBs.</p> <p>There is insufficient information about who provided the information used in preparing this report, who paid the costs and who put it together. The plan has no explanation as to how it will be enacted in the time span covered by the report.</p> <p>The LPR lacks detailed and transparent supporting evidence to the assumptions used. This is particularly vital regarding the numbers and types of housing needed in the future. With the lack of substantive detail it must be assumed that the any new estates will be the usual, high profit mix of executive and middle management houses. Given the current and foreseeable situation the biggest requirement must be affordable and social housing, true vision would provide a lot more of these types. The plans talk of a percentage of affordable housing but experience shows that the number of these reduce as developers find unforeseen profitability problems, the WBC roll over and a reduction in number is agreed. We should be catering for a high percentage of the types of housing all of the community need not just those with the income to buy.</p>

	<p>In the LPR there is no effective detail on mitigating the effects of the extra housing on the social, physical and environmental infrastructure. With the existing pressures on all of these no LPR can ignore this matter. The effects on traffic, schools, doctors, care homes, drainage, water supplies, education, countryside etc will be very significant. The plan does not address the need and cost for extra schools, GP surgeries, care provision, road improvements, new paths in local villages as commuting traffic increases. The roads around Newbury are already very busy and these plans will put extra traffic on all of the C roads as new rat runs to the motorway junctions become used.</p> <p>Any LPR should be looking at alternatives to simple large estates and there is no detailed confirmation this has been done. The capacity of smaller developments, brownfield sites, unbuilt planning permissions, and utility of other areas should all be quantified.</p> <p>All development plans should take into account their effect on the immediate and local communities. To provide large estates means smaller communities become one big urban sprawl to the detriment of living standards generally. For instance to enlarge Thatcham by 1500 to a potential 2500 would mean Thatcham, Newbury and local villages like Cold Ash and Upper Bucklebury run one into another. Having resisted closing the green gap between Thatcham and Newbury for this reason it is ridiculous to propose this many houses around North Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hoddinott, Keith
<p>Consultee Full Name</p>	Keith Hoddinott
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS490
<p>Chapter / Policy / Appendix Number</p>	1
<p>Chapter / Policy / Appendix Title</p>	Introduction and Background
<p>Order</p>	2
<p>Submission Type * E-Mail * Letter * Other</p>	Letter

* SMS * Web * Unknown	
Response Date	02/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Central Government should return some stronger planning powers & financial measures to Local Authorities, in order to facilitate the targets for new housing, particularly social (council) housing, which they wish to achieve The recent confusion & apparent lack of control over the developments adjacent to the A339 & Vodafone complex only highlights the need for robust implementation of existing legislation, but also to reinforce LA control through the enactment of Schedules 3 & 42 of the 2010 Water & Flood Management Act.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Williams, Tim
Consultee Full Name	Tim Williams
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS311
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	27/02/2023 23:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The health authorities have not been consulted in preparing this plan. The relevant water company has also not been informed about the plans.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	The proposal does not take account of the revised targets announced by Michael GOve in December.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	Neither the water supplier nor the local health authority have been involved in preparatio of this plan.
<p>4. Proposed Changes</p>	<ol style="list-style-type: none"> 1. The numbers of houses being built should be reconsidered in light of revised guidance 2. Thames Water need to be consulted and to produce plans to manage the water and sewage needs 3. The relevant local health bodies should e consulted with over the viability of health provision in the plan, 4. The plans for education facilities should be reconsidered in light of the government's advice and that of West Berkshire COuncil 5. A thorough ecological assessment should be completed before outline planning is granted 6. The transport plan needs to be more realistic and consistent with the council's own estimates.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	I am able to state the case in more detail
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

<p>publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jefferies, Sarah Jane
Consultee Full Name	Sarah Jane Jefferies
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS520
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	Web
Response Date	02/03/2023 15:01:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<p>i find the whole process designed to discourage comments - not user friendly</p> <p>my main concern is the lack of checks and balances to ensure the plan is implements to time and specification - too many times planning permission is given and nothing built, or social housing built but not occupied. This is not acceptable</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? -</p>	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Reading Borough Council
<p>Consultee Full Name</p>	Mark Worringham
<p>Consultee Organisation</p>	Reading Borough Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS529
<p>Chapter / Policy / Appendix Number</p>	1

Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>Reading Borough Council (RBC) works closely with West Berkshire District Council (WBDC) as well as other neighbouring authorities to consider strategic planning issues in the area. WBDC, RBC, Wokingham Borough Council and Bracknell Forest Council have co-operated on a Statement of Common Ground that details the situation regarding strategic matters across the area.</p> <p>RBC therefore welcomes the publication of the West Berkshire Local Plan Review Proposed Submission and supports the overall approach of the plan.</p> <p>We have some more detailed comments on some matters of strategic importance.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	WBDC has engaged on the plan throughout its preparation, and we consider that the duty to co-operate as far as RBC is concerned has been fulfilled.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North Wessex Downs AONB
Consultee Full Name	Rebecca Davies
Consultee Organisation	North Wessex Downs AONB
Agent Full Name	
Agent Organisation	
Comment ID	PS668
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:03:56
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1170
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<i>Duty to Cooperate - see below.</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Objection</p> <p>We understand the definition of the legal duty to co-operate. On the evidence available so far thus does not appear to have been adequately carried out. It is unfortunate that full details of the co-operation to date have not been given at this submission stage.</p> <p>Paragraph 1.26 of the LPR is wholly inadequate by means of explanation. It simply states that there is a close partnership to ensure that cross boundary issues are taken into account. However this is not evidenced by the Supporting Statement on the Duty to Co-operate.</p> <p>More details and further cooperation between Authorities would have been helpful and would have informed the Local Plan Review (LPR), and the responses to it, if full details could have been given.</p> <p>This is especially true on the subject of housing as the LPR deals with the Council's housing need but does not explain in detail how adjoining Authorities (such as Reading, Swindon and Wokingham) will require housing need to be met in West Berkshire District and if so what the quantum of that additional housing would be and where it would be located.</p> <p>Indeed the Duty to Cooperate Statement does little to assist. Reading BC is stated to need 230 houses outside its boundaries but the HMA has not been agreed and is subject to "further review" but this does not provide the certainty required by the LPR.</p> <p>Also West Berkshire apparently cannot meet its own employment needs. It is stated there may be a statement on this but "it needs further work".</p> <p>The HEELA does not include Bracknell Forest and a single study covering the Housing Market Area, which would have been the most appropriate approach for consistency, apparently "has not been practical" due to there being four different plan-making timetables.</p> <p>The LPR sets out a figure for overall housing need together with some sites but it may be that both of those aspects will need to be revisited in the light of further exercise of the duty to co-operate.</p>
<p>4. Proposed Changes</p>	Fully exercise the duty to cooperate and give details of the responses to the duty to co-operate as soon as possible so that the overall housing requirement figure and the sites needed to meet it can be addressed by the LPR.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	We do not consider the LPR is sound and would like to participate in the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dellow, John
Consultee Full Name	John Dellow
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS497
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 13:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	No

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Government consultation on the NPPF</p> <p>The NPPF consultation launched in December 2022 runs until 2nd March, 2023. The Consultation Version of the NPPF sets out that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan) will be advisory not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking into account the character of an area when assessing how much housing can be accommodated.</p> <p>Therefore it is unacceptable that West Berkshire are continuing to consult on the current version of the local plan, that councillors did not require the final version of the plan to be brought back to them for before it is submitted to the Planning Inspectorate for examination.</p> <p>On the back of this announcement, several Local Authorities have paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned We feel that the council should take the opportunity, as others have, to pause the plan making and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England

Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1198
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	Yes

* No	
Please give reasons for your answer	<p>Sustainability Appraisal:</p> <p>Page 9: the opening sentence in Table 4 in the row on historic character does not entirely make sense and needs minor editing i.e. "The conservation of historic, sites and commons, monuments, battlefields, parks, buildings and Conservation Areas has contributed..." Also within this row, we are uncertain about the rationale for including text on new development in the vicinity of nuclear installations and the influence of such development on nuclear safety. If there is a link to historic character, it needs to be made clearer.</p> <p>Page 15: we advise a minor change as follows to the subobjective to align more closely with the NPPF: "To protect or, conserve and enhance the built and historic environment including sustaining the significance significant interest of heritage assets"</p> <p>Page 15: there is a minor formatting issue – two bullets on heritage indicators have been merged. Within this merged entry, we particularly welcome the proposed indicator "% of Conservation Areas in West Berkshire with an up-to-date character appraisal (and management plan)".</p> <p>Pages 73 and 74: the SA refers to "heritage benefits" related to allocations RSA15 and RSA17-RSA22. These benefits need to be made clearer in the Plan for them to be realised.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p><u>The SA</u></p> <p>Page 15: we advise a minor change as follows to the subobjective to align more closely with the NPPF: "To protect or, conserve and enhance the built and historic environment including sustaining the <u>significance</u> significant interest of heritage assets"</p> <p><u>The Local Plan</u></p> <p>The heritage benefits associated with allocations RSA15 and RSA17-RSA22 need to be made clearer in the Plan for them to be realised.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst Parish Council
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst Parish Council
Agent Full Name	

Agent Organisation	
Comment ID	PS1665
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	General Observations: The aim of delivering carbon neutral by 2030 and thereafter is encouraging.

	<p>We welcome recognition of the outstanding value of the North Wessex Downs landscape and the abundant biodiversity in settlements and surrounding countryside.</p> <p>Policy wording changes generally improve the readability and effectiveness of the plan.</p> <p>Maps - Maps throughout the document have no scale. Some have no North indicator. Size of text makes crown copyright illegible.</p> <p>Policy wording - Some policies are more than a page long and contain multiple paragraphs. Paragraphs within policies are not numbered, making it difficult to precisely reference them.</p> <p>Housing and Economic Land Availability Assessment (HELAA) - This council is not aware that there has been any consultation on this modified HELAA. We have no record of contact or request for feedback.</p> <p>Local Plan Map - Too many layers are displayed simultaneously- it is impossible to accurately read detail on the map. For instance, the settlement boundary through Tilehurst Parish has been reviewed and (we believe) is largely unchanged- but we cannot accurately see what (if any) differences there are from the current settlement boundary. Without road detail displayed, the site of the proposed retail park designation in Calcot is unclear and we cannot comment on the detail of its proposed outline.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Wallis Trustees (Represented by Carter Jonas)
<p>Consultee Full Name</p>	Frank Wallis Estate Trustees
<p>Consultee Organisation</p>	Wallis Trustees
<p>Agent Full Name</p>	Steven Sensecall
<p>Agent Organisation</p>	Carter Jonas
<p>Comment ID</p>	PS1376
<p>Chapter / Policy / Appendix Number</p>	1
<p>Chapter / Policy / Appendix Title</p>	Introduction and Background
<p>Order</p>	2

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Representations have been submitted to the Local Plan at various stages setting out development proposals for the land east of Waller Drive, Newbury which could be achieved over the plan period. In addition, the wider site has been put forward for assessment by West Berkshire Council in the Housing and Economic Land Availability Assessment. Most recently representation was submitted to the Local Plan Regulation 18 stage 2 consultation in February 2021. A number of general points were made to the draft document and are summarised below as they inform our response to the current Regulation 19 Proposed Submission document: <ul style="list-style-type: none"> • Commentary about the plan's approach to housing delivery and supply and that the unambitious scale of growth fails to meet the identified housing need; • General support for the focus of growth towards the sustainable locations of Newbury and Thatcham; • Policy compliant development on land east of Waller Drive, Newbury.

A predicament in responding to the current draft (Regulation 19) Plan is the proposed change in Government policy with the publication of the proposed Revised Framework in December 2022 to replace the July 2021 document in line with the requirements of the "Levelling Up and Regeneration Bill: reforms to national planning policy". Annex 1 of the Revised Framework suggests that the Revised Framework is a material consideration from the date of its publication (paragraph 221), specifically for the consideration of planning applications.

Transitional arrangements are set out for the purpose of examining plans (paragraph 225), which confirm that for the purposes of the tests of soundness in paragraph 35, and the policy on renewable and low carbon energy and heat in plans in Paragraph 156, these policies apply only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (presubmission) stage, or that reach this stage within three months of the publication of the version. Therefore, the West Berkshire Local Plan will be considered for the purposes of soundness against the July 2021 version of the NPPF.

In responding to the current Regulation 19 consultation document reference is made to the requirement to assess whether the planning document has been prepared in accordance with the legal and procedural requirements and whether it is "sound" having regard to the provisions of paragraph 35, namely:

- 1 Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreement with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 2 Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3 Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- 4 Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Plans are required to set out strategic policies (NPPF paragraph 20) to address the priorities for development and use of land within the area, setting out an overall strategy for the patterns, scale and quality of development and make sufficient provision for housing and other development, with infrastructure to support it. NPPF paragraph 22 specifically states that such strategic policies should look ahead over a minimum period of 15 years from the date of adoption to plan for and anticipate long term requirements and opportunities. NPPF paragraph 23 outlines that such strategic policies should set out a clear strategy for bringing sufficient land forward to address objectively assessed need over the Plan period and should include planning for and allocating sufficient sites.

In considering the soundness of the Publication draft document, the following sets out our comments in relation to the Plan generally and then to the land east of Waller Drive, Newbury specifically. Overall, it is considered that the Local Plan Review is legally compliant as it complies with Sections 19 and 20 of the Planning and Compulsory Act 2004 (as amended)

Plan Period

Requirements in the NPPF seek a minimum 15-year period from the date of adoption. For a number of reasons, including resourcing in the authority and the availability of examining Inspectors, we are of the view that the Local Plan is unlikely to be adopted before the end of 2024 and that the proposed September 2024 adoption date in the Council's January 2023 Local Development Scheme is optimistic. Therefore, to ensure the plan period is consistent with national policy, it would be prudent for the Local Plan to seek an end date of 31st March 2040 and the strategic policies including housing requirement and Vision adjusted to this date accordingly.

It is considered that the draft Plan is not sound as it will not cover a minimum 15-year period from the date of adoption. Carter Jonas would therefore strongly urge the Council to review its position before proceeding with submission of the Local Plan Review for examination to review the economic and housing growth holistically and over an extended Plan period to ensure that this review of the Local Plan is found sound and delivers the required jobs and housing for its residents.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rectory Homes Ltd
Consultee Full Name	Steven Kerry
Consultee Organisation	Rectory Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS774
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:09:00
Attached Files	Rectory Homes REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As part of the supporting evidence to the emerging Local Plan Review, the Council have provided a signed statement of common ground with the other Berkshire authorities of: Reading Borough Council; Bracknell Forest Council; Royal Borough of Windsor and Maidenhead Council; Slough Council and Wokingham Borough Council. The statement further confirms that there is unmet housing need arising from Reading Borough Council. Despite acknowledging that housing needs and supply are a cross-boundary issue, no Council within the West Berkshire Housing Market Area have committed to delivering this shortfall within their authoritative boundaries.</p> <p>This unmet need is relatively small therefore there is no reason why these homes could not be delivered within the wider West Berkshire HMA. Given the lack of commitment to accommodate these homes, it is clear that there has not been effective cooperation between the relative authorities.</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Croudace Ltd (Represented by Nexus Planning)</p>
<p>Consultee Full Name</p>	<p>George</p>

	Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1509
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Croudace Homes Combined Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes
* No

Please give reasons for your answer

[See attached Combined Appendices for appendices. For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]

General Comments on the Local Plan Review

In general, Croudace applauds the Council for preparing and bringing forward the emerging LPR for consultation. Despite this, Croudace retains fundamental concerns with the strategy set out within the Regulation 19 stage LPR, specifically in relation to the following matters which are set out below within this and subsequent sections:

- 1 The plan period (from paragraph 3.25 and 5.9);
- 2 Addressing the unmet needs of neighbouring authorities (from paragraph 5.11);
- 3 The approach to addressing affordable housing needs (from paragraph 5.20);
- 4 The approach to addressing those with specialist housing needs (e.g. elderly) or wish to build their own home (from paragraph 5.25, again at paragraph 6.78 and again at 6.85);
- 5 The over-reliance on large strategic sites and/or those which require substantial new infrastructure (from paragraph 6.17);
- 6 The direction of growth to the North Wessex Downs AONB (from paragraph 6.49); g. The Council's overoptimistic assessment of its housing supply (from paragraph 6.59);
- 7 A lack of inherent flexibility within the plan to anticipate and accommodate future changes in circumstance (from paragraph 6.87);
- 8 The lack of consideration of reasonable alternatives, including the absence of allocation of the land at Henwick Park.

We also set out our recommended changes to make the plan 'sound' and 'legally compliant' in the Conclusion (Section 8).

Changes since the Regulation 18 Stage

We firstly note that the housing requirement has been reduced, from that set out at the Regulation 18 stage in December 2020 (575 dwellings per annum ('dpa')), to reflect the latest iteration of the standard method (April 2022) contained within PPG (513 dpa).

Whilst Croudace understands the rationale behind the change, it believes that the effect of the change represents an unambitious approach to plan-making; it will result in a significant reduction in the housing requirement at a time when there is an acute need for housing within West Berkshire. Therefore, Croudace urges the Council to revisit the housing requirement to help ensure the housing needs of all members of the community can be better met and ensure the plan meets the tests of soundness.

More positively, Croudace is pleased the LPR retains the ambition to direct growth to Thatcham, a highly sustainable 'top tier' settlement. It also welcomes the decision to reduce the draft allocation at North East Thatcham (Policy SP17) from 2,500 dwellings to 1,500 dwellings in principle.

We also note that a number of other previously proposed draft allocations in Thatcham have been removed from the plan and as a result, in combination with the reduction at North East Thatcham, the level of housing growth directed to Thatcham has reduced by up to 1,400 units. Likewise, 589 units have been removed from the allocations in the Eastern Area and 86 from the North Wessex Downs AONB

Plan Period

Paragraph 22 of the NPPF is clear that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

As currently drafted, the LPR covers the period 2022/23 to 2038/39. We note that the Council currently anticipates submission of the LPR to the SoS for Examination in March 2023. Therefore, to look forward a minimum of 15 years, the LPR would need to be adopted by the end of 2023/24. However, from our experience of Local Plan Examinations elsewhere, this would appear to be overly optimistic and highly unlikely to happen.

In our view, it would not be unreasonable to expect a period of at least 18 months more realistically from submission to adoption (to allow for Examination and consultation on Main Modifications etc.). This would place plan adoption at September 2024 (i.e. 2024/25) at the very earliest, which would reduce the remaining plan period down to 14 years.

Therefore, to ensure that the LPR is consistent with national policy, Croudace considers the Council must add at least one year to the plan period (i.e. to 2039/40). This would, of course, require an additional year of housing requirement (i.e. at least 538 dpa) being added to the plan.

Extraordinary Meeting of West Berkshire Council

It has been brought to Croudace's attention that on 1 February 2023, the necessary number of elected Council Members (which we understand was led by the Liberal Democrats) signed a requisition to seek an Extraordinary Meeting of West Berkshire Council to discuss the Regulation 19 LPR consultation on the basis that it is flawed.

According to the published agenda papers, Members proposed to debate 'abandoning' consultation on the LPR so that all relevant issues can be rectified and/or clarified and thereby avoid the perceived risk of the LPR submission being dismissed as unsound by the Planning Inspector, and to undertake a new Regulation 19 consultation in the future once these omissions and errors have been rectified.

In summary, the alleged flaws include:

- 1 Inaccuracies surrounding the housing numbers for North East Thatcham and the associated settlement boundary accommodating a greater level of growth than specified in the LPR;
- 2 The HELAA published in January 2023 contained new information which Councillors were unaware of when approving the Regulation 19 consultation;
- 3 Technical evidence not covering the entirety of the plan period;

	<p>4 The lack of engagement associated with, and evidence supporting, the provision of appropriate infrastructure to support the allocation at North East Thatcham;</p> <p>5 The SoS' WMS of December 2022 (regarding national planning policy reform) not being taken into account as part of the LPR.</p> <p>Croudace notes the points made and observed the Extraordinary Council Meeting on 2 March 2023 at which Members voted to reject the motion and as such it is envisaged that the LPR, together with a copy of all representations, will be submitted to the SoS for Examination as planned.</p> <p>Notwithstanding this, Croudace shares many of the concerns highlighted by the Liberal Democrats, which raise legitimate concerns over the soundness of the LPR as currently drafted. As such, it makes comments throughout these representations in a similar vein, albeit with the exception of the proposals contained in the WMS and subsequent NPPF prospectus consultation (which do not represent current Government policy, as explained in Section 1 of these representations).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	Extension of the plan period – upon adoption, it is likely that the LPR would look ahead only 14 years, whereas the NPPF requires plans to look ahead for a minimum of 15 years. Croudace requests that the Council extend the plan period by at least one year to at least 2039/40 in order to ensure that the LPR is 'positively prepared' and 'consistent with national policy'.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1680
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><u>Plan period is not consistent with national policy as it is likely to be less than 15 years on adoption.</u></p> <p>The proposed plan period runs to 2038/39 which will mean that the plan would need to be adopted in 2023/24 if it is to have a full 15 years from the point of adoption as required by paragraph 21 of the National Planning Policy Framework (NPPF). If the plan is adopted in 2024/25, as would seem most likely on the basis of submission in autumn 2023 and at least 12 months for examination, in then the plan would look forward for less than 15 years. Therefore, in order to ensure the plan period is consistent with national policy then an extra year should be added with the plan period ending in 2039/40.</p> <p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:</p> <ul style="list-style-type: none"> • Insufficient evidence to show the duty to co-operate has been adequately discharged. • Plan period that is not consistent with national policy • A failure to meet the unmet needs of Reading;

	<ul style="list-style-type: none"> • Failure to set out clearly the housing • Unjustified requirements in relation optional technical standards for accessible homes and nationally described space standards; • Unsound requirement to go beyond energy efficiency standards set out in building
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	<ol style="list-style-type: none"> 1 The Council have produced a signed statement of common ground setting out what the key strategic issues are with regard to the West Berkshire Local Plan and the co-operation that has taken place. This notes that housing needs and supply are a cross boundary issue and notes that unmet needs of Reading as a particular issue that needs to be resolved. As is also noted later on in our representations no Council in the West Berkshire Housing Market Area (HMA) has committed to addressing this small shortfall arising in Reading. Given that it is not a significant number of homes this should have been a relatively simple exercise and does not give much confidence as to the effectiveness the co-operation in this. Instead of addressing this issue the Councils have, contrary to the expectations of PPG, pushed back consideration of this issue to a future plan review. 2 What is also lacking within the statement of common ground or the Duty to Co-operate Statement is any recent evidence of ongoing cooperation and engagement. The Governance section of the SoCG for example points to a West of Berkshire Strategic Planning Group but we could find no evidence as to when these meetings have occurred, whether the key strategic and cross boundary issues were discussed and the outcome from these discussions. The Council will need to provide more detail if it is to show that it has co-operated effectively and met its legal duties.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1404
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background

Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The West Berkshire Strategic Transport Model in the Evidence Base has not been updated for the following: <ul style="list-style-type: none"> • End date for LPR revised from 2037 to 2039 • Additional housing sites proposed for Theale, totalling 100 units • Removal of housing sites proposed at Reg19 stage because of imposition of AWE DEPZs • Removal of proposed housing site at Pincents Hill, Tilehurst • Removal of proposed office employment site adjacent to M4 J12 • Policies in this LPR that allow office development in Designated Employment Areas, leading to increased private car journeys to/from the areas Transport Modelling

	<p>Modelled mitigations are limited to vicinity of NE Thatcham strategic site and do not take into account the housing allocations proposed around Newbury and Theale</p> <p>Air Quality</p> <p>The Air Quality Assessment in the Evidence Base has not been updated for the following:</p> <ul style="list-style-type: none"> • End date for LPR revised from 2037 to 203 • Additional housing sites proposed for Theale, totalling 100 units • Removal of housing sites proposed at Reg18 stage because of imposition of AWE DEPZs • Removal of proposed housing site at Pincents Hill, Tilehurst • Removal of proposed office employment site adjacent to M4 J12 • Policies in this LPR allowing office development in Designated Employment Areas <p>Air Quality Assessment App J</p> <ol style="list-style-type: none"> 1. Locations of many “vulnerable receptors” are given vague locations, e.g. “dentist, High Street, Reading”, making them impossible to identify. N.B. Reading is outside the district and “High Street, Reading” is remote from the district boundary 2. Many “vulnerable receptors”, , such as “Theale C Of E Primary School, Englefield Road, Reading” are in the table multiple times with different values with no explanation 3. Many “vulnerable receptors in the east of the district appear to be missing, including: <ul style="list-style-type: none"> • Little Heath secondary school • Denefield secondary school • Dentist In High Street • Theale Green secondary school in Church Street • Sheltered Housing in Elizabeth Court, James Butcher Drive (adjacent to Hoad Way/A4 roundabout) • Cumber Place apartments for over-55s, off the High Street • Trafalgar Court apartments for over-55s, Play Platt, off Englefield Road • Tigers Day Nursery, Church Street • Orthodontic Centre, Church Street • Wellbeing Centre, High Street • The Mile House Therapeutic School, Bath Road, Sulhamstead • Calcot Infant and Junior Schools • Calcot Surgery, Royal Avenue • Greenfield House Resource Centre (Day Centre), High View • Badgers’ Hill Pupil Referral Unit, Highview • Sheltered housing at York House Clarence Way
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The West Berkshire Strategic Transport Model in the Evidence base should be updated for the additions and omissions and re-run. The LPR should then be reviewed in the light of the results.</p> <p>Transport Modelling</p> <p>Mitigations for junctions further afield should be identified and modelled, particularly around Newbury and Theale.</p> <p>Air Quality</p> <p>The Air Quality Assessment in the Evidence base should be updated for the additions and omissions and re-run. The LPR should then be reviewed in the light of the results</p> <p>Air Quality Assessment App J</p> <p>The Air Quality Assessment should be corrected to include all vulnerable receptors in the district and be given accurate locations.</p> <p>The reasons for the multiple entries should be investigated and the entries corrected.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1611
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>EXECUTIVE SUMMARY</p> <p>Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. Boyer have prepared these representations on behalf of Sovereign, in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039).</p> <p>The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness. To this end, general support is provided to the spatial strategy set out in the West Berkshire Local Plan Review (2022 – 2039), to the Council's conduct of the plan-making process in relation to the Duty-to-Cooperate, and specifically for the allocation of Land Adjoining The Haven, Kintbury, for residential development.</p> <p>The Proposed Submission West Berkshire Local Plan (2022 – 2039) ('emerging local plan') proposes to allocate a series of sites to, as a minimum, meet the identified housing needs within the district. Despite the constrained nature of the district, the plan identifies a robust selection of sites that are capable of delivering residential development appropriate to accommodate sustainable growth to meet the minimum local housing need of the area. Sovereign supports this approach, recognising that the Council's commitment to accommodate the identified minimum Local Housing Need ('LHN') figure within the district is paramount.</p> <p>The Council's identification of sufficient developable land to deliver approximately 5% additional homes above the minimum identified need is also supported. Sovereign considers that this 5% 'headroom' provides for a flexible and robust quantum of housing supply to fully ensure that the identified housing needs of the district are met.</p> <p>Furthermore, the identified headroom in the housing supply could usefully accommodate a proportion of the unmet need that is likely to arise from Reading, as part of the Western Berkshire Housing Market Area ('HMA'). Sovereign supports the Council in seeking to accommodate a reasonable proportion of this unmet need and recommends that the Council seek to maximise the delivery of new homes on the proposed site allocations to assist in delivering this aim. Such an approach would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing, ensuring minimum housing needs are met.</p> <p>In seeking to deliver the amount of new homes required in the district, the Council have identified an appropriate spatial strategy. The emerging local plan recognises that there is limited further growth potential at the district's most sustainable settlements; namely, Newbury and Thatcham, alongside the Eastern Urban Area, whilst maximising the available land within the relevant site allocations. Sovereign supports the Council's identification of a spatial strategy which directs development to available land within the next most sustainable locations as appropriate, in accordance with the settlement hierarchy.</p> <p>The otherwise relatively unconstrained nature of the North Wessex Downs Area of Outstanding Natural Beauty ('AONB'), in combination with the presence of a series of sustainable medium and smaller-sized Service Villages, provides that the North Wessex Downs AONB Spatial Area (as identified in proposed Policy SP1) remains appropriate to accommodate a reasonable proportion of the district's identified housing needs.</p> <p>To maintain the longer-term vitality of the district's Service Villages, such as Kintbury, it is imperative that the Council supports the sustainable growth of these areas, supporting the viability of local services and amenities, alongside delivering much-needed affordable housing in rural areas. To this end, Sovereign supports the identification of specific site allocations within these villages, which provide opportunities for modest sustainable growth whilst conserving and enhancing the special landscape qualities of the AONB.</p> <p>Sovereign therefore supports the identification of Land Adjoining The Haven, Kintbury ('the site') as being suitable for allocation within the emerging local plan, through proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'. Kintbury comprises a relatively unconstrained settlement that can accommodate sustainable growth during the plan period. The site is well-positioned to make a reasonable contribution to meeting the district's development needs.</p> <p>The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities provided in the village, benefitting from good access to nearby main settlements including Newbury (by bus and rail), Reading, and London Paddington (by rail). There are not considered to be any significant constraints to the development of the site, which could provide at the very least a minimum of 20 high-quality new homes.</p> <p>Sovereign is able to confirm that the site is available for development now, offers a suitable location for residential development, and is achievable with a realistic prospect that housing can be delivered on-site within the first five</p>

years of the proposed plan period. Consequently, the site should be considered favourably in relation to planning practice guidance and its proposed allocation within the emerging West Berkshire Local Plan is supported.

Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant and is capable of being found Sound following independent Examination. Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.

Introduction

Context

Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. The Site Location Plan is provided at Appendix 1: Site Location Plan.

Sovereign holds a specific land interest within West Berkshire, known as Land adjoining The Haven, Kintbury ('the site'). These representations are aligned with this land interest and address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base, accordingly.

The site has been assessed by West Berkshire District Council ('the Council') within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. Furthermore, the site is proposed for allocation within the Local Plan Review document, to accommodate residential development, under proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.

The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness, as set out at paragraph 35 of the NPPF; namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:

- a) Positively prepared – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs.
- b) Justified – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.
- c) Effective – deliverable over the plan period and based on effective joint working.
- d) Consistent with national policy – enabling the delivery of sustainable development.

At this stage of the plan-making process, it is essential that West Berkshire District Council ('the Council') continues to pursue an approach that is consistent with national policy, effective, justified, and positively prepared. These representations comprise our recommendations to assist the Council in achieving such an approach, as emerging plan progresses toward adoption.

These representations build upon and should be considered in conjunction with the previous representations submitted by Sovereign to the 'Regulation 18' consultation on the West Berkshire Local Plan Review 2020 – 2037: Emerging Draft (December 2020), which ran from 11 December 2020 to 5 February 2021.

Policy Context

The Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council then adopted the Housing Site Allocations Development Plan Document in May 2017, to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the district therefore sets out the spatial strategy to meet development needs up to 2026 and provides a series of site allocations and planning policies that seek to deliver that strategy.

To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The draft plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption, which is anticipated in 2024.

Sovereign **supports** the Council's commitment to review the existing development plan through this process.

Conclusion

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district, whilst recognising the vital role that modest growth provides to support medium and smaller-sized villages within the North Wessex Downs Area of Outstanding Natural Beauty.

Sovereign supports the Council's commitment to meeting housing needs in full and supports the Council's identification of a reasonable amount of headroom in the district's housing supply to ensure that local housing needs are met during the plan period.

However, Sovereign recommends that the Council seeks opportunities to maximise the development capacity of appropriate sites to ensure that the identified headroom is as robust as is reasonably practicable. Land adjoining The Haven, Kintbury, which is proposed to be allocated for the development of approximately 20 new homes under emerging Policy RSA23, presents such an opportunity. Sovereign considers that the approximate capacity allocated for the site could be higher, without detriment to the amenity of adjoining residents, with sufficient scrutiny to the design of the scheme and in considering greater benefits to the wider community. The provision of additional capacity could reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district.

	<p>Furthermore, Sovereign supports the proposed spatial strategy, which includes a modest amount of residential development within the North Wessex Downs AONB Spatial Area. The approach maintains the existing spatial strategy within the district and would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing. The proposed allocations have also been evidenced and justified through detailed analysis to ensure the high value of the AONB and any potential impacts are carefully considered.</p> <p>Otherwise relatively unconstrained, the nature of the district's North Wessex Downs AONB Spatial Area, which includes the presence of a series of sustainable, small and mediumsized villages, provides that the area remains appropriate to accommodate a reasonable proportion of the district's identified housing need. Furthermore, to support the longer-term viability of these villages, it is critical that the Council supports opportunities to provide modest growth in appropriate locations.</p> <p>To this end, Sovereign supports the proposed allocation of Land adjoining The Haven, Kintbury, for residential development under emerging Policies SP15 and RSA23. Kintbury comprises a relatively unconstrained settlement that could accommodate a reasonable level of growth during the proposed plan period. Land adjoining The Haven is well-positioned to make a reasonable contribution to meeting the district's development needs in this location.</p> <p>The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities within Kintbury. Furthermore, the site benefits from good access to nearby main settlement areas via bus and rail links, including Newbury and Reading. There are no significant constraints to the development of the site for approximately 35 new homes which could not be resolved through detailed, sensitive design consideration.</p> <p>Sovereign is able to confirm that the site is available for development now, represents a suitable location for development, and that development of the site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The site is deliverable and should continue to be favourably regarded in relation to allocation for residential development within the emerging West Berkshire Local Plan.</p> <p>We look forward to continuing to work with West Berkshire District Council, Kintbury Parish Council, and the wider community to provide much-needed new housing in this rural community. We also look forward to exploring how the Land adjoining The Haven, Kintbury can contribute to the delivery of sustainable development and benefit the village, local infrastructure, and facilities.</p> <p>We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.</p> <p><i>See attached document for a full response <Boyer obo Sovereign_full rep></i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
<p>4. Proposed Changes</p>	<p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1698
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1698 Thatcham Town Council_DtC Report_Document properties.docx
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>We were surprised to find that the Duty Cooperate Statement for the Regulation 19 consultation has the filename 'LPR_Interim_DtC_Statement_(January_2023).pdf'. Several places in the document suggest the intention to modify before submission for examination, for example:</p> <p>5.29 While the LPR is out for Reg 19 consultation, we will work together towards a statement of common ground between West Berks and National Highways, ready in time for the Examination stage of the LPR. We will continue our collaboration with National Highways as the Local Plan gets finalised. The ideal situation is that at examination we have an agreed statement of common ground confirming there are no issues flowing from our proposals from National Highways' point of view; and, they are content with our approach and methodology of assessment / modelling.</p> <p>5.38 Water and drainage are considered across the district at a strategic level and the close work with Thames Water is highlighted who supply both the water and collect and treat waste water across the district. This work will continue as the Local Plan is progressed and proposals for development are firmed up with more certainty.</p> <p>5.44 The approach to Habitats Regulations Assessment (HRA) has been developed in conjunction with Natural England and they agreed with our initial screening opinion and the final HRA document has been developed following that screening. We have requested entering to a statement of common ground with Natural England and will continue to work with them on this topic.</p> <p>This Interim Duty to Cooperate Statement is presumably a 'proposed submission document' under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. It therefore cannot be modified after the Regulation 19 Consultation, because all proposed submission document must have been available for inspection during the consultation period.</p>

	<p>Therefore, if the Duty to Cooperate Statement is modified after the consultation period, as appears from its filename and content to be the intention, the amended document would not be legally compliant with Regulation 19.</p> <p>As the document does not include any 'version control' information, the pdf document properties of the version for Regulation 19 consultation are copied below, so that the correct version can be confirmed at Examination: <See attached document - <i>Thatcham Town Council_DtC Report_Document properties</i>></p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Paragraph 27 of NPPF states:</p> <p>"In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency."</p> <p>We are not aware of the Duty to Cooperate Statement (and therefore the Statement of Common Ground that it contains) having been made available prior to 6th January 2023 (the previously intended start date of the Regulation 19 Consultation). Paragraph 5.29 suggests that a Duty to Cooperate Statement will be provided at examination that has not been available during the Regulation 19 consultation.</p> <p>Neither of these provide any transparency to the public during the plan-making process.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	The Examination must consider the version of the Duty to Cooperate Statement that was available during the Regulation 19 Consultation

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thattham Town Council is the principal representative body of the community of Thattham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as described in these representations. The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Morgan, Paul
Consultee Full Name	Paul Morgan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1231
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:57:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The Document is difficult to read, it lacks details, lacks cohesion and is not evidence based. For such an important plan the public should have been provided with the opportunity to see a presentation / exhibition and been allowed to ask questions / seek clarification from the authors. It feels like everything is being done behind closed doors and the public will be presented with a fait accompli.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes

5. Independent Examination	<i>The Local plan as it currently stands is, in my opinion, a poorly presented document and does not provide up to date evidence or sufficient detail to provide a sound basis for a local plan that will be in place until 2039. It appears rushed and ill considered in many areas. The public really should have had the opportunity to question and clarify directly with the authors at a "Town Hall" type presentation / exhibition / seminar.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucklebury Parish Council (Represented by Andrew Black Consulting)
Consultee Full Name	Bucklebury Parish Council
Consultee Organisation	Bucklebury Parish Council
Agent Full Name	Andrew Black
Agent Organisation	Andrew Black Consulting
Comment ID	PS1226
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:11:00
Attached Files	Andrew Black Consulting (Bucklebury PC) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<i>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep' for full consultation response]</i> Timing of Consultation It is also surprising that members did not require the plan to be taken back to full council for approval prior to submission to the Planning Inspectorate for examination. Most authorities have held a final vote in order to approve the submission of the local plan for examination. An example of this being Spelthorne Council on 31 January this year where the decision to submit for examination was made by members in full knowledge of the responses received during the final regulation 19 consultation. It is considered highly irregular that WBC has not chosen to provide members with the same opportunity. Given the significant failings in the plan identified by BPC and numerous others, it is considered that members should still be given the opportunity to consider the position of submitting a plan for examination that is effectively destined to be found unsound. Section 20 of the Planning and Compulsory Purchase Act 2004 sets out the process for independent examination and states that a local planning authority must not submit a development plan document to the Secretary of State for independent examination unless (with emphasis added) a) <i>They have complied with any relevant requirements contained in regulations under this part, and</i> b) <i>They think the document is ready for independent</i>

	<p>Notwithstanding the failings under regulations including those for Sustainable Environmental Assessment it is clear from even a cursory reading of the development plan documents that the LPR is <u>not</u> ready for examination. The regulation 19 consultation was twice delayed, presumably due to inadequacies in the evidence base. It is not considered that the plan is ready for examination, and it is the position of BPC that it should not be submitted until councillors are satisfied that it passes the statutory requirements of section 20 of the Act.</p> <p>This in itself is a matter for legal challenge which BPC maybe taking further advice from Counsel on should the plan continue to examination in its current form and on the current timescales.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep] for full consultation response]</i></p> <p>Introduction and Executive Summary</p> <p>The representations set out that there are multiple significant flaws in the regulation 19 version of Local Plan Review which are incapable of being remedied prior to the submission of the document for examination. The Local Plan Review, and accompanying evidence base, is fundamentally unsound for numerous reasons as set out within these detailed representations.</p> <p>These representations have been prepared with significant input from experts on a variety of technical matters. Technical reports have been prepared by Yes Engineering in relation to highways and the Nature Bureau in relation to biodiversity and ecology and are appended to these representations.</p> <p>The representations have been informed by ongoing consultation with the residents of Bucklebury and the surrounding area who have detailed knowledge of the history and constraints of North East Thatcham. This has uncovered a substantial lack of logic in the decision-making process to allocate the area to the North East of Thatcham for significant housing growth.</p> <p>At the time of these submissions, a consultation is taking place (until 2 March 2023) for proposed changes to the National Planning Policy Framework (NPPF). The potential impact of those changes in respect of the WBC Local Plan Review are discussed in subsequent sections of these representations. However, the main thrust of these representations is made against the existing tests of soundness as set out in paragraph 35 of the current NPPF. This states that plans are 'sound' if they are:</p>

	<p>Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>Effective—deliverable over the plan period, and based on effective joint working on cross- boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</p> <p>For the reasons set out within these representations, it is considered that the plan is unsound and fails against each of the tests as set out in paragraph 35 of the framework in numerous areas of the LPR. The failings against the tests of soundness are set out in each of the subsequent sections of these representations.</p> <p>Site Selection Process</p> <p>Of further concern in the site selection process is the transparency of the Housing and Economic Land Availability Assessment (HELAA). The most recent version of the was only published at the time of the start of the consultation process and was not made available to councillors when the decision to launch the regulation 19 consultation. It is also notable that the previous versions of the HELAA from February 2020 and December 2020 have not been made available as part of the evidence base for the plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep] for full consultation response]</p> <p>Consultation and Duty to Cooperate</p> <p>Local planning authorities must comply with the Duty to Co-operate when revising their development plan documents and reviewing whether they remain up to date.</p> <p>Section 33A(3)of the Planning and Compulsory Purchase Act 2004 sets out the activities which bodies subject to the duty to co-operate must co-operate on. Paragraph (3)(d) of section 33A of that Act provides that such bodies will be subject to the duty when undertaking activities that can reasonably be considered to prepare the way for the preparation of development plan documents, marine plans and other local development documents. Plan reviews prepare the way for the preparation of such documents as they involve an assessment of whether policies in a plan need updating</p> <p>Plans are required to set out strategic policies that address strategic priorities. These may include cross-boundary matters, including issues such as whether an authority is able to meet all its housing need. Given the direct implications of plan reviews in enabling such matters to be addressed through the updating of policies, it is important that the bodies subject to the Duty to Co-operate have an opportunity to engage in both how plan reviews are undertaken and the review of the plan. Engagement with neighbouring authorities and prescribed bodies needs to occur before a final decision on whether to update policies in a plan is made, as such engagement may influence that decision.</p> <p>The level of co-operation is expected to be proportionate to the task and should not unduly delay the plan review. For example, an authority may set out how they propose to review the policies in their plan and when and how neighbouring authorities and prescribed bodies will be engaged. A record of how authorities will be engaged in the review of plans and of where agreement has or hasn't been reached on the need to update a policy or policies can be set out in the Statement of Common Ground.</p> <p>WBC announced the reg 19 consultation on 20th January but then notified interested parties that some content on the WBC web site would be unavailable on 21st and 22nd January because of planned work on maintenance of the site. It was unclear what content could not be accessed and so review of the LPR evidence could not begin. WBC knew of the maintenance work and could have started the consultation once the evidence was available on 23rd January. The effect of their mismanagement is to shorten the Reg 19 consultation by 2 days to less than the 6 weeks required.</p> <p>Further evidence of the lack of consultation is apparent in the approach taken by WBC to the Settlement Boundary Review. A consultation was launched by WBC in February – March 2020 and details of this are set out in the Settlement Boundary Review Paper. The timing of the consultation is curious given that this was undertaken at the time of the first lockdown for Covid-19 when Parish Councils and residents were focused on the response to Pandemic.</p> <p>BPC was not consulted by WBC on the boundary review in the first instance as part of the Settlement Boundary Review. When told of the review by Thatcham Town Council, BPC responded (appendix 1). WBC erroneously state in the review paper that BPC failed to respond. The important points made were the need for a strategic gap between Thatcham and Bucklebury and that a ‘country park’ should be outside the settlement boundary to aid its protection. Each of these factors were ignored in the LPR.</p> <p>BPC has wider concerns around the way in which WBC has undertaken the consultation process for the LPR and the Duty to Cooperate in general. Failings with Duty to Cooperate are matters which are not capable of being remedied in advance of the plan being submitted for examination. BPC will set out further details of these failings to the inspector should the plan be submitted to the Planning Inspectorate by WBC.</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence through the submission of matters statements and oral evidence from experts. To provide updated evidence to the examiner. For other relevant experts employed by parish council to give detailed technical views on matters.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS733
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	Speen Parish Council are extremely impressed with the level of detail provided and it is clear that a significant amount of work has gone into this draft. We would like to thank all the officers who were involved and the Planning Advisory Group for the time that they spent on this comprehensive strategic Plan.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	Yes

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1319
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Multiple version of draft Local Plan</p> <p>During the preparation of representations, I have discovered that West Berkshire Council have published several versions of the draft Local Plan during January 2023. These have the same title 'West Berkshire Local Plan Review 2022-2039 Proposed Submission January 2023' and cover page, which can only be distinguished by the page header. The most recent that I am aware has the header "West Berkshire Council: consultation version 20th January 2023". Potential respondents were not informed of this, either on the web page where the document could be downloaded or by email.</p> <p>I am aware of material differences between the versions in the first paragraph of policy SP17 and in relation to its number of dwellings – but there may be others.</p> <p>Therefore, if the Examination finds representations that do not accord with the wording of the draft Local Plan that it receives, this might be because a respondent has inadvertently used an earlier version of the document (but which was still represented at the time of its publication as being final).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	For the information of the Examination only.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	If it would assist the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Wastie, Kate and Harrison
<p>Consultee Full Name</p>	Kate and Harrison Wastie
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS915

Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	I should like to register my objection to West Berkshire Council's LPR of 2023 for several reasons. The most basic reason is that updated guidance on these matters is due to be published later this year by the government and if this plan is proceeded upon it may become outdated and open to legal challenges if implemented leading to delays and missed targets. It is anticipated that the government's required numbers of houses in each area will be reduced, which is most significant. The plan also contradicts the national guidelines on impact on AONBs.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I should like to register my objection to West Berkshire Council's LPR of 2023 for several reasons. The most basic reason is that updated guidance on these matters is due to be published later this year by the government and if this plan is proceeded upon it may become outdated and open to legal challenges if implemented leading to delays

	<p>and missed targets. It is anticipated that the government's required numbers of houses in each area will be reduced, which is most significant. The plan also contradicts the national guidelines on impact on AONBs.</p> <p>There is insufficient information about who provided the information used in preparing this report, who paid the costs and who put it together. The plan has no explanation as to how it will be enacted in the time span covered by the report.</p> <p>The LPR lacks detailed and transparent supporting evidence to the assumptions used. This is particularly vital regarding the numbers and types of housing needed in the future. With the lack of substantive detail it must be assumed that the any new estates will be the usual, high profit mix of executive and middle management houses. Given the current and foreseeable situation the biggest requirement must be affordable and social housing, true vision would provide a lot more of these types. The plans talk of a percentage of affordable housing but experience shows that the number of these reduce as developers find unforeseen profitability problems, the WBC roll over and a reduction in number is agreed. We should be catering for a high percentage of the types of housing all of the community need not just those with the income to buy. As a young couple looking to start a family, but currently stuck in the rental market due to the high house prices in the area, this point is particularly pertinent to our situation. If this housing landscape does not change soon we would potentially look to move away from the area.</p> <p>In the LPR there is no effective detail on mitigating the effects of the extra housing on the social, physical and environmental infrastructure. With the existing pressures on all of these no LPR can ignore this matter. The effects on traffic, schools, doctors, care homes, drainage, water supplies, education, countryside etc will be very significant. The plan does not address the need and cost for extra schools, GP surgeries, care provision, road improvements, new paths in local villages as commuting traffic increases. The roads around Newbury are already very busy and these plans will put extra traffic on all of the C roads as new rat runs to the motorway junctions become used. We have lived in Thatcham for (personal information redacted) years and have recently moved to the outskirts of Newbury, and traffic is already an issue, not to mention the poor states of the roads due to this. School places are hard come by, with very little choice for parents, and public transport to and from schools is already at full capacity. These are only the tip of the iceberg of issues – imagine the impact if so many new houses are added to an already stretched community.</p> <p>Any LPR should be looking at alternatives to simple large estates and there is no detailed confirmation this has been done. The capacity of smaller developments, brownfield sites, unbuilt planning permissions, and utility of other areas should all be quantified.</p> <p>All development plans should take into account their effect on the immediate and local communities. To provide large estates means smaller communities become one big urban sprawl to the detriment of living standards generally. For instance to enlarge Thatcham by 1500 to a potential 2500 would mean Thatcham, Newbury and local villages like Cold Ash and Upper Bucklebury run one into another. Having resisted closing the green gap between Thatcham and Newbury for this reason it is ridiculous to propose this many houses around North Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hathor Property Limited (Represented by Bell Cornwell LLP)

Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Brigid Taylor
Agent Organisation	Bell Cornwell LLP
Comment ID	PS1256
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Site Allocations have been selected and the plan finalised for consultation prior to finalisation of HELAA site assessments; decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development.</p> <p>Public comments invited until 3 March, in the knowledge of proposed meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process.</p> <p>Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comment on full assessment of the impact of the proposed development strategy.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><i>Timing of production of evidence base:</i></p> <p>We note that Proposed Submission Regulation 19 Local Plan review was presented to Full Council on 1 December, and the decision taken at that meeting to move towards public consultation. Yet the HELAA report containing assessment of proposed allocations and other available sites was not published until January 2023. The latest update prior to that was December 2020, so a number of changes and additions are expected in the interim. As such, the decision appears to have been taken by members to finalise the selected allocations for inclusion in the LPR, prior to them having had sight of the full range of HELAA site assessments. This raises doubts as to the soundness of the proposed allocations, given members could not have had a full appreciation of the range of options available for allocation, and the relative merits/ constraints associated with each.</p> <p>Other key parts of the evidence base have also been finalised and published after key final decisions were taken on the strategy and proposed allocations, including:</p> <ul style="list-style-type: none"> • Air Quality Assessment – published Jan 2023 • Employment Background Paper – published January 2023 • Flood Sequential Test Report – published January 2023 • Housing Background Paper – published January 2023 <p><i>Errors in evidence base:</i></p> <p>It is also unfortunate to note that there are errors within the evidence base documents, which could contribute to a finding that the LPR is unsound. We shall not detail these in full, but by way of example:</p> <ul style="list-style-type: none"> • Site Selection Methodology, published January 2023, refers in paragraph 1.1 to the plan covering the period up to 2037 – which of course should be 2039; • The Air Quality Assessment, published January 2023, is based on a plan period up to 2037, so has not assessed pollutant concentrations for the full plan period. The post script on page 10 notes that fact that the plan period has extended out to 2039 following production of the draft assessment, and that once the revised transport model forecasts for 2039 become available, further analysis will be required to confirm there are not significant differences from the assessment which is based on a plan period up to 2037. That work should be carried out prior to the Regulation 19 consultation and submission to Independent Examination. • Transport Assessment – phase 1 was completed in December 2020 and assesses a plan period up to 2037. Phase 2 modelling (July 2021) and assessment was also based on a 2037 end date. As such it is not clear that the full plan period has been assessed and that the effects of the large strategic development locations, up to 2039, are known. This is a key issue with the proposed development strategy, given the focus on larger strategic sites in edge of settlement locations. That assessment work should be carried out prior to the Regulation 19 consultation and submission to Independent Examination, so that the public can comment meaningfully on it.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Update evidence base to assess full plan period, and revisit proposed site allocations following completion of that work. To include update to technical studies and whole plan viability. Undertake a further public consultation on the proposed plan/ allocations once the full suite of technical work is complete and up to date.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1161
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We note that our client is broadly supportive of the Plan, including its Vision and Objectives, which clearly recognises the role that small and medium-sized enterprises play in ensuring a resilient and sustainable economy. Further, our client welcomes the Council's aspirations to continue to conserve and enhance the North Wessex Downs AONB, with appropriate landscape-led development delivering wider environmental, economic and social benefits.</p> <p>Notwithstanding the above, our client has concerns as to whether the Plan provides a 'sound' strategy to deliver sustainable development. On this basis, we have prepared the enclosed representation form, covering emerging policies related to Spatial Strategy, North Wessex Downs AONB, transport, heritage and sustainability.</p> <p>It is noted that the Council held an Extraordinary Meeting on 2nd March to decide whether they proceed or withdraw the current consultation. The related agenda item itself describes the current Local Plan consultation as containing serious 'omissions and ambiguities' which make the plan unsound. The flaws appear to principally relate to the northeast Thatcham allocation and how processes were followed including communication of key information to Council Members. The housing number relevant to this allocation is also in doubt. The ultimate vote resulted in the motion being lost and the Plan consultation to continuing. These important matters of soundness and related procedural matters will need to be addressed prior to the submission of the plan for examination.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Osmond, Val
Consultee Full Name	Val Osmond
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1342
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Specific Objections : WBC's process and timings</p> <p>Government consultation on the NPPF</p> <p>The NPPF consultation launched in December 2022 runs until 2nd March, 2023. The Consultation Version of the NPPF sets out that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan) will be advisory not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking into account the character of an area when assessing how much housing can be accommodated.</p> <p>Therefore it is unacceptable that West Berkshire are continuing to consult on the current version of the local plan, that councillors did not require the final version of the plan to be brought back to them for before it is submitted to the Planning Inspectorate for examination.</p> <p>On the back of this announcement, several Local Authorities have paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned</p> <p>We feel that the council should take the opportunity, as others have, to pause the plan making and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Darcliffe Homes Limited (Represented by Boyer Planning)
<p>Consultee Full Name</p>	Darcliffe Homes Limited
<p>Consultee Organisation</p>	Darcliffe Homes Limited
<p>Agent Full Name</p>	Mr Joe Hickling
<p>Agent Organisation</p>	Boyer Planning Ltd

Comment ID	PS1804
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	THE PLAN PERIOD Paragraph 22 of the NPPF requires that ' <i>...strategic policies should look ahead over a minimum 15 year period from adoption</i> '. The Council's proposed plan period runs to 2038/39, which would mean that the plan would need to be adopted in 2023/24 if it is to ensure a full 15 years from the point at which it is adopted. The Council's own

	<p>Local Development Scheme ('LDS') [Footnote 12: Available online at: https://www.westberks.gov.uk/media/53425/Local-Development-Scheme- January 2023/pdf/Local_Development_Scheme_Jan_2023_clean.pdf?m=638097176540170000], further demonstrate the extent of this need in the plan area, finding there is a need within West Berkshire for approximately 330 new affordable homes per annum up to 2039.</p> <p>To redress this, Darcliffe recommends the plan-period should be extended by at least 12 months, ending in 2040. This would, in effect, increase the overall housing target by at least 513 dwellings, to cover the additional monitoring year. The council will also need to identify additional supply of new homes to address the plan's extended plan period.</p> <p>Darcliffe recommends that the allocation of the Land west of Little Heath Road, Reading for approximately 322 dwellings could and would make a significant contribution to redressing this additional housing need through the plan period.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincents Lane (Represented by TOWN)
Consultee Full Name	Pincents Lane
Consultee Organisation	Pincents Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1860
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincents Lane) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Duty to Co-operate</p> <p>The Duty to Co-operate is a legal requirement under section 33A of the Planning and Compulsory Purchase Act 2004 for which guidance is set out in NPPF 2021 paragraphs 24-27.</p> <p>The four LPAs which make up the Western Berkshire Housing Market Area, including WBC and Reading Borough Council, signed an updated Statement of Common Ground for Local Plan Making in August 2021.</p> <p>That SoCG (paragraph 4.5) recognises a shortfall of 230 dwellings in total for Reading BC's area, or 10 per annum over the plan period (to 2036). This shortfall derives from Policy H.1 of the adopted Reading Local Plan, November 2019, which states:</p> <p><i>H1: PROVISION OF HOUSING</i></p> <p><i>Provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036.</i></p> <p><i>The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 230 dwellings that cannot be provided within Reading will be met over the plan period.</i></p> <p>Paragraph 4.4.6 develops the issue of the shortfall:</p> <p><i>Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 230</i></p>

	<p> dwellings when considered against Reading’s need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market Area. The other three authorities within the HMA recognise that there will be issues with Reading’s ability to accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up⁷⁵. There will be continuing dialogue on this matter between the affected authorities which will inform local plans. Where agreement is reached, it will be for individual authorities’ Local Plans to specify where development will be located.</p> <p>Where: 75 http://www.bracknell-forest.gov.uk/west-of-berkshire-spaal-planning-framework-final.pdf</p> <p>In principle, therefore, the shortfall of 230 dwellings must be met within the West of Berkshire Area. Policy H1 envisages that individual Local Plans will specify where development will be located yet there is no such specification or allocation in the WB R19 LPR. Indeed paragraph 1.28 of the R19 LPR is silent on Reading’s unmet need. The SOCG contains out an important caveat: “... it is important to note that this agreement relates only to Reading’s need as calculated by the (West of Berkshire SHMA) not by any alternative calculations of need, which will need to be subject to separate discussions.”¹ (quote from para 4.5 of the SoCG, reproduced at Appendix 4 of the WBV Duty to Cooperate Statement January 2023)</p> <p>Although the 230 dwelling shortfall is a product of the SHMA, it has been examined and is now embedded in policy H1 of Reading’s adopted local plan.</p> <p>Reading BC’s area need is due to be calculated by the end of December 2024 using the standard method (or any other calculation which applies at that time), yet there is no evidence of any separate discussions with regard to this.</p> <p>There is no agreement between the four LPAs on how this current shortfall might be met across the HMA. Furthermore, RBC will face an uplift in its figures of 35% as a result of it being one of the 20 most populous urban LPAs in England. Whilst there may be no requirement for adjoining LPAs to accept this element of unmet need it will still serve to increase the pressure on the HMA as a whole.</p> <p>Moreover, as recognised further in the WBC Duty to Co-operate Statement: <i>2.7 The settlements in the Eastern Area – Purley on Thames, Tilehurst, Calcot and Theale have a close functional relationship with Reading. Whilst many residents in this area use facilities and services in Reading, there is a significant movement the other way in terms of school children, with West Berkshire schools educating a significant number of Reading pupils.</i></p> <p>Without a clear and document agreement on how Reading BC’s unmet need can be met across the HMA, and more specifically West Berkshire which shares its border with the Reading urban area, it is obvious that WBC has failed to meet the Duty to Co-operate tests. This means the R19 LPR is also not sound because it has not been positively prepared and is not consistent with NPPF 24-27.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>As above</p>
<p>4. Proposed Changes</p>	<p>Address the shortfall of unmet need arising in Reading by allocating more sites in the Eastern Area. Thee are sites which are recognised as achievable and deliverable in the Council’s evidence base supporting the LPR. Prime amongst these is site TIL13 at Pincents Lane.</p> <p>Site TIL13 has a long planning history. By common consent, the problems with the 2011 appeal scheme have been resolved and no technical obstacles exist to development of the site for a scheme of up to 165 dwellings. By the LPA’s own assessment, the concerns – and the reasons for not proposing it for allocation – are entirely “political”. No one would deny the validity of elected members making political choices where real choices exist, but the fact is that not allocating the site would leave the LPA without a single significant contribution to offer to meet either its own housing need in the Eastern Area or that arising from Reading, of which the Area is functionally part. The site should therefore be allocated.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1865
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Thatcham Town Council respectfully submits its representations on West Berkshire Council's Regulation 19 Consultation on its draft Local Plan.</p> <p>The Town Council welcomes the decision of West Berkshire Council to reconsider its proposal in the Emerging Draft Local Plan for a strategic site of 2,500 homes to the north east of Thatcham. However, the Regulation 19 draft Local Plan does not properly consider the impacts of a development of its revised proposal for 1,500 homes, nor adequate provision for the infrastructure that Thatcham so desperately needs – even before any additional homes are built.</p> <p>The current Local Plan states that:</p> <p>“Thatcham’s services and facilities will be improved allowing the town to fulfil its role within the District Settlement Hierarchy and the Hierarchy of Centres, serving the local population, not only within Thatcham, but also the surrounding rural areas.”</p> <p>This improvement has not happened during the current plan period, and the policies in the draft Local Plan and the Infrastructure Delivery Plan will not deliver this in the next plan period. The draft Local Plan is therefore unsound, as it relates to Thatcham and its surroundings.</p> <p>Thatcham Town Council acknowledges that Thatcham should make its proportionate contribution to the housing needs of West Berkshire, once the deficit of infrastructure (particularly social infrastructure) in the town has been addressed.</p> <p>These representations identify numerous reasons why the draft Local Plan as it relates to Thatcham is not legally compliant or is unsound. The Town Council believes that it is not ready for independent examination (as per Section 20 (7) of the Planning and Compulsory Purchase Act 2004). We therefore urge West Berkshire Council to delay the submission of the draft Local Plan to the Secretary of State, so that these matters can be addressed. This would also enable it to take into account the review of the National Planning Policy Framework, on which the Government is currently consulting.</p> <p>Should West Berkshire Council proceed with submission of the draft Local Plan in its current form, the Town Council envisages that the changes necessary to make it sound would be more extensive than could be addressed through ‘main modifications’, and it would therefore be rejected. The Town Council understands the need for West Berkshire to have a Local Plan. Delaying the submission in order to address the issues in these representations is therefore likely to lead to an earlier date of final adoption.</p> <p>The Town Council welcomes the statement in paragraph 6.63 of the draft Local Plan “Further detailed work will be required to develop a coherent masterplan or development framework to take the development <i>[at North East Thatcham]</i> forward, which will be produced in collaboration with the community and other stakeholders.”</p> <p>As the principal representative of the community of Thatcham, the Town Council looks forward to playing a leading role in this collaboration. If this collaboration had started earlier (between the Regulation 18 consultation on the Emerging Draft Local Plan and this consultation) as is called for in Paragraph 25 of NPPF, then many of these representations might not have been necessary.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>

5. Independent Examination	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Basingstoke & Deane Borough Council
Consultee Full Name	Anne Shattock
Consultee Organisation	Basingstoke & Deane Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1723
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 09:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It is recognised that WBC is progressing with the plan-making process and includes provision for meeting the borough's housing needs and addressing its response to the Climate Change Emergency. However, BDBC wishes to ensure that West Berkshire Council is meeting its needs in full and that the Plan takes account of any potential impacts upon the borough and its residents.</p> <p>The draft Plan sets out how the council has sought opportunities to meet the office and industrial needs for the district but acknowledges that there is an identified shortfall in supply. WBC commits to addressing this in the first five year review of the Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst NDP Group
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst NDP Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1727
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>1.34 States that once the Regulation 19 stage is complete, the Council will submit an updated Draft LPR to the Secretary of State. Our understanding is that the submitted document should not differ from that used for the consultation:</p> <p><i>"1.3. The plan that is published for consultation at Regulation 19 stage should be the plan that the LPA intends to submit to the Planning Inspectorate for examination. This is a key premise of delivering an efficient examination timetable."</i> – Procedure Guide for Local Plan Examinations (https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations#section-1-before-submission)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1598
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Paragraph 1.14 (Neighbourhood Planning) – Thakeham supports the proactive use of Neighbourhood Development Plans by local communities to influence development in their local areas, particularly where Neighbourhood Development Plans seek to allocate sites for development to assist meeting the housing need within the local authority area.</p> <p>Paragraph 1.19 (Housing and Economic Land Availability Assessment (HELAA)) – This paragraph refers to the February 2020 HELAA that forms part of the evidence base of the Reg 19 Local Plan. It is evident that this HELAA assessment has since been updated in December 2020, and most recently in January 2023. Thakeham welcomes the approach to keeping the HELAA updated, however, it is noted the evidence base for the HELAA remains unchanged. Sites are therefore, for example, being assessed against the 2011 Landscape Sensitivity Assessment; a document which is now over twelve years old. The Reg 19 Local Plan proposes new allocations to help meet the housing requirement over the Plan period to 2039, however Thakeham considers the inclusion of new sites within the Reg 19 Local Plan should be based on sound and the most up to date evidence. This is particularly imperative in relation to landscape, given its ability to change over time. The Housing Background Paper (January 2023) confirms at paragraph 3.14 that ‘the sites considered for allocation were identified through the HELAA’. Thakeham considers the evidence supporting the HELAA is out of date and therefore this is not a sound approach. New sites have been added to the HELAA and assessed, without the assessment of previously submitted sites having been revisited.</p> <p>As an example, our Site is discounted within Stage 2b of the HELAA assessment, following the Landscape Sensitivity Assessment (2011) conclusion that development would result in harm to the AONB. Thakeham submitted detailed evidence to West Berkshire Council in December 2021, in the form of an updated Landscape Appraisal (September 2021), that demonstrated positive changes to the Site’s context when compared to the Council’s 2011 Landscape Sensitivity Assessment and concluded the Site could be developed without causing harm to the AONB. In addition, we confirmed to West Berkshire Council that Lambourn Parish Council has produced a Landscape Character Appraisal (November 2020), to inform the LNDP, which also confirms the Site is capable of sensitive development. This evidence does not appear to have been considered.</p> <p>The Council confirms at paragraph 1.23 of the Reg 19 Local Plan that ‘one of the key features of the plan-led system is that development plans should be based on up-to-date evidence’. Thakeham supports this, however, maintains the position that the evidence supporting the HELAA is out of date. Thakeham has received no correspondence from the Council on the above, however would welcome the opportunity to discuss the matter further.</p> <p>Paragraph 1.22 (Duty to Cooperate) notes the intention of the Council to continue the cross- boundary relationship with neighbouring authorities. Thakeham supports this approach and considers that it goes to the heart of successful strategic planning. It is noted however that the ‘Duty to Cooperate Statement’ at paragraph 5.7, whilst confirming that Reading’s unmet need should be met within the West of Berkshire Area, also states that ‘this agreement relates only to Reading’s need as calculated by the Berkshire SHMA, not by any alternative calculations of need’. Thakeham suggests that this is re-written, as it appears to not include the Government’s proposed method for calculating housing need and therefore cannot be considered a sound approach. It is also not clear how this unmet need will be delivered.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council’s evidence underpinning certain policies is strong, in others it is notably weak.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst Parish Council
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1660
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>1.34 States that once the Regulation 19 stage is complete, the Council will submit an updated Draft LPR to the Secretary of State. Our understanding is that the submitted document should not differ from that used for the consultation:</p> <p><i>"1.3. The plan that is published for consultation at Regulation 19 stage should be the plan that the LPA intends to submit to the Planning Inspectorate for examination. This is a key premise of delivering an efficient examination timetable."</i> – Procedure Guide for Local Plan Examinations (https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations#section-1-before-submission)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Macro, Alan
<p>Consultee Full Name</p>	Councillor Alan Macro
<p>Consultee Organisation</p>	

Agent Full Name	
Agent Organisation	
Comment ID	PS1483
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<i>Policies Map</i> <i>The policies map does not clearly show the following for Theale:</i> • <i>primary shopping area</i> • <i>three conservation areas</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	The map should be corrected to clearly show the primary shopping area and the conservation areas in Theale
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1287
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Local Plan Regulation 19 covering letter to Inspector As Leader of the main Opposition Group on West Berkshire Council and with the support of my entire Group, I am writing to point out the unusual situation in this Council, and as such the Local Planning Authority in whose name you are being sent our draft Local Plan for Examination in Public. The Council is due to hold all-out elections on 4th May and therefore enters the statutory "Pre-Election Period" during which - from the formal Calling Notice on Friday 24th March until the first meeting of the Full Council after the election currently scheduled for Friday 25th May – no political decision can be made. In the outgoing Council at this time, there are 24 Conservatives, 16 Liberal Democrats and 3 Green Party Members. It is widely expected that there will be a change in administration. We would respectfully ask that you consider our response to the Regulation 19 submission draft new Local Plan for 2026-39 in the light of this situation. We have had to submit our responses to Regulation 19 by 3rd March. We had called on 2nd February for an Extraordinary Meeting of Council, which the Chairman arranged to be held following the Budget Meeting on Thursday 2nd March. In that Meeting we had hoped to persuade Members across all parties to pause the Plan making process until we knew what the outcome of the Government's consultation on an update to the NPPF would be, as several other LPAs have done, including the Secretary of State's own LPA (Surrey Heath DC) which is in exactly the same stage as ours and also has a very similar political composition as ours. It too is facing all-out elections in May. We have therefore had only one day to finalise our response, which is enclosed. However, we had assumed that our Motion to Full Council last night would not find support, hence this letter.

	<p>We also have concerns about the soundness of the evidence that has led to the choice of the one new strategic housing site in the District, following the need that arose in 2020 to abandon the previous preferred strategic site on the West Berkshire / Wokingham Borough border. Grazeley was withdrawn owing to changes in the Atomic Weapons Establishment's policies on its development safety zones preventing new development in them.</p> <p>The decision to delegate to our officers the signing off of the Submission of the Plan to PINS was made on 1st December. That was before it was known that there was about to be an NPPF consultation running in parallel to our Reg. 19 consultation. It was also before the 6th December Ministerial Letter and the January Chief Planner's Newsletter in which it said there will be a further major update to NPPF later in 2023.</p> <p>Only if our officers deemed there to be non-editorial changes made between that date and the date of submission were they to refer the Plan back to Full Council. The fact that you are now reading this letter means that officers did not refer the Reg. 19 draft Plan back to Full Council at its additional and final pre-election meeting set for 16th March. However we believed it would be extremely challenging for our officers to collate and summarise all responses made to the Regulation 19 draft before the Pre-Election Period. If they did find it necessary to refer the Plan back to Full Council it must nevertheless have been decided by Council to submit.</p> <p>You may now find upon contacting this Council that the political leadership has changed and that Liberal Democrats have now formed the Administration. If that is the case, we would like to advise you that it is our clear and publicly known intention to ask the newly elected Council to pause the process for a few months while we review the Plan that was submitted.</p> <p>We would respectfully ask you to consider our submitted comments as those of the new Council, which may not necessarily find agreement across the Chamber. We will have asked Council to do so, so that our officers will, as from after the first meeting of the new Council, be expected to work to our policy direction during any future Examination of the Plan. Note that hitherto and in this response we have not had the benefit of professional officer support.</p> <p>However, please note that during the passage of the draft emerging Plan through this Council's internal processes, there have been few disagreements on major strategic policies. We do not wish the Plan to be found unsound, but we sincerely hope that you will find it possible to favourably consider our responses, to the few policies where we have concerns, as the basis of Modifications that you will ask us to make in order that we can adopt a new Plan in a timely fashion. Our priority is to help our District better tackle climate change, through having a robust new Local Development Plan to take us through to 2039.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hathor Property Limited (Represented by Turley Associates)
<p>Consultee Full Name</p>	Fred Schiff

Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1813
Chapter / Policy / Appendix Number	1
Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	<p>Soundness of the Regulation 19 Consultation</p> <p>The decision to take forward the Proposed Submission Regulation 19 LPR to consultation took place at a Full Council meeting in December 2022, yet the HELAA report containing the assessment of all sites was not published until January 2023. This means that Full Council made a decision to take forward the Proposed Submission LPA including proposed site allocations, without having had sight of the updated HELAA (2023). The HELAA that would have been available at the time of the Full Council meeting was dated December 2020.</p> <p>Hathor Property therefore question the soundness of the proposed allocations, in the absence of Members having access to the full evidence base for the site selections when taking the decision to proceed with the Regulation 19</p> <p>Local Plan Period</p> <p>NPPF (2021) paragraph 22 requires strategic policies should look ahead over a <u>minimum</u> 15 year period from adoption (our underlining). The proposed LPR period runs to 2038/39 which will mean that the LPR would need to be adopted in 2023/24 if it is to be consistent with the NPPF.</p> <p>However, given the need to allow for formal submission and Examination, and any preliminary matters the Inspector may want to review, and subsequent modifications, it is highly unlikely the LPR will be adopted a year from now. Therefore, in order to ensure the plan period is consistent with national policy then an extra year should be added with the plan period ending in 2039/40.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst NDP Group
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst NDP Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1732
Chapter / Policy / Appendix Number	1

Chapter / Policy / Appendix Title	Introduction and Background
Order	2
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	General Observations: The aim of delivering carbon neutral by 2030 and thereafter is encouraging. We welcome recognition of the outstanding value of the North Wessex Downs landscape and the abundant biodiversity in settlements and surrounding countryside. Policy wording changes generally improve the readability and effectiveness of the plan. Maps - Maps throughout the document have no scale. Some have no North indicator. Size of text makes crown copyright illegible.

	<p>Policy wording - Some policies are more than a page long and contain multiple paragraphs. Paragraphs within policies are not numbered, making it difficult to precisely reference them.</p> <p>Local Plan Map - Too many layers are displayed simultaneously- it is impossible to accurately read detail on the map. For instance, the settlement boundary through Tilehurst Parish has been reviewed and (we believe) is largely unchanged- but we cannot accurately see what (if any) differences there are from the current settlement boundary. Without road detail displayed, the site of the proposed retail park designation in Calcot is unclear and we cannot comment on the detail of its proposed outline.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

2 Context

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1405
Chapter / Policy / Appendix Number	2
Chapter / Policy / Appendix Title	Context
Order	3
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	Constraints do not include all the major constraints on development in the district
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Section should be expanded to include the constraints imposed by the flood plains and the Detailed Emergency Planning Zones (DEPZs) around the two Atomic Weapons Establishments. Also, the nutrient neutrality zones should be included.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Our Vision

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rivar Ltd (Represented by Pro Vision)
Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS568
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:37:00
Attached Files	Pro Vision (Rivar) full response.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Vision confirms that the Council will make available "...housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability" [our emphasis]. The 'Housing' objective explains that a key objective of the Plan is to meet its housing need by providing a range of housing, including affordable housing.</p> <p>Please see accompanying statement for our full representations. In brief, the housing target is insufficient to boost the supply of housing and provide flexibility, address affordability and need for affordable housing in the district and the housing supply would likely lead to a housing shortfall below the LHN, particularly due to reliance on windfall sites and the large strategic sites.</p> <p>As such, the Council's strategic policies of the Local Plan (i.e. Policy SP12 and the strategic site allocations etc.) do not currently deliver the Plan's vision and objectives and are unsound.</p> <p><Full response attached but does not include specific comments on the Vision or Objectives></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please see accompanying statement for our full representations.</p> <p>There is justification that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10 - 20% buffer/uplift to the minimum LHN). This level of housing will ensure sufficient flexibility to deliver the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire. As such, the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy.</p> <p><Full response attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Harry West Investments Ltd</p>
<p>Consultee Full Name</p>	<p>Harry West Investments Ltd</p>
<p>Consultee Organisation</p>	<p>Harry West Investments Ltd</p>

Agent Full Name	Kay Collins
Agent Organisation	Solve Planning
Comment ID	PS392
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	The Regulation 19 plan sets out a vision for the emerging plan to be brought forward. As set out below with regards to the specific areas of this consultation, we consider the plan's aims for providing for housing in the main towns of the district to be a sound one. Proposed Vision In general, we support the proposed vision that seeks to provide sufficient housing in the Borough along with the aim of approaching development based on three spatial areas. The vision states the aim of ensuring that development should be well connected to local services and facilities.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Racecourse (Represented by Pro Vision)
Consultee Full Name	Newbury Racecourse
Consultee Organisation	Newbury Racecourse
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS523
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:14:00
Attached Files	Pro Vision (Newbury Racecourse).pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Vision confirms that the Council will make available "...housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability" [our emphasis]. The 'Housing objective explains that a key objective of the Plan is to meet its housing need by providing a range of housing, including affordable housing.</p> <p>Please see accompanying statement for our full representations. In brief, the housing target is insufficient to boost the supply of housing and provide flexibility, address affordability and need for affordable housing in the district and the housing supply would likely lead to a housing shortfall below the LHN, particularly due to reliance on windfall sites and the large strategic sites.</p> <p>As such, the Council's strategic policies of the Local Plan (i.e. Policy SP12 and the strategic site allocations etc.) do not currently deliver the Plan's vision and objectives and are unsound.</p> <p><Accompanying statement attached></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Please see accompanying statement for our full representations.

	<p>There is justification that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10 - 20% buffer/uplift to the minimum LHN). This level of housing will ensure sufficient flexibility to deliver the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire. As such, the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy.</p> <p><accompanying statement attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS235
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a</p>	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As set out in the previous representations, we are supportive of West Berkshire's vision set out in paragraphs 3.1 to 3.4 of the Local Plan Review Consultation document. We strongly agree with the Council's priority to make available housing of different types, sizes, tenures and affordability. In addition to focusing most of the growth in the urban areas the Council should look to all settlements and available land within the district in sustainable locations to help meet this priority.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hayter, Lynn
Consultee Full Name	Lynn Hayter
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS682
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:43:39
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	No

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>In the consultation portal the strategy outlined by West Berkshire Council (WBC) seems to be that the Area of Outstanding Natural Beauty (AONB) must not have any new housing or work opportunities built in it.</p> <p>Figure 1 West Berkshire Constraints shows that the majority of West Berkshire is covered by the AONB and WBC seem to have decided that a very small part of the district, concentrated around Newbury, Thatcham and Reading, must contain all of the new housing and work opportunities for the foreseeable future.</p> <p>WBC has failed to properly investigate alternative places in the district for development and have dismissed out of hand anywhere else but north-east Thatcham, south Newbury and Reading.</p> <p>This is an unsustainable plan for the future and goes against the idea of providing a pleasant place for everyone to live and work. The best way to deliver a good place for everyone to live and work is to develop new small-scale housing and business premises in all villages and settlements, so that people can live and work more locally.</p> <p>For the future the nation will need to grow food and create energy for living much closer to where people live and work and a completely new approach will be needed to ensure that this is done for the benefit of everyone. The idea of keeping all new housing and business development concentrated around Newbury, Thatcham and Reading will not be sustainable into the future..</p> <p>The idea that the AONB must not have any new housing and business development built in it is completely flawed. Villages and settlements need to have new housing and work opportunities so that they will be able to accommodate future generations of current families, otherwise they will continue to be the preserve of only very wealthy people thereby forcing new generations out of these communities.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS777
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>CHPT 3 - SHAPING WEST BERKSHIRE: VISION & OBJECTIVES</p> <p>OUR VISION</p> <p>Currently we have more than One Vision Document mentioned within the Main Submission and the Evidence Base.</p> <ul style="list-style-type: none"> The Vision to 2036 https://citizen.westberks.gov.uk/media/46989/West-Berkshire-Vision-2036-2019/pdf/WBV_2036_final_19.pdf?m=636903249717100000 <ul style="list-style-type: none"> https://www.westberks.gov.uk/media/53790/West-Berkshire-Visioning-November-2022/pdf/West_Berkshire_Visioning_Document_November_2022.pdf?m=638103394978730000 https://www.westberks.gov.uk/newbury-vision West Berkshire Strategic Vision to 2050 – the Icen work which is part of the Evidence Base for this LPR, which in fact does not cover the whole of West Berks so is incorrectly titled. This piece of work got off to a rocky start as the Inputs Survey was launched via a Facebook Advert and not through the WBC Newsletters or Consultation/Survey Portal. <p>https://www.westberks.gov.uk/media/53832/West-Berkshire-Visioning-Baseline-Report-March-2022/pdf/West_Berkshire_Visioning_-_Baseline_Report_March_2022.pdf?m=638055061124700000</p> <ul style="list-style-type: none"> https://www.westberks.gov.uk/media/53831/West-Berkshire-Visioning-Socio-Economic-Report-March-2022/pdf/West_Berkshire_Visioning_-_Socio-Economic_Report_March_2022.pdf?m=638055061032800000 <p>This makes commenting on Visions quite complex and having asked a question to Executive I am no clearer.</p> <p>Having studied the Transport for Southeast SIP 2050 and the Solent to Midlands Sup Doc, and the new Draft Local Transport Plan (LTP4) Strategy 2024-2039, I have a concern that the minor Transport Improvements planned for the Highways England Network , and the Newbury & Thatcham Spatial Area will not be sufficient to allow that Spatial Area to function effectively and efficiently ,and Visions in this respect will be hard to achieve.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	BioCap (Ed Cooper)
Consultee Full Name	Ed Cooper
Consultee Organisation	BioCap
Agent Full Name	
Agent Organisation	
Comment ID	PS739
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:46:03
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>NPPF C1 Understand and relate well to the site, its local and wider context</i></p> <p><i>Context Looking Forward</i></p> <p><i>prioritise nature so that diverse ecosystems can flourish to ensure a healthy natural environment that supports and enhances biodiversity;</i></p> <p>We believe across West Berkshire there is an opportunity to make real benefits and gains in the wider countryside to reverse biodiversity loss but this needs the proactive help of planners encouraging local off-site high quality habitat creation and linkage schemes, as is happening in other local authority areas.</p> <p>The local plan does not place a high enough emphasis on nature and biodiversity in relation to the creation of high quality and enduring nature and habitats in relation to biodiversity net gain requirements.</p> <p>The WBC method of managing biodiversity seems to mainly involve policing on-site habitat activity which the Biodiversity Metric may score well in the first instance but would in fact be severely negatively impacted over the 30 year period due to recreational/domestic/residential/business activities and pressures on and around sites.</p> <p>Also, regarding economic activity and employment, Natural England's BNG Brochure states: https://naturalengland.blog.gov.uk/wp-content/uploads/sites/183/2022/04/BNG-Brochure_Final_Compressed-002.pdf</p> <p>For landowners BNG can create long-term income opportunities through investment in habitat management. BNG generates sustainable and long-term financing for habitat management and maintenance, providing certainty and creating jobs.</p> <p>Restoring habitats via BNG can act as a green finance mechanism, delivering wider economic benefits and increasing financial and natural capital asset values. By creating bigger and better natural capital assets the resilience and flow of ecosystem services, and the benefits society receive from them, will be enhanced, and the value received from nature maintained and increased.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We believe there is an opportunity to make real benefits and gains in the wider countryside to reverse biodiversity loss but this needs the proactive help of planners encouraging local off-site high quality habitat creation and linkage schemes as is happening in other local authority areas.</p> <p>The local plan does not place a high enough emphasis on nature and biodiversity in relation to the creation of high quality and enduring nature and habitats in relation to biodiversity net gain requirements.</p> <p>The WBC method of managing biodiversity seems to mainly involve policing on-site habitat activity which the Biodiversity Metric may score well in the first instance but would in fact be severely negatively impacted over the 30 year period due to recreational/domestic/residential/business activities and pressures on and around sites.</p> <p>For landowners BNG can create long-term income opportunities through investment in habitat management. BNG generates sustainable and long-term financing for habitat management and maintenance, providing certainty and creating jobs.</p> <p>Restoring habitats via BNG can act as a green finance mechanism, delivering wider economic benefits and increasing financial and natural capital asset values. By creating bigger and better natural capital assets the resilience and flow of ecosystem services, and the benefits society receive from them, will be enhanced, and the value received from nature maintained and increased.</p> <p>WBC's local plan should place more emphasis on the employment and diversification into green jobs that can come with a greater emphasis on local high quality biodiversity off-site compensation for development.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	Yes

* No	
5. Independent Examination	<p>We believe there is an opportunity to make real benefits and gains in the wider countryside to reverse biodiversity loss but this needs the proactive help of planners encouraging local off-site high quality habitat creation and linkage schemes as is happening in other local authority areas.</p> <p>The local plan does not place a high enough emphasis on nature and biodiversity in relation to the creation of high quality and enduring nature and habitats in relation to biodiversity net gain requirements.</p> <p>The WBC method of managing biodiversity seems to mainly involve policing on-site habitat activity which the Biodiversity Metric may score well in the first instance but would in fact be severely negatively impacted over the 30 year period due to recreational/domestic/residential/business activities and pressures on and around sites.</p> <p>For landowners BNG can create long-term income opportunities through investment in habitat management. BNG generates sustainable and long-term financing for habitat management and maintenance, providing certainty and creating jobs.</p> <p>Restoring habitats via BNG can act as a green finance mechanism, delivering wider economic benefits and increasing financial and natural capital asset values. By creating bigger and better natural capital assets the resilience and flow of ecosystem services, and the benefits society receive from them, will be enhanced, and the value received from nature maintained and increased.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1177
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	Yes

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p><Referencing Paragraph 3.4></p> <p>We welcome reference to conserving and enhancing heritage assets. Note that the built environment is not synonymous with the historic environment. Therefore, we suggest addition of the word "historic" in the final sentence of this paragraph</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Heritage assets will be conserved and enhanced and there will be greater opportunity for enjoyment and appreciation of the special qualities of the built, <u>historic</u> and natural environment.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chieveley Parish Council
Consultee Full Name	Kim Lloyd
Consultee Organisation	Chieveley Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1494
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Chieveley Parish Council broadly agrees with the vision presented (3.1-3.4) Strategic Objectives of the plan (3.5) and in particular, that the landscape in the North Wessex Downs should remain of outstanding value (3.4).</p> <p>The plan must continue to conserve and enhance the North Wessex Downs AONB in accordance with national policies</p> <p>Any landscape-led development should be both appropriate within that policy context and deliver wider environmental, economic, and social benefits. These requirements should also have regard to local needs.</p> <p>In particular CPC supports the following elements of the vision and Strategic Objectives: Making available carbon neutral housing of different types, sizes, tenures and affordability ... and Strategic Objective 1. High quality design that is in keeping with the character and local distinctiveness of the area... and Strategic Objective 3. West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside. and Strategic Objective 8.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Panattoni (Represented by Turley Associates)
Consultee Full Name	Mr Tony Watkins
Consultee Organisation	Panattoni
Agent Full Name	Taylor Cherrett
Agent Organisation	Turley Associates
Comment ID	PS1235
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	We do not believe the plan is legally compliant in relation to its assessment of employment provision within the Sustainability Appraisal.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The Vision of the Plan states that West Berkshire will provide the space and environment for employment opportunities and:</p> <p>“A variety of different sectors together with a combination of larger businesses and small and medium-sized enterprises will ensure a resilient and sustainable economy. The local economy will help to create benefits for the environment, culture and social well-being.”</p> <p>The Vision goes on to say:</p> <p>“Development will be better connected to local services, facilities and open space within the District, and where relevant in adjoining local authority areas, by favouring more sustainable means of travel including reducing the need to travel, all of which will foster community cohesion, health and wellbeing.”</p> <p>Strategic Objective 4 relates to the economy and notes:</p> <p>“To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.”</p> <p>Panattoni support the Vision and Objectives set out within the Local Plan but raise significant concerns about whether these can actually be met given that the Council have acknowledged that there remains a shortfall of 32,709sqm of industrial land which is not met through allocations in the Plan.</p> <p>The failure to allocate land to meet this shortfall does not comply with paragraph 82(b) of the NPPF which notes that planning policy should “set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period” [our emphasis]</p> <p>It is Panattoni’s position that additional land needs to be allocated to at least meet the shortfall and provide a sufficient buffer to ensure a resilient economy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed employment allocation and that the LPR does not provide enough sites to provide sufficient employment land.</p> <p>We can assist the inspector in their consideration of the Local Plan and associated evidence.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	Yes

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sulham Estate (Represented by Barton Willmore now Stantec)
Consultee Full Name	Mr Henry Scutt
Consultee Organisation	Sulham Estate
Agent Full Name	Ms Patricia Terцерio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1634
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>On the scope of the Regulation 18 Consultation we noted the key themes within Council's Vision and, in particular, the focus on community cohesion, health and wellbeing. The energy efficiency, landscape, heritage and biodiversity elements of the vision are also noted. These key themes continue to be a part of the Council's Vision on the Draft Local Plan currently being consulted on, and this is welcomed.</p> <p>In relation to the key themes of the vision, we consider that our Client's site, Land at Hall Place Farm, is highly consistent and offers the opportunity to realise the separate strands of the vision on a medium sized site which can be delivered in the short to medium term.</p> <p>Land at Hall Place Farm Tilehurst, provides the opportunity to accommodate in the region of 80 new homes, a farm shop, small workshop units (to support small and medium sized enterprises), allotments and new public open space within a sustainable location adjoining the Eastern Urban Area. The majority of the homes are intended to be delivered as private rental which would be retained and managed by the landowner. The landowner has a track-record of providing quality accommodation to very longstanding tenants and believes that the private rented sector can offer a genuine, long-term alternative to homeownership. Please refer to the Vision Document which accompanies these representations and other supporting reports for further information as to the details of the proposal.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	Land at Hall Place Farm Tilehurst is not currently proposed to be allocated within the Regulation 19 Draft Local Plan. Nevertheless, we consider that the site should be identified as an additional allocation in the Local Plan, on the basis that the development proposal offers the opportunity for an exemplar scheme to reflect the Council's Vision for the district.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor

Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1703
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1703 Thatcham Town Council _Press Release Aug 21.docx PS1703 Thatcham Town Council_Attachment 10_Comments to Iceni Projects.pdf PS1703 Thatcham Town Council_Attachment 8_Vision 2050 spec.pdf PS1703 Thatcham Town Council_Attachment 9_Thatcham Town Council Initial Response.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The revision of the NPPF in July 2021 introduced a new requirement into paragraph 22:</p> <p>“Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery.”</p> <p>West Berkshire Council concluded that this change required it to pause the Regulation 19 consultation of the Local Plan in order for it to undertake additional work to support this new requirement. The press release announcing this is reproduced below.</p> <p>West Berkshire Council then commissioned Iceni Projects Ltd to undertake this work. The specification for this project describes it as follows (the full specification is Attachment 8 to these representations <see attached document- PS1703 Thatcham Town Council_Attachment 8_Vision 2050 spec.>):</p> <p>“West Berkshire District Council (WBDC) wishes to procure consultancy services to deliver focussed visioning work for two settlements to support the Local Plan Review (LPR) 2021 - 2037; Newbury where the strategic site Sandlesford (circa 1,500 dwellings) is proposed and Thatcham where the strategic site, North East Thatcham (circa 2,500 dwellings) is proposed.</p> <p>The visioning will support the spatial strategy for the West Berkshire LPR.”</p> <p>The three reports by Iceni Projects form part of the Evidence Base for the Local Plan Review:</p> <ul style="list-style-type: none"> - West Berkshire Vision – Local Plan Review; Baseline Report - Newbury & Thatcham – Socio-economic baseline & property market assessment - West Berkshire Strategic Vision 2050 (though this is missing its Appendix 1 and 2) <p>The two baseline reports contained significant errors and shortcomings. Town Councillors spent a considerable time reviewing these documents, and the Council provided detailed corrections and comments to Iceni (this is provided as Attachment 9 to these representations <see attached document - PS1703 Thatcham Town Council_Attachment 9_Thatcham Town Council Initial Response>). However, neither document has been updated. The most obvious error is that the statement “Thatcham is an historic market town approximately 3 miles west of Newbury” (rather than east). This is such an obvious error that it suggests that these documents were not properly reviewed either by Iceni or West Berkshire Council.</p> <p>Since the report was commissioned, the definition of the number of dwellings for North East Thatcham has changed but it is clear that it is still a significant extension to an existing town (as also is Sandlesford Park). The inclusion of these reports by West Berkshire Council in the evidence base indicates that it believes that the new provision in paragraph 22 of NPPF is still applicable.</p> <p>However, there is no mention whatsoever of this visioning work in the Local Plan Review Proposed Submission (January 2023). Nothing in this document looks beyond the end of the next plan period in 2039. Paragraph 1.26 explicitly states this:</p> <p>“1.26 The LPR includes a vision, strategic objectives and a set of policies which together provide a policy framework for assessing planning applications and guiding development across West Berkshire. It is set out as follows:</p> <p>... Our Vision of what West Berkshire will look like in 2039...”</p> <p>The Iceni reports are also not mentioned in Paragraph 4.5 “Key pieces of evidence” for the “Development Strategy: Our place based approach” – i.e. the spatial strategy.</p> <p>It therefore appears that the Vision 2050 study was commissioned as a ‘tick-box exercise’, to give the token appearance of compliance with NPPF Paragraph 22, rather than to provide a basis for the development of policies within the plan. Therefore, Local Plan Review Proposed Submission (January 2023) cannot as a whole be in compliance with Paragraph 22 of NPPF.</p> <p>As the Appendices to the West Berkshire Strategic Vision 2050 are missing from the evidence base for the Regulation 19 consultation, the detailed comments made by Thatcham Town Council in response to the survey by Iceni are provided as Attachment 10 (See attached document - PS1703 Thatcham Town Council_Attachment 10_Comments on Iceni Report).</p> <p>(Image of West Berkshire Press Release on postponement of Local Plan Review attached - PS1703 Thatcham Town Council_Press Release Aug 21)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>Paragraph 22 requires that policies should be set within a vision that looks further ahead (at least 30 years)” and this ‘setting’ is totally absent from the Local Plan Review Proposed Submission (January 2023).</p> <p>To remedy this requires a review of many of the policies within the document, which is beyond what can be addressed through modification at examination.</p> <p>It is clear that the Local Plan is therefore “not ready for independent examination”. Therefore, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004, West Berkshire Council must not submit it to the Secretary of State for examination.</p>
<p>5. Independent Examination - If your representation is seeking a</p>	<p>Yes</p>

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	<p>Thattham Town Council is the principal representative body of the community of Thattham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1599
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Paragraph 3.2 (Provision of Housing) – Thakeham agrees with the importance of delivering a range of housing, and agrees that they need to come forward in the most sustainable locations, which is why it is critical that the allocated sites set out in the Reg 19 Local Plan are available, suitable and achievable and therefore deliverable. This is even more important for the villages in the AONB where the presumption in favour of sustainable development does not apply, and therefore windfall applications are unlikely to come forward outside of the Development Plan. We are also supportive of newly proposed text that housing be made "carbon neutral", which falls in line with our own sustainability objectives to provide carbon neutral construction and net zero lifetime use homes from 2025.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wallis Trustees (Represented by Carter Jonas)
Consultee Full Name	Frank Wallis Estate Trustees
Consultee Organisation	Wallis Trustees
Agent Full Name	Steven Sensecall
Agent Organisation	Carter Jonas
Comment ID	PS1378
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Carter Jonas generally supports the proposed Vision and Strategic Objectives of the Local Plan Review and considers that an additional allocation for residential development east of Waller Drive, Newbury will help realise the Plan's strategic objectives by:</p> <ul style="list-style-type: none"> • Mitigating and adapting to the effects of climate change • Providing a range of sites to ensure that the district's housing need and aspirations are met by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations • Providing sustainable development of high quality design, construction and efficiency contributing to an attractive, safe and accessible environment for all • Supporting a strong, diverse and sustainable economy during construction and occupation • Helping to enhance the vitality and viability of Newbury through the increased population • Conserving and enhancing the local distinctive character, identity, significance and special interest of the built, historic and natural environment through sympathetic and complimentary development establishing new public rights of way and play space • Providing appropriate landscape led development outside the AONB delivering wider environmental, economic and social benefits • Enhancing and contributing to West Berkshire's strong network of multi-functional green infrastructure providing health and environmental benefits and enhancing the overall quality of life of sustainable communities • Promoting low emission transport choices including active travel and enhancing of cycle networks • Contributing to reasonable infrastructure enhancements where necessary to support the development.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1519
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	Croudace strongly supports the proposed Vision set out at Chapter 3, to make available housing of different types, sizes, tenures and affordability a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	JPP Land Ltd (Represented by Woolf Bond Planning)

Consultee Full Name	JPP Land Ltd
Consultee Organisation	JPP Land Ltd
Agent Full Name	Mr Douglas Bond
Agent Organisation	Woolf Bond Planning
Comment ID	PS1543
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Vision
Order	5
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>In our response to the December 2018 version of the Draft Local Plan, we highlighted our concern regarding the inconsistency of the Council's proposed vision with the approach of the NPPF, particularly paragraph 78). This relates to the failure of the proposed vision to effectively support growth in villages. The revision to the vision (particularly the second paragraph) which includes references to both towns and villages is therefore consistent with national advice, as is the allocation of our client's land north of Bath Road, Woolhampton. The proposed vision for the Local Plan is therefore endorsed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Our Strategic Objectives

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS234
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We note the second strategic objective 'Housing' has been amended to be more specific and less broad. We support the provision of a range of sites to ensure the District's housing needs are met in appropriate and sustainable locations. Such an amendment may assist with the achievement and maintenance of a five-year housing land supply. As highlighted previously, through the allocation of a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure they are not vulnerable to unsustainable, speculative development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Theale Parish Council
<p>Consultee Full Name</p>	Theale Parish Council
<p>Consultee Organisation</p>	Theale Parish Council
<p>Agent Full Name</p>	Samantha Haywood
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS588
<p>Chapter / Policy / Appendix Number</p>	
<p>Chapter / Policy / Appendix Title</p>	Our Strategic Objectives
<p>Order</p>	6
<p>Submission Type</p>	E-Mail

<ul style="list-style-type: none"> * E-Mail * Letter * Other * SMS * Web * Unknown 	
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? <ul style="list-style-type: none"> * Yes * No 	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. <ul style="list-style-type: none"> * Yes * No 	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. <ul style="list-style-type: none"> * Yes * No 	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. <ul style="list-style-type: none"> * Yes * No 	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. <ul style="list-style-type: none"> * Yes * No 	
Please give reasons for your answer	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>1. Strategic Objectives – 3.5.2. An affordable housing survey needs to be carried out and the need ascertained in Theale parish, and a district wide survey, so that the Plan statement is backed by evidence.</p> <p>2. Strategic Objectives – 3.5.5. The Plan implies that a shopping centre makes a community prosperous but we believe it takes a lot more to build a community from social, health and wellbeing etc. Theale has always been overlooked for leisure and community activities. There is also a lack of access and public transport in Theale to be able to support large scale development.</p>

	3. Strategic Objectives – 3.5.11. Theale has very little infrastructure, certainly not enough to support a large number of new housing. The Plan states that infrastructure is part of it but there are no specifics mentioned and they need to be included in the Plan. Also, the 'catch up' plans for new housing that has already been developed or approved as Theale has had significant development but to improvement/additions to infrastructure with the exception of the primary school.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Kimberley Parry
Agent Organisation	Neame Sutton Ltd
Comment ID	PS629
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:08:00
Attached Files	Neame Sutton (Donnington New Homes) Appendix A.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The strategic objectives and housing requirement set out in the Submission Plan are addressed in the Representations to the West Berkshire Local Plan Review Consultation (Regulation 19) Matters Relating to Housing Needs and Supply, prepared by Pegasus Group (January 2023) (Appendix A) and are not, as a result, repeated here.</p> <p>The analysis by Pegasus Group highlights the shortcomings of the Submission Plan with reference to housing provision:</p> <ul style="list-style-type: none"> • An insufficient buffer to allow for flexibility and to ensure that the local housing need (LHN) is met in full over the Plan period. • A larger buffer could be provided with no additional negative affects against the Sustainability Appraisal objectives and would provide additional positive benefits. • The current unmet need of Reading is not adequately provided for. • The likely future unmet need of Reading should be planned for now, and the Submission Plan should include flexibility to provide for that need as part of the Duty to Co-operate. • There is a clear case for an uplift to the housing provision to account for the identified affordable housing need of the area. • The reliance on a single, large strategic site for the delivery of most of the residual housing requirement, emphasises the need for a sufficient buffer to offset the potential under-delivery of the Plan. • A potential shortfall in the five-year housing land supply from the intended date of adoption of the Plan. <p>It is clear, as a result, that there is an urgent need for more housing in West Berkshire and, therefore, a need to increase the housing requirement within the Submission Plan.</p>

	<p>Should the Council not take this opportunity to address the urgent need for more housing, it is likely that the Submission Plan will fail to meet the necessary test of soundness in terms of providing an effective and justified housing delivery strategy, which meets the needs of the community over the Plan period.</p> <p>Of fundamental importance is the issue of unmet need from Reading. The failure of the Council to address the unmet need arising from Reading, now and in the future, puts the Submission Plan at risk of failing the necessary Legal Compliance test. A failure in terms of Legal Compliance cannot be addressed retrospectively through modifications in the same way that a matter of soundness can. If the Submission Plan fails the Legal Compliance test, the examination cannot continue, and the plan making process must recommence.</p> <p>The unmet need arising from Reading must, therefore, be fully addressed now.</p> <p>Attachment:</p> <ul style="list-style-type: none"> Appendix A - Repls to WBC LPR consultation Housing Need and Supply Pegasus Group
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The primary amendments necessary for the Submission Plan to be found sound and to meet the Legal Compliance tests are summarised as:</p> <ul style="list-style-type: none"> An increase in the housing requirement to fully account for the local housing need across West Berkshire. Inclusion of a buffer to the housing requirement to insulate against non-delivery during the Plan period. Reconsider the Spatial Strategy to direct more housing to settlements, such as Hungerford, to ensure a better distribution of development, more reflective of the needs of the community. Fully addressing the unmet need arising from Reading to ensure the Legal Compliance test is met. The allocation of further sites to enable a rolling five-year housing land supply, maintained over the Plan Period, of which Donnington New Homes' promotion site at Smitham Bridge Road for approximately 34 new homes and Marsh Lane for allotments, is a prime example of the suitable, available, and achievable sites that can come forward.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	BioCap (Ed Cooper)
<p>Consultee Full Name</p>	Ed Cooper
<p>Consultee Organisation</p>	BioCap
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS742
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:32:52
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Our Government has a high commitment to leaving the environment in a better state than we found it, and to reverse the decline of nature. The 25 Year Environment Plan and the 2023 Environmental Improvement Plan (EIP) both place emphasis on how delivering restored habitats and changes to agricultural practise will boost employment through 'green jobs'. The need to maintain, restore and create biodiverse and flood mitigation habitats and features to mitigate against climate change and contribute

	<p>to biodiversity increases, carbon capture and sequestration within West Berkshire will create a wide range of 'green' jobs. These employment opportunities will be tied to contractual arrangements for 30-100 year maintenance and management requirements of biodiversity and environmental improvements, creating long term employment opportunities.</p> <p>Therefore there needs to be specific policy in this Economic Growth section of the Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Our Government has a high commitment to leaving the environment in a better state than we found it, and to reverse the decline of nature. The 25 Year Environment Plan and the 2023 Environmental Improvement Plan (EIP) both place emphasis on how delivering restored habitats and changes to agricultural practise will boost employment through 'green jobs'. The need to maintain, restore and create biodiverse and flood mitigation habitats and features to mitigate against climate change and contribute to biodiversity increases, carbon capture and sequestration within West Berkshire will create a wide range of 'green' jobs. These employment opportunities will be tied to contractual arrangements for 30-100 year maintenance and management requirements of biodiversity and environmental improvements, creating long term employment opportunities.</p> <p>Therefore there needs to be specific policy in this Economic Growth section of the Local Plan.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Wallis Trustees (Represented by Carter Jonas)
<p>Consultee Full Name</p>	Frank Wallis Estate Trustees
<p>Consultee Organisation</p>	Wallis Trustees
<p>Agent Full Name</p>	Steven Sensecall
<p>Agent Organisation</p>	Carter Jonas
<p>Comment ID</p>	PS1379
<p>Chapter / Policy / Appendix Number</p>	
<p>Chapter / Policy / Appendix Title</p>	Our Strategic Objectives
<p>Order</p>	6
<p>Submission Type * E-Mail</p>	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Carter Jonas generally supports the proposed Vision and Strategic Objectives of the Local Plan Review and considers that an additional allocation for residential development east of Waller Drive, Newbury will help realise the Plan's strategic objectives by:</p> <ul style="list-style-type: none"> • Mitigating and adapting to the effects of climate change • Providing a range of sites to ensure that the district's housing need and aspirations are met by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations • Providing sustainable development of high quality design, construction and efficiency contributing to an attractive, safe and accessible environment for all • Supporting a strong, diverse and sustainable economy during construction and occupation • Helping to enhance the vitality and viability of Newbury through the increased population • Conserving and enhancing the local distinctive character, identity, significance and special interest of the built, historic and natural environment through sympathetic and complimentary development establishing new public rights of way and play space

	<ul style="list-style-type: none"> • Providing appropriate landscape led development outside the AONB delivering wider environmental, economic and social benefits • Enhancing and contributing to West Berkshire's strong network of multi-functional green infrastructure providing health and environmental benefits and enhancing the overall quality of life of sustainable communities • Promoting low emission transport choices including active travel and enhancing of cycle networks • Contributing to reasonable infrastructure enhancements where necessary to support the development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1520
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 16:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Croudace also supports the strategic objectives set out at Chapter 3, including those relating to: – Housing – providing a range of sites to ensure that housing needs and aspirations are met, by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations; – Sustainable and quality development – providing sustainable developments of high quality design, construction and efficiency (including land use) which contribute to an attractive, safe and accessible environment for all; – Green infrastructure and healthy living – ensuring a strong network of multi-functional green infrastructure which provides health and environmental benefits and enhances the overall quality of life of sustainable communities; – Transport – providing transport networks that support sustainable growth and promote low emission transport choices; – Infrastructure – ensuring infrastructure needs (physical and social) arising from growth are provided to support and keep pace with development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	No

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	Yes
* Yes	
* No	
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS778
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	No

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>CHPT 3 - SHAPING WEST BERKSHIRE: VISION & OBJECTIVES</p> <p>OUR STRATEGIC OBJECTIVES</p> <p>For me there is a huge gap in relation to preservation and enhancement of wildlife habitats for native flora and fauna. Missing is the <u>Objective for NATURE RECOVERY</u>. This should at least be added as a 12th Objective, or the 12 Objectives linked up into fewer more Strategic Objectives.</p> <p>Nature <u>Recovery</u> is not an Objective that seems high on the agenda of WBC and only a small % of their own lands are managed to maximise recovery of Wildlife Habitats. No Current State Assessment of lands has been undertaken and there is very little money in the IDP for Nature Recovery.</p> <p>Knowing from personal experience that the AONB is not rich in natural flora and fauna being mainly large-scale Agriculture & Forestry and subject to Wildlife Crime, and is much depleted, I really think not having Nature Recovery as a Key Objective makes the Legality & Soundness of the plan questionable, given that the high-level contents of the Environment Bill have been known for at least 4 years and enacted in November 2021. Especially as there has been no work on the Green/Blue Infrastructure which was promised in the Old Plan.</p> <p>Objective 4 – Economy - would be more focused and measurable if it was Employment & Economic Development</p> <p>Objective 5 – Town Centres - clearer if it was Settlement Centres and it listed those in-scope for the duration of this plan. And somewhere within the Policies in this Plan we need clear identification of Settlements that are designated as Rural. As Centre Designs will vary between Urban & Rural.</p> <p>Objective 6 – Culture - could be Leisure & Culture as the 2022 Leisure Strategy is not submitted within the Evidence base and the Plan is not Effective without it as it identifies Sites for re-development which are not included in the Plan. I believe plans are underway to produce a Leisure & Culture Strategy.</p> <p>Objective 7 – Heritage could be Heritage & Historic Environment as Heritage is an often mis-understood term. Heritage is not defined in the Glossary of Terms.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst Parish Council
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1661
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The modifications to objective 2 (Housing) are welcome- the inclusion of affordable and specialist housing types, tenures and sizes recognizes the changing needs of the community. We approve of the additional wording stating that development should be in appropriate and sustainable locations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	BBOWT
Consultee Full Name	Daniel Tritton
Consultee Organisation	BBOWT
Agent Full Name	
Agent Organisation	
Comment ID	PS1245
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>BBOWT is disappointed that addressing the decline in biodiversity is not listed as one of West Berkshires strategic objectives. The State of Nature 2016 report shows that over half (56%) of the UK's wild species have declined in the past 50 years and continue to do so and that more than one in ten species faces extinction. The UK government's 2018 biodiversity indicators show that the decline in the abundance of 'priority species' continues. Therefore, addressing this issue should be a key strategic objective of West Berkshire's local plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Historic England</p>
<p>Consultee Full Name</p>	<p>Historic England</p>
<p>Consultee Organisation</p>	<p>Historic England</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS1179
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	The heading of objective 7 is "Heritage" whereas the text refers to the built, historic and natural environment. We acknowledge the links between built, historic and natural assets and do not object to this wording; but we'd be happy to discuss this further as appropriate, if the Council wish to amend this in response to consultation feedback.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1312
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Support</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chieveley Parish Council
Consultee Full Name	Kim Lloyd
Consultee Organisation	Chieveley Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1495
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Chieveley Parish Council broadly agrees with the vision presented (3.1-3.4) Strategic Objectives of the plan (3.5) and, in particular, that the landscape in the North Wessex Downs should remain of outstanding value (3.4).</p> <p>The plan must continue to conserve and enhance the North Wessex Downs AONB in accordance with national policies.</p> <p>Any landscape-led development should be both appropriate within that policy context and deliver wider environmental, economic, and social benefits. These requirements should also have regard to local needs.</p> <p>In particular CPC supports the following elements of the vision and Strategic Objectives: Making available carbon neutral housing of different types, sizes, tenures and affordability ... and Strategic Objective 1. High quality design that is in keeping with the character and local distinctiveness of the area... and Strategic Objective 3. West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside. and Strategic Objective 8.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1600
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Paragraph 3.5(2) (Strategic Objectives: Housing) – Following on from paragraph 3.2, Thakeham is supportive of providing the required level of market, affordable and specialist housing types in appropriate and sustainable locations, with all of our developments promising to provide policy compliant levels of affordable housing, with no viability assessments. Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst NDP Group
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst NDP Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1728
Chapter / Policy / Appendix Number	

Chapter / Policy / Appendix Title	Our Strategic Objectives
Order	6
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The modifications to objective 2 (Housing) are welcome- the inclusion of affordable and specialist housing types, tenures and sizes recognizes the changing needs of the community. We approve of the additional wording stating that development should be in appropriate and sustainable locations.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Background

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS258
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Background
Order	8
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It is noted that paragraph 4.5 sets out that the Local Housing Need (LHN) for West Berkshire is 513 dwellings per annum, using a 2022 base date. This figure has not changed since the Regulation 18 consultation document which is hard to believe given two years has passed and the current housing crisis is worsening. This figure should be tested in the Local Plan Examination and due regard should be given to the standard method as well as the duty to cooperate.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	Historic England
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1181
<p>Chapter / Policy / Appendix Number</p>	
<p>Chapter / Policy / Appendix Title</p>	Background
<p>Order</p>	8
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	E-Mail

* Web * Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Reference should be made to Registered Parks and Gardens, for accuracy and consistency with the Policies Map. Figure 1 (or perhaps the Policies map?) should also include Scheduled Monuments.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	In addition, there are other designations including conservation areas and <u>Registered historic</u> parks and gardens...

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1406
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Background
Order	8
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p><i>Para 4.6</i> AWE Detailed Emergency Planning Zones (DEPZs) are not specifically mentioned</p> <p><i>Para 4.7</i> The justification for merging the Eastern and Kennet Valley Spatial Areas is no longer valid. The strict constraint on the building of new homes imposed by the introduction of the DEPZs around the two AWEs means that the merging no longer provides flexibility</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>Para 4.6</i> The text regarding the AWE constraints should be re-worded to include "DEPZs"</p> <p><i>Para 4.7</i> The spatial areas should no longer be merged</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst Parish Council
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1662
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Background
Order	8
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Figure 1 (West Berkshire Constraints) – Map has no scale. Legend refers to DEPZ, but this abbreviation is not explained until 4.16, several pages later in the document.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1601
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Background
Order	8

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	04/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Paragraph 4.5 (Key Pieces of Evidence) – It should be emphasised that Thakeham is concerned with the HELAA stated as being a key piece of evidence in preparation of the Plan, as we consider sites have been assessed on out-of-date information, and while it is appreciated that the HELAA report was updated in January 2023, individual Site information does not seem to have been consistently updated. Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst NDP Group
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst NDP Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1729
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Background
Order	8
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Figure 1 (West Berkshire Constraints) – Map has no scale. Legend refers to DEPZ, but this abbreviation is not explained until 4.16, several pages later in the document.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1347
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Background
Order	8
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	S Pike Attachment 4 - Specification - Vision 2050.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>West Berkshire Strategic Vision 2050</p> <p>[See attached document Attachment 4]</p> <p>The revision of the NPPF in July 2021 introduced a new requirement into paragraph 22: “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”</p> <p>West Berkshire Council concluded that this change required it to pause the Regulation 19 consultation of the Local Plan in order for it to undertake additional work to support this new requirement.</p> <p>West Berkshire Council then commissioned IcenI Projects Ltd to undertake this work. The specification for this project describes it as follows (the full specification is Attachment 4 to my representations):</p> <p>“West Berkshire District Council (WBDC) wishes to procure consultancy services to deliver focussed visioning work for two settlements to support the Local Plan Review (LPR) 2021 - 2037; Newbury where the strategic site Sandleford (circa 1,500 dwellings) is proposed and Thatcham where the strategic site, North East Thatcham (circa 2,500 dwellings) is proposed.</p> <p>The visioning will support the spatial strategy for the West Berkshire LPR.”</p> <p>The three reports by IcenI Projects form part of the Evidence Base for the Local Plan Review:</p> <ul style="list-style-type: none"> - West Berkshire Vision – Local Plan Review; Baseline Report - Newbury & Thatcham – Socio-economic baseline & property market assessment - West Berkshire Strategic Vision 2050 (though this is missing its Appendix 1 and 2) <p>The two baseline reports contained significant errors and shortcomings. I spent a considerable time reviewing these documents on behalf of the Town Council, which then provided detailed corrections and comments to IcenI (this is provided as Attachment 9 to the Town Council’s representations). However, neither document has been updated. The most obvious error is that the statement “Thatcham is an historic market town approximately 3 miles west of Newbury” (rather than east). This is such an obvious error that it suggests that these documents were not properly reviewed either by IcenI or West Berkshire Council.</p> <p>Since the report was commissioned, the definition of the number of dwellings for North East Thatcham has changed, but it is clear that it is still a significant extension to an existing town (as also is Sandleford Park). The inclusion of these reports by West Berkshire Council in the evidence base indicates that it believes that the new provision in paragraph 22 of NPPF is still applicable.</p> <p>However, there is no mention whatsoever of this visioning work in the Local Plan Review Proposed Submission (January 2023). Nothing in this document looks beyond the end of the next plan period in 2039. Paragraph 1.26 explicitly states this:</p> <p>“1.26 The LPR includes a vision, strategic objectives and a set of policies which together provide a policy framework for assessing planning applications and guiding development across West Berkshire. It is set out as follows:</p> <p>... Our Vision of what West Berkshire will look like in 2039...”</p> <p>The IcenI reports are also not mentioned in Paragraph 4.5 “Key pieces of evidence” for the “Development Strategy: Our place based approach” – i.e. the spatial strategy.</p> <p>It therefore appears that the Vision 2050 study was commissioned as a ‘tick-box exercise’, to give the token appearance of compliance with NPPF Paragraph 22, rather than to provide a basis for the development of policies within the plan.</p> <p>Therefore, Local Plan Review Proposed Submission (January 2023) cannot as a whole be in compliance with Paragraph 22 of NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>

4. Proposed Changes	<p>Paragraph 22 requires that policies should be set within a vision that looks further ahead (at least 30 years)” and this ‘setting’ is totally absent from the Local Plan Review Proposed Submission (January 2023).</p> <p>To remedy this requires a review of many of the policies within the document, which is beyond what can be addressed through modification at examination.</p> <p>It is clear that the Local Plan is therefore “not ready for independent examination”. Therefore, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004, West Berkshire Council must not submit it to the Secretary of State for examination.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

The Spatial Areas

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holybrook Parish Council
Consultee Full Name	Pamela Kirkpatrick
Consultee Organisation	Holybrook Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS615
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	The Spatial Areas
Order	10
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:56:54
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	Holybrook has strongly objected to being lumped into one zone with all parishes which are not part of the ANOB or Thatcham and Newbury and this has not been addressed. Combining these, two very distinct in character areas, will create an overly diverse area with a mixture of urban and rural neighbourhoods. The only common factor is that they are not in the ANOB or in Newbury/Thatcham. The Council is concerned that less attention will be paid by planners to the circumstances/constraints of the urban parishes of the Eastern Urban area and this shows a broad-brush approach with more consideration shown for the ANOB and Newbury/Thatcham.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	Many questions raised in previous submissions have not been addressed. So, questions have been asked but thoughtful responses not provided.
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Harry West Investments Ltd
<p>Consultee Full Name</p>	Harry West Investments Ltd
<p>Consultee Organisation</p>	Harry West Investments Ltd
<p>Agent Full Name</p>	Kay Collins
<p>Agent Organisation</p>	Solve Planning
<p>Comment ID</p>	PS393
<p>Chapter / Policy / Appendix Number</p>	
<p>Chapter / Policy / Appendix Title</p>	The Spatial Areas
<p>Order</p>	10
<p>Submission Type</p> <p>* E-Mail</p>	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	28/02/2023 11:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We support the Council's statement that Newbury and the other urban areas will continue to be the main focus for housing and economic development in the District.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Compton Parish Council
Consultee Full Name	Compton Parish Council
Consultee Organisation	Compton Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS330
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	The Spatial Areas
Order	10
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 11:22:20
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	It is impossible to comment as we are neither Legally Qualified nor an expert in LPR Legal Compliance.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The council disagrees with the definition of "Positively Prepared".</p> <p>Plans which are both complex and cross representational boundaries are inherently difficult to deliver and hence "Ineffective"</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	Poor evidence of inclusion of NDPs or co-operation with local communities
<p>4. Proposed Changes</p>	<p>Paragraph 4.14, sentence 4 needs alteration as follows:</p> <p>Hungerford, Lambourn, and Hermitage have designated neighbourhood areas for the preparation of neighbourhood plans, Compton has a designated neighbourhood area for its adopted neighbourhood plan, and the rural service centre of Pangbourne, has limited development opportunities.</p> <p>This is to ensure the Compton Neighbourhood Development Plan, adopted following referendum in Feb 2022, is recognised as being in place, whilst the designated neighbourhood areas for Hungerford, Lambourn and Hermitage are for plans that have not yet been brought to referendum and adopted.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

<p>publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1602
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	The Spatial Areas
Order	10
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on</p>	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Paragraph 4.15-4.16 (Lambourn's Role in the AONB) – Thakeham supports the Council's identification of Lambourn as a key service centre for surrounding rural area, as well as identifying its leading role within the horseracing industry across the country. It is therefore considered that growth to this village is sustainable, to ensure the village continues to thrive and also provide homes to support the specific local need of those within the horseracing industry.</p> <p>Paragraph 4.17 (Existing Allocations in the AONB) – Thakeham is concerned that, despite being allocated in an adopted Plan in 2017, a number of the allocations in the AONB have not been delivered.</p> <p>The West Berkshire Core Strategy (2012) ("the Core Strategy") sets out a housing requirement of 'at least' 10,500 net additional dwellings from 2006 to 2026. Whilst the Core Strategy allocates strategic development sites, the Housing Site Allocations DPD 2006-2026 ("HSA DPD") was prepared to allocate non-strategic sites to help meet the housing need across the Plan Period.</p> <p>The Housing Delivery and Trajectory within Appendix 1 of the HSA DPD notes the expected delivery from the HSA DPD allocations across the Plan Period to be 1,650; thus confirming all of the HSA DPD allocations were expected to be delivered by 2026. It is also confirmed on page 107 of the HSA DPD that a new Local Plan will cover the period up to 2036 and will need to consider allocating new sites and to look again at the proposed housing distribution. The Council's latest Annual Monitoring Report (January 2023) confirmed that as of 31/03/22 1,539 dwellings had been permitted on the HSA DPD sites, however, completions totalled only 388 dwellings. With 3 years remaining in the Plan Period, it is unlikely that the delivery of the HSA DPD sites will accord with expectations.</p> <p>Detailed analysis of these sites and the reason for lack of delivery needs to be understood, and if appropriate the allocations deleted or supported by new, available and deliverable Sites. Again, it is considered this is even more important for settlements within the AONB, where windfall applications are unlikely to come forward. For example, Thakeham is concerned that of the 26 sites allocated within the HSA DPD in 2017, HSA 6 and specifically HSA 19 which is located in Lambourn, have not advanced a planning application. Notwithstanding this, Thakeham is not aware that the achievability and deliverability of these sites has been reassessed, however the Council proposes the sites to be 'carried forward' into the Local Plan Update. This would effectively grant an allocation on these sites for a total period of 22 years (2017-2039), when there is evidence that suggests these sites might not be deliverable. Thakeham does not consider this to be a sound approach to allocating land for development.</p> <p>Paragraph 4.17 also emphasises the role of neighbourhood planning, stating that: "<i>additional development for the period beyond 2026 will therefore be limited and will come in part through allocations within the NDPs.</i>" Whilst Thakeham is wholly supportive of neighbourhood plans and their ability to drive community-led growth, it is also our understanding that they can be slow to come forward. Therefore, in Settlements within the AONB, where existing allocations are proving slow to deliver, Thakeham would advocate the Reg 19 Local Plan considering additional supporting sites to ensure growth is not stunted by undeliverable allocations.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 1 Spatial Strategy

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS236
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>No further comments to be made in addition to those made in response to the Regulation 18 consultation document (<i>see attachment</i>), however it is emphasised that it is highly likely that strategic allocation will not deliver the number of homes that it was intended to as per the allocation in the adopted Local Plan for the reasons mentioned in the previous representations.</p> <p>Therefore, there is likely to be a shortfall in West Berkshire's housing land supply and the Council should be looking to allocate more sustainable sites for residential development to 'bridge' the gap and provide the homes the district needs.</p> <p><i>For appendix 1 see attachment.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Gallagher, Terence (Represented by Bluestone Planning)
<p>Consultee Full Name</p>	Mr & Mrs Terence Gallagher
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	Jeremy Flawn
<p>Agent Organisation</p>	Bluestone Planning
<p>Comment ID</p>	PS369
<p>Chapter / Policy / Appendix Number</p>	Policy SP 1
<p>Chapter / Policy / Appendix Title</p>	Spatial Strategy

Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 09:27:00
Attached Files	Jeremy Flawn (Mr and Mrs Gallagher) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>Extract of full response relevant to consultation point.</i> The spatial strategy enshrined in draft policy SP1 (Spatial Strategy) is strongly supported. The draft policy sets out three main objectives for the district over the plan period; <ol style="list-style-type: none"> 1 Directs development to areas of lower environmental value; 2 Optimises the use of previously developed land; and 3 Optimises the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment The policy goes on to state that this development approach will be based on three main spatial areas comprising of Newbury and Thatcham, Eastern Area, North Wessex Downs AONB.

	<p>It then states that that the focus of the development within each spatial area will be required to follow the district wide settlement hierarchy as set out in Policy SP3 (more below). Further, development and redevelopment within settlement boundaries as identified in Appendix 2 (the settlement boundary review), will be supported. Outside of the settlement boundaries, land will be treated as open countryside where development will be more restricted as set out in Policy DM1 and DM35.</p> <p>Within the 'North Wessex Downs Area' the policy strategy states that the AONB will have appropriate and sustainable growth which conserves and enhances its special landscape qualities.</p> <p><i>For full response see attachment</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	To discuss the merits of the settlement boundary matters.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS589
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	27/02/2023 12:16:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<p>1. An increase in houses by 25% with the aim of fitting them into a very small area of the county, mainly Theale and Thatcham, is not acceptable. The main reasons being extra demand on services already at breaking point or fully subscribed such as GP surgeries, hospitals, schools, dentists etc, additional traffic and air pollution adding to that of the M4 and the A32, and lack of public transport.</p> <p>2. There is already a 57.3% increase in housing approved which is very high. WBC need to consider planning applications that have been approved and ensure they are contained within the plan.</p> <p>3. There is major concern that the Plan will seriously compromise local medical provision, particularly hospitals and GP surgery facilities. The Plan needs to state these concerns and address the issues.</p> <p>4. There is major concern that the Plan will seriously increase traffic, pollution and does not accommodate much needed public transport, especially to rural villages such as Theale. Solutions need to be considered.</p> <p>5. 'Desk based' statements are not adequate/appropriate and a survey should be carried out.</p> <p>4. Policy SP1 - "Within other defined settlements developments are expected to secure a net density of at least 30 dwellings per hectare with higher densities achievable in the centres of Hungerford, Pangbourne and Theale." We object to Theale being included here as it is a rural village.</p> <p>5. Policy SP1. Including current planning applications, Theale has a 57.3% increase in development which is extremely high and has huge effects on the character of the village. The large Lakeside Development is not included in the Plan and needs to be added. The approved development figures for Theale need to be inclusive and accurate so need revisiting and correcting.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Kimberley Parry
Agent Organisation	Neame Sutton Ltd
Comment ID	PS631
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Policy SP1 (Spatial Strategy) states that the overarching spatial strategy for West Berkshire will deliver the spatial vision and strategic objectives for the district over the Plan period. The strategy:</p> <ul style="list-style-type: none"> • Directs development to areas of lower environmental value. • Optimises the use of previously developed land. • Optimises the density of development. <p>The development approach will be focused on three spatial areas:</p> <ul style="list-style-type: none"> • Newbury and Thatcham • Eastern Area • North Wessex Downs AONB <p>Given the clear need to increase the housing requirement, the Council's strategy fails to take advantage of the opportunity presented by Rural Service Centres, such as Hungerford, which are, by definition, larger rural settlements that are capable of accommodating growth, providing the opportunity to deliver sites early on in the Plan period.</p> <p>Hungerford benefits from a good range of key services and opportunities for employment, community, and education. It is accessible and has regular public transport services to a range of destinations.</p> <p>Directing further housing to locations, such as Hungerford, would enable the Submission Plan to cater for the needs of the community and assist in insulating the Council against housing delivery problems arising from the chosen strategy of focusing on a single large-scale development location.</p> <p>Donnington New Homes considers that this policy should be revised to account for the opportunities presented for housing delivery in the Rural Service Centres, particularly Hungerford.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No

Please give reasons for your answer	
4. Proposed Changes	The primary amendments necessary for the Submission Plan to be found found and to meet the Legal Compliance tests are summarised as: <ul style="list-style-type: none"> Reconsider the Spatial Strategy to direct more housing to settlements, such as Hungerford, to ensure a better distribution of development, more reflective of the needs of the community.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS700
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park West (SPW)</p> <p>On behalf of our Client, Donnington New Homes, I write in response to the Council's current consultation on the emerging West Berkshire Local Plan Review 2022-2039 (hereafter 'the Plan'). As you will be aware from past submissions, my client controls the western portion of Sandleford Park (known as Sandleford Park West) allocated by the existing West Berkshire Core Strategy Policy CS3. That Policy allocates approximately 134ha of land to provide a strategic housing development. Donnington New Homes has consistently promoted the land for over 10 years, demonstrating my client's ongoing commitment to its delivery. In 2018, my client submitted a planning application (ref. 18/00828/OUTMAJ) for the development of land within its control that was to be considered jointly with a corresponding application submitted by Bloor Homes and the Sandleford Farm Partnership (SFP), on the balance of the site. Since that time, Bloor Homes and SFP have obtained planning permission on the land within their control (in May 2022), following appeal and Secretary of State 'Call In' which demonstrates the acceptability of development on the site at the highest level. This submission, in response to the Plan, represents my client's continued commitment to deliver the element of Sandleford Park within its control as a sustainable, strategic housing allocation within the proposed submission Plan. My client supports the continued allocation of Sandleford Park within the Plan, together with the policies which secure land for that purpose and wishes to comment as follows:</p> <p>The overarching principles of distribution of development, as set out within Policies SP1 and SP3 of the Plan, are supported. Those being that Newbury will, as the most sustainable settlement in the District, continue to be the focus for new development. My client welcomes the clarification within Policy SP1 – Spatial Strategy stating that Sandleford Park is 'an urban extension' as opposed to a 'new urban extension' as it was referred to in the Regulation 18 Plan. As set out above, the site has been allocated for in excess of 10 years and part now has planning permission, so to make reference to the site as a 'new' site was previously incorrect.</p> <p>To emphasise the importance of Newbury as the continued focus for new development, the commentary within the Plan relating to the extensive area covered by rural parishes and AONB (74%) is welcomed. The continued protection of the AONB will be, to an extent, reliant on the delivery of the majority of new development within and around Newbury and Thatcham. My client's site at Sandleford Park West will make a valuable contribution to that delivery.</p>

	<Representation is part of a wider response for <u>Sandleford Park West</u> which can be found at relevant consultation points.>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holybrook Parish Council
Consultee Full Name	Pamela Kirkpatrick
Consultee Organisation	Holybrook Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS621
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 11:01:33
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>This proposed 'expected' minimum density based on the net space is too high for Holybrook and, for suburban areas, may not be the most effective way of calculating the required densities. This is of great concern, especially for development close to and feeding into the A4 Bath Road not only from Junction 12 of the M4 but also from Tilehurst and Burghfield. The Government's document Effective use of Land states: 'dwellings per hectare, used in isolation, can encourage particular building forms over others, in ways that may not fully address the range of local housing needs...it is therefore important to consider how housing needs, local character and appropriate building forms relate to the density measures being used'.</p> <p>The Local Plan has not considered the other options for the calculation of density which include habitable rooms or quantity of floor area. There is also the option to view sites in terms of their gross area which would include major distributor roads, primary schools, churches, shopping areas, open spaces and significant buffer areas required for landscape, ecological or infrastructure such as underground pipes. Again, this has not been considered. This policy is, like that for Spatial Areas, shows a broad-brush approach which fails to fully appreciate the requirements of each area and their infrastructure constraints.</p> <p>The Local Plan encourages more development in an area where traffic levels are dangerously close to saturation and infrastructure simply has not kept pace. The local plan should do more to protect these urban/suburban areas from over development and complete collapse through lack of sufficient infrastructure.</p> <p>HPC and its residents have made many unheeded representations to West Berkshire Council in respect of high-density development, traffic and infrastructure impact. Our residents face a regular battle with these ever-increasing issues.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>

Please give reasons for your answer	Previous comments made on this by the Parish Council have not been addressed.
4. Proposed Changes	All density tests should be included in the plan. The Parish Council proposed that no minimum density be applied and, instead, each application is considered on its own merit with each applicant's Design and Access Statement clearly explaining the rationale of the design and layout to justify the proposed density with reference to the accessibility to local services, the impact on infrastructure and local character, and sufficient parking provision.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS664
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework.</p> <p>There appears to be conflict within the Spatial Strategy and Policy DM1.</p> <p>Policy SP1 sets out that in each spatial area, opportunities should be taken to make the best use of previously developed land. It also confirms that settlement boundaries should ensure that villages surrounding Newbury and Thatcham maintain physical separation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Limes Leisure Investments (Represented by Knight Frank)
Consultee Full Name	Limes Leisure Investments
Consultee Organisation	Limes Leisure Investments LLP
Agent Full Name	Emily Brosnan
Agent Organisation	Knight Frank
Comment ID	PS598
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:41:42
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Under Policy SP1, we support the spatial strategy which “optimises the use of previously developed land”. By adopting this approach, the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land (previously developed land).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stratfield Mortimer Parish Council
Consultee Full Name	Lynn Hannawin
Consultee Organisation	Stratfield Mortimer Parish Council
Agent Full Name	Lynn

	Hannawin
Agent Organisation	
Comment ID	PS583
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	The strategy is in general sound but many aspects are described as West Berkshire will support or encourage, but no indication is given of how they will be funded.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Network Rail
Consultee Full Name	Ms Lisa Bullock
Consultee Organisation	Network Rail
Agent Full Name	
Agent Organisation	
Comment ID	PS1101
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p><i>c) Comments on other LPR Draft Policies (SP1, SP5, SP23, DM42 and supporting text)</i></p> <p>In non-site-specific terms the LPR policies in respect of spatial strategy, climate change and transport considerations also raise concerns in the context of the tests of soundness. The spatial strategy, climate change policy and transport policy should equally be consistent with National Policy requirements with regard to supporting and promoting sustainable transport.</p> <p>Across the LPR there are concerns that opportunities for policies to support sustainable development and specifically to encourage modal shift (to ensure the plan is positively prepared and consistent with national policy) have not been included. This again raises issues of soundness.</p> <p>The LPR as currently drafted is not consistent with NPPF requirements in terms of meeting the challenge of climate change (paragraphs 152-154). Neither is it consistent with wider national policy</p> <p><i>d) Consideration of Tests of Soundness</i></p> <p>By reference to Response Form Question 2, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:</p> <p>- The Plan is not positively prepared – it does not respond to identified need and it does not facilitate sustainable development.</p> <p>- The Plan is not justified – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the</p>

	<p>need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.</p> <p>- The Plan is not Consistent with National Policy – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>e) Changes required to make the West Berkshire Proposed Submission (Reg 19) Local Plan Sound</i></p> <p>By reference to Response Form Question 4 changes are identified as being required to make the West Berkshire Proposed Submission Local Plan sound. Specifically, the changes are required to ensure the plan is positively prepared, justified, and consistent with National Policy.</p> <p>To address the concerns raised with regard to soundness and specifically the failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes are sought in the context of spatial strategy, climate change and transport policies. Additionally, in site specific terms express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan 'sound' are as follows: (Changes required shown in red underlined/struck through). It is confirmed that the schedule of required changes has been jointly drafted and agreed between NR, Beftonforth and the Englefield Estate.</p> <p>Schedule of Required Changes (a) Policy SP1, Spatial Strategy (Page 17, third para)</p> <p>“Demand for travel will be managed, and accessibility to sustainable transport opportunities increased through improving choice for transport modes. <u>Opportunities to increase and expand provision of the movement of freight by sustainable means will be supported.</u> Existing community infrastructure will be protected and where appropriate enhanced. Infrastructure requirements will be set out in the Infrastructure Delivery Plan (IDP)”</p> <p>Early discussion with West Berkshire Council with regard to the representations made and suggested changes would be welcomed.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1209
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

Our client has an agreement with the landowners of the site, known as 'Land to the rear of The Hollies' in the District, which currently forms part of an allocated site for approximately 60 dwellings under Policy HSA16 in the adopted Housing Site Allocations Development Plan Document (HSADPD) (May 2017).

It is understood the 'emerging draft' Local Plan Review (LPR) no longer seeks to carry this allocation forward. This is despite part of the allocated site having already been built out and now occupied by residents. The Council say this is because the site now falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. The DEPZ was extended as a result of the updated Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019.

Our client does not support the removal of this allocated site from the Development Plan. Our client is keen to work collaboratively with the Council to secure the development of the remaining part of this currently allocated site. These representations therefore focus on responding to the removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield.

These representations also seek to respond to the Council's development strategy (including Policies SP1 and SP3, SP12 and SP14) and decision-making in relation to an effective 'moratorium' on new development within Burghfield Common, despite the village remaining as a 'Rural Service Settlement', which offers 'development potential appropriate to the character and function of the settlement', according to the proposed Spatial Strategy.

These representations also discuss Policy RSA12, which seeks the provision of approximately 100 dwellings within Burghfield Common1, within the extended DEPZ.

In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021) paragraph 35. This identifies that a sound Plan is:

- 1 a) **Positively Prepared**– 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development';
- b) **Justified**– 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence';
- c) **Effective** – 'deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground'; and
- d) **Consistent with National Policy** – 'enabling the delivery of sustainable development in accordance with the policies in this Framework'.

It is in light of these criteria that the LPR (Regulation 19) version has been considered. We find the de-allocation of site HSA16 is not consistent with the Council's approach to its development strategy and the settlement hierarchy. In addition, its approach towards a 'moratorium' on further development within the parish of Burghfield Common is flawed.

In relation to Policy SP1, the spatial strategy seeks to focus development within settlement boundaries, to optimise the use of previously developed land and make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment. We agree with this strategy in the context of the continued allocation of land to the rear of The Hollies.

Conclusion

These representations have been prepared by Pro Vision on behalf of our client, T A Fisher & Sons, in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039 (Regulation 19) (January 2023).

Our client has an agreement with the landowners of the site known as 'Land to the rear of The Hollies' in the District, which currently forms part of allocated site 'HSA16', in the adopted HSADPD (May 2017).

We note the allocation for the site is no longer included within the 'emerging draft' LPR, as the site falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield, despite there being a remainder of 32 units still to be delivered.

Our client **does not** support the removal of this allocated site from the LPR.

These representations have therefore focused on responding to the unjustified removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield as well as the development strategy and spatial hierarchy proposed by the LPR.

In particular, we consider the remaining number of dwellings should be carried forwards in the LPR as the development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the removal of the allocated site known as 'Land to the rear of The Hollies, Burghfield Common' and the inconsistencies in the spatial strategy, particularly towards development within the DEPZ, are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Vilna Walsh
Agent Organisation	Firstplan
Comment ID	PS765
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:46:00
Attached Files	Firstplan (Englefield Estate) Full Rep.pdf Firstplan (Englefield Estate) Appendix 1.pdf Firstplan (Englefield Estate) Appendix 5.pdf Firstplan (Englefield Estate) Appendix 2.pdf Firstplan (Englefield Estate) Appendix 3.pdf Firstplan (Englefield Estate) Appendix 4.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>No comment</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>For Full Representation see attachment</i></p> <p><i>By reference to Response Form Question 2, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:</i></p> <p><i>The Plan is not positively prepared – it does not respond to identified need and it does not facilitate sustainable development.</i></p> <p><i>The Plan is not justified – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.</i></p> <p><i>The Plan is not Consistent with National Policy – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); and considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site</i></p>

	<i>under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	No comment
4. Proposed Changes	<Proposed Changes shows as underlined for additions and strikethrough for deletions> Policy SP1, Spatial Strategy (Page 17, third para) “Demand for travel will be managed, and accessibility to sustainable transport opportunities increased through improving choice for transport modes. <u>Opportunities to increase and expand provision of the movement of freight by sustainable means will be supported.</u> Existing community infrastructure will be protected and where appropriate enhanced. Infrastructure requirements will be set out in the Infrastructure Delivery Plan (IDP)”
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>Response made raises significant issues with regard to the soundness of the plan if the proposed amendments are not made.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS779
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00

Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf PS779 Paula Saunderson - Newbury Area Plan.pdf PS779 Paula Saunderson – Chichester Local Plan Summary Information.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>THE SPATIAL AREAS</p> <p>I am concentrating on the Newbury Area which should be considered as a Sub Area within the Spatial Strategy known as Newbury & Thatcham Area, and the Map of the Settlement Boundary for the Newbury Area is below. We need Policy for Newbury Settlement such as a refreshed ADPP2 Pg 25-27 of the Local plan 2006-2026.</p> <p>https://www.westberks.gov.uk/media/36374/Core-Strategy-Final/pdf/Core_Strategy_-_Final.pdf?m=638047964894800000</p> <p><i>[See attachment 'PS779 Paula Saunderson – Newbury Area Plan' for diagram]</i></p> <p>https://www.westberks.gov.uk/media/53788/Local-Plan-Review-Policies-Map/pdf/Local_Plan_Review_Policies_Map.pdf?m=638095646380970000</p>

POLICY SP1 – THE SPATIAL STRATEGY

With old Policies such as ADPP2 for Newbury disappearing and as Newbury does not have its own SP Policy in this new Plan it is impossible to establish how many of the proposed 9000 residential dwellings/households and 50,816sqm of Office Space Employment or 91,109sqm of Industrial Space will be within the Newbury Area as a sub-set of the Newbury & Thatcham Spatial Area.

ADPP2 should not be made redundant- an updated version should be included.

There is far too much windfall development in the Newbury Sub-area which has been outside of Development Plan Documents and has been subject to Policies which were not necessarily very specific or leading edge. The Scale of Development in terms of Density, Height, Design, and Sustainability are important in what was an Old Market Town as it transforms into what may appear to be a Mini City. Design Codes are not clear and the rush to get through a Conservation Area Appraisal for Newbury without involving local expert Societies is an example of the lack of Duty to Co-operate.

To me having a Spatial Sub Area with Policy for Newbury is important as I already live in a densely populated area near the major road networks and very close a plan to the planned Redevelopment of WBC owned lands on the London Road Industrial Estate – the old NEW 1 LRIE Area which has mysteriously escaped being given a Site Allocation under either SP13 pg 55 or SP20 pg 73.

A comprehensive Development Plan led Policy Framework should be put in place for Newbury Settlement especially as several key Housing, Mixed and Employment Sites within the Sub Area are entirely missing from this Plan.

Lack of Clarity for Newbury Sub Area Sites

Sites seem to be coming in and out of scope via not clearly defined reasons or criteria and there is no clear table such as this example below for Newbury Sub Area. The example comes from the Chichester Section 19 Consultation currently underway which is much easier for residents to understand than the West Berks Consultation.

Newbury needs its own SP as it is a separate Community from Thatcham and should have the Green Gap between the 2 settlements clearly defined and protected as a Green Gap. That Statement is needed in an SP for Newbury.

It would be easier to understand if we had an **SA** Policy or a SPATIAL STRATEGY identifying the 3 SPATIAL AREAS then Major Settlements could EACH have Individual SP as is the norm under many other Local Plans such as Chichester, Cheshire East, Eastleigh (which groups related Wards), Lancaster, all of which have individual Policies for major areas within a Spatial Area.

CASE STUDY - E.g., Chichester is currently consulting on its Section 19 Proposed Submission and it has much clearer Summary Information shown in total and by Sub Areas. It also has clear Policy for Sub Sub Areas such as Chichester City, Chichester East & West

<https://chichester.oc2.uk/document/45/311#topofdoc>

[See attachment 'PS779 Paula Saunderson – Chichester Local Plan Summary Information' for diagram]

Newbury Town Council (NTC) have been given an explanation that Residential Site Allocations (RSA) & Employment Site Allocations (ESA) will not be made for several parcels of land as they are deemed to be within the Settlement Boundaries, however as several of the RSA Site Allocations ARE in the Newbury Settlement Boundary then this as a reason is illogical and invalid.

e.g.

- RSA3- Coley Farm is in the Settlement Boundary shown on the Map, it is in Newbury Clayhill Ward, work has started on site.
- RSA1- North of Newbury College appears to be in the Settlement Boundary
- RSA2 – Bath Rd Speen looks to now be in the Boundary?
- Sims Metal Yard (Old Passey Yard) has outline planning but is not yet started so why is it not in the Plan when Coley Farm is in the Plan and it has already started?
- Lambourn Site Allocation is in the Settlement Boundary

The **Map of Brownfield Sites** has disappeared, and the London Road **Industrial** Estate has been withdrawn. We are now left with a Spreadsheet with individual entries and no overall picture.

I cannot find the **Map of Dedicated Employment Areas (DEA)** and they are not listed in **DM32**? I can see the old PEAs on WBC GIS, but it is not possible to make a comparison of Old to New boundaries.

Within this Submission I may now diverge from the Structure of the Submission Document as we are missing a Strategic Policy for Newbury and the contents which relate to Newbury Settlement are now spread amongst other Chapters in the LPR.

>Comments on 'Retail and Commercial Areas within Newbury Settlement Area' can be found under the relevant consultation point<

Newbury NDP

The Newbury Neighbourhood Development Plan (NDP) is in its infancy and could take years to develop if it ever comes to fruition, and we have been advised it will NOT include Development Sites of any description??

As the Major Town and the Settlement earmarked for Maximum growth by the Unitary Council It is doubtful that a Newbury NDP would be allowed to truly reflect the wishes of its Residents.

Soundness

This means all the missing sites identified in this Document will not have the benefit of coming before a Planning Inspector. This position, in my view, makes the LPR 2022-2039 **Unsound** in respect of the Newbury Settlement.

	<p>The missing Sites mean it has not been Positively Prepared, It is Not Justified in terms of Households vs Infrastructure vs Employment as this is not adequately explained for this Settlement. As it is without the missing Sites which are required to make it work it will also Not Be Effective.</p> <p><i>Comments from representation form:</i></p> <p>None of the Key Mixed Sites for Newbury are included such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, and without these Key Sites and any specific Policy around them.</p> <p>The Plan omits Key Brownfield Sites for Newbury which has favoured the Sandleford Greenfield site. It omits one Key Employment Site for Newbury.</p> <p>Without a Newbury Settlement Sub Area SP Policy there is no clearly articulated Map or Data for this important Major Town.</p> <p>Without clear Maps & Data & Lists for Newbury of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.</p> <p>Therefore, I conclude the Plan is Not Sound for Newbury Settlement and:</p> <ul style="list-style-type: none"> • Is Not Positively Prepared • Is Not Justified • Is Not Effective for the next 20 years, and this Plan as it stands will Not Achieve the Visions <p>My document highlights many examples.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>In Terms of Newbury Settlement it needs to include the following Key Items for the Major Town.</i></p> <p>Include Key Mixed Sites for Newbury such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, Old Magistrates Court and without these Key Sites and any specific Policy around them.</p> <p>Include Brownfield Sites for Newbury to balance against the favoured the Sandleford Greenfield site.</p> <p>Include the missing Key Employment Sites for Newbury.</p> <p>Include a Newbury Settlement Sub Area SP Policy with a clearly articulated Map or Data for this important Major Town.</p> <p>Include Maps & Data & Lists for Newbury of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Marriage (Represented by ET Planning)</p>

Consultee Full Name	Messrs Marriage
Consultee Organisation	
Agent Full Name	Robyn Milliner
Agent Organisation	ET Planning
Comment ID	PS401
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:54:00
Attached Files	PS400/PS401 ET Planning obo Messers. Marriage Attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<i>Extract of full response relevant to consultation point.</i> The Site falls within the spatial area of Newbury and Thatcham as per draft Policy SP1. We are supportive of the spatial strategy and identification of three spatial areas, including Newbury and Thatcham as one of these. For Newbury and Thatcham specifically, the policy requires that among other requirements 'A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure in accordance with Policy SP17.' We are particularly supportive of the policy recognition for the need to green infrastructure specifically for Policy SP17 (North East Thatcham Strategic Site). <i>For full response see attachment.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>To represent my clients' best interests and explain the merits of the site and why it should be included within the site boundary</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Morgan, Paul
Consultee Full Name	Paul Morgan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1229
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	It would appear that the current ADPP areas :ADPP1 Spatial strategy; ADPP2 Newbury; ADPP3 Thatcham; ADPP4 Eastern SP1 Spatial strategy - Area; ADPP5 AONB; ADPP6 East Kennet Valley, will be replaced by three SP1 areas: Newbury and Thatcham; Eastern Area North Wessex Downs AONB. What is the rationale behind this? why are Newbury and Thatcham now lumped together, where are the SP1 plans for Newbury and Thatcham etc. How will this fit in with Neighbourhood Plans (NP) and how will NPs be incorporated?
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>The Local plan as it currently stands is, in my opinion, a poorly presented document and does not provide up to date evidence or sufficient detail to provide a sound basis for a local plan that will be in place until 2039. It appears rushed and ill considered in many areas. The public really should have had the opportunity to question and clarify directly with the authors at a "Town Hall" type presentation / exhibition / seminar.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Feltham Properties (Represented by Pro Vision)
Consultee Full Name	Sean Bates
Consultee Organisation	Feltham Properties
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS748
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:05:52
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? -	No

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>We have concern that as drafted Policy SP1 (Spatial Strategy) of the Local Plan Review (LPR) has some inconsistency in relation to density of development. As such, it is not justified when considered against the tests of soundness (NPPF, 2021:paragraph 35).</p> <p>The stated density ranges are not consistent with the West Berkshire Pattern Book (2019) (Chapter 2: Density by Location). That document is referenced at paragraph 4.35 of the supporting text as a "starting point to guide development". The Pattern Book has been used to guide the density of development on the allocated sites (LPR paragraph 8.3).</p> <p>The policy is not consistent with the starting point, which is therefore, liable to lead to uncertainty in decision making and frustrate efforts to deliver sustainable development.</p> <p>The policy is generally consistent with the Pattern Book in the fact that it requires "at least 70 dwellings per hectare" (dph) in more accessible locations in the settlement hierarchy's top tier settlements (the Pattern book indicates a range of 70 to 90 dph).</p> <p>However, the policy is inconsistent when it addresses edge of settlement locations in at least two respects:</p> <ul style="list-style-type: none"> • It treats edge of settlement the same for all defined settlements, whereas it starts by defining densities between top tier settlements and other settlements. • It is not consistent with the Pattern Book, which notes that higher densities are, in principle, appropriate along transport corridors, even to the edge of settlements. The policy requirement for 30 dph on the edge of defined settlements therefore overlooks the possibility of higher density development away from the town centres and closer to the settlement edge. There are many examples already of higher density developments on the edge of Newbury, for example.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Policy SP1 should be modified to be consistent with the Pattern Book, including in respect of clarifying that higher density can in principle be appropriate on the edge of defined settlements, including some flatted development, especially for higher tier settlements and along the main transport corridors and nodes.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To explain why the approach to density is inconsistent and inappropriate as drafted.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	No
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	No
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	No
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1737
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>3. Regulation 19 Proposed Submission document representations</p> <p>3.1 We generally support the draft Local Plan and the proposed strategy for the Plan period, including the spatial approach to development and its approach to housing numbers. However, we have some concerns about the lack of flexibility in the Plan, the failure of the Plan to allocate sites in accordance with its identified spatial framework, and inadequacies / inaccuracies in its evidence base in relation to our client's site.</p> <p>3.2 We are particularly mindful that Councils are required to maintain a rolling five-year supply of housing land, and consider that this may be a challenge for the Council due to the sites it has selected for allocation. The deliverability of these identified allocated sites are key to ensuring sites are coming forward as anticipated in the Plan.</p> <p>3.3 There is currently a continued reliance on sites that have not yet delivered and are therefore retained allocations from the current Core Strategy and Site Allocations DPD; or large strategic sites where delivery is likely to be slow.</p> <p>3.4 There are alternative available and deliverable sites immediately adjacent to Newbury that should be considered in the selection of proposed residential allocations in order to meet the identified housing need in the short to medium term.</p> <p>3.4 There are alternative available and deliverable sites immediately adjacent to Newbury that should be considered in the selection of proposed residential allocations in order to meet the identified housing need in the short to medium term.</p> <p>3.5 The merits of the Site at Long Lane, Newbury are considered later in these representations.</p> <p>Local Plan Strategy</p>

3.6 Policy SP1 'Spatial Strategy' sets out three spatial areas within the district where development will be focussed. Within these areas, development will follow the settlement hierarchy set out in Policy SP3.

3.7 The Spatial Strategy recognises that the allocation of greenfield sites is required alongside brownfield development in order to maintain a five year supply of housing land.

3.8 Newbury is identified as the largest settlement in the district and is one of the two main focus areas for development in the draft Plan (identified as 'Urban Areas' in Policy SP3). This is acknowledged to contribute to the regeneration of the towns in the District as well as the rural areas they serve. It should therefore be the principle location for identifying development sites.

3.9 The Council's housing supply position as of 31st March 2022 takes into account the Core Strategy Sandford Park Strategic Site amongst other sites allocated in the current Plan period, some of which are not being taken forward as proposed allocations as they are at an advanced stage of construction, and existing planning commitments on unallocated sites.

3.10 These 'commitments' total 7,337 dwellings. The annual requirement of 538 new dwellings results in an additional need of 1,809 dwellings. It is acknowledged that the 538 dwellings are not a ceiling nor a cap. There is no specific housing need identified for Newbury within the housing figures. The accompanying report by Pegasus (dated 19th January 2023) looks at matters relating to Housing Needs and Supply in more detail.

Sustainability Appraisal

3.11 The Sustainability Appraisal / Strategic Environmental Assessment ('SA/SEA') for the Spatial Strategy Policy SP1 states the continued focus on Newbury is not being taken forward. It states at Table 11 that

"This option gives a number of potentially positive sustainability effects in relation to focusing development on the biggest town with the largest number of facilities, with a significantly positive effect predicted due to the strategies' focus on the use of brownfield land. However, there are is an unknown impact as to whether the strategy would be able deliver adequate housing to meet the local identified need due to the lack of suitable sites within the area."(our emphasis)

3.12 Further, Table 12 subsequently states "The Policy is likely to have an overall positive impact on sustainability. The policy directs development to the most sustainable locations, therefore, giving positive impacts on all elements of sustainability. The policy is likely to have a number of positive knock-on effects on social and environmental sustainability as a result of focusing development on the most sustainable locations in the district."

3.13 The statement that "A reliance on focusing development in Newbury may not deliver the number of dwellings required to meet the local need" is boldly made but without justification, qualification or articulation. Although it may not be possible to direct all development to Newbury, it is apparent from the SA that there are available sites which could add to supply and restrict the need to allocate sites in more sensitive and less sustainable areas. The discounting of this positive SA scoring out of hand does not lead to good planning outcomes, and the plan consequently fails to reflect its evidence base and the SA/SEA outcomes.

3.14 We consider that the Council has failed to identify sufficient allocations at Newbury, contrary to its own spatial strategy and SA/SEA.

3.15 Conversely, in relation to Policy SP2 'North Wessex Downs AONB' the SA/SEA states "The Policy is likely to have an overall neutral impact on sustainability. There is likely to be a significantly positive impact on environmental sustainability as a result of the protection the policy offers to the AONB. There are also likely to be positive impacts on all elements of sustainability as the policy seeks to protect the AONB, and requires that any development supports the local community and the rural economy. There is a potentially known impact of social sustainability in relation to the provision of housing, as the policy does restrict major development in the AONB except in exceptional circumstances."

3.16 Yet the Council maintain a number of allocations in the most sensitive part of the District.

5. Comments on Development Management policies

5.1 **Policy SP1 'Spatial Strategy'** – we support this policy as it identifies Newbury as a focus for housing development.

6. Summary and Conclusions

	<p>6.1 These representations have been prepared by Turley on behalf of Donnington New Homes in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023).</p> <p>6.2 We reiterate that Newbury is the largest settlement in the District and is able to support residential growth to support the district's housing needs. The strategy set out in the Plan is supported, however the proposed site allocations are not varied enough to deliver the District's housing need in the short to medium term. There is an over-reliance on the two strategic sites coming forward, one of which (Sandleford Park) has been slower to come forward than anticipated in the previous plan period.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1149
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
<p>Submission Type * E-Mail * Letter * Other</p>	E-Mail

* SMS * Web * Unknown	
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>We support Policy S1 criteria b), which confirms that the Council's strategy for the plan period optimises the use of previously developed land. This is consistent with para 119 of the National Planning Policy Framework (NPPF), which promotes an effective use of land.</p> <p>Policy SP1 encourages proposals to strengthen and diversity the rural economy, particularly where they are located in or adjacent to Rural Service Centres and Service Villages identified in the settlement hierarchy. We consider that this is too prescriptive and goes against the aspirations of Section 6 (Building a Strong Economy) of the NPPF, which seeks to support a prosperous rural economy.</p> <p>At paragraph 84 the NPPF states: <i>Planning policies and decisions should enable:</i> a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings [...].</p> <p>At paragraph 85, the NPPF states:</p>

	<p><i>Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport'.</i></p> <p>The above NPPF paragraphs correctly recognise that businesses in rural areas should be supported including those 'beyond existing settlements'.</p> <p>As currently drafted, Policy SP1 expresses a preference for enterprises located in or adjacent to Rural Service Centres and Service Villages. In introducing this preference, there is a risk that those rural businesses which are not within or adjacent to settlements would not be supported. We note that no such preference is expressed within the NPPF and request that the Council accords with this approach.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>For the reasons discussed above, we request that Policy SP1 of the Draft Local Plan is amended to ensure consistency with National Policy as detailed below (additions shown <u>underlined</u> deletions shown with a strikethrough).</p> <p>[...]</p> <p>Proposals to strengthen and diversify the rural economy will be encouraged., particularly where they are located in or adjacent to Rural Service Centres and Service Villages identified in the settlement hierarchy. Existing small and medium sized enterprises within the countryside will be supported in order to provide local job opportunities and maintain the vitality of smaller rural settlements and their communities.</p> <p>[...]</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Jones, R.L.A (Represented by Carter Planning Ltd)
<p>Consultee Full Name</p>	Mr R.L.A. Jones
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	Mr Mark Carter
<p>Agent Organisation</p>	Carter Planning Limited
<p>Comment ID</p>	PS1171
<p>Chapter / Policy / Appendix Number</p>	Policy SP 1

Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Whilst much of Policy SP 1 is unobjectionable, and can be supported, objection is raised to the mechanisms for the allocation of housing in Lambourn.</p> <p>We are pleased to see that the very last sentence of SP1 proposed in the Regulation 18 version has now been deleted.</p> <p><i>"Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through Neighbourhood Development Plans".</i></p>

	<p>That was an abrogation of the function of this Draft Plan Review set in Policy. Neighbourhood Plans should not be making housing allocations, that is a function of the Draft Plan Review, and indeed some such sites, if suggested, may cut across the policies of the LPR.</p> <p>However the provisions for housing now are vague and do not give the certainty required from the Plan.</p> <p>The Draft LPR now states :-<i>“Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review LPR and in some neighbourhood plans, together with infill development, including that on windfall sites within settlement boundaries”.</i></p> <p>Indeed Paragraph 4.19 states that housing will “in part” be provided through Neighbourhood Plans. Currently there is no adopted Neighbourhood Plan for Lambourn. If the task of allocating housing sites is left to Neighbourhood Plans, especially in Lambourn, either that Plan may not come forward or, more likely, local residents will not want additional housing in their locality leaving the housing requirement unsatisfied.</p> <p>It is very unlikely that the statement in Paragraph 1.17 can be achieved namely that Neighbourhood Plans can promote more housing (but not less).</p> <p>Similarly there should not be any prohibition on sites adjoining the settlement boundary to allow for development contemplated by the NPPF. These sites will especially be required if proposed housing sites do not come forward.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	Please see other submissions on this specific point <See Rep: ID1170>
<p>4. Proposed Changes</p>	<p>The reliance on allocations through the Neighbourhood Plan process in Policy, albeit watered down from the Consultation Version, together with the prohibition on edge of settlement sites, raises questions as to whether the objectively assessed housing needs will be met within the Plan period increasing pressures on other areas and settlements to meet the unmet need.</p> <p>The Council should allocate all housing sites through this Draft LPR and not leave the task to Neighbourhood Plans. Amend the provisions of Policy SP1 accordingly.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	We do not consider the LPR is sound and would like to participate in the examination
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bloor Homes (Represented by White Peak Planning Ltd)
<p>Consultee Full Name</p>	Bloor Homes
<p>Consultee Organisation</p>	Bloor Homes
<p>Agent Full Name</p>	Rob White
<p>Agent Organisation</p>	White Peak Planning Ltd
<p>Comment ID</p>	PS1311

Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Object. The policy is not consistent with national policy, justified or effective.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>Proposed change: insertion of the following phrase, “Within Newbury ... and Calcot, developments are expected to secure a net density of at least 35 dwellings per hectare... <u>unless it has been demonstrated that site constraints necessitate a lower density of development.</u></p> <p>Paragraph 125 of the NPPF advocates the use of minimum density standards, where there is an existing or anticipated shortage of land for meeting identified housing needs. Paragraphs 127-136 provide guidance on the importance of good design to ensure that development is visually attractive, sympathetic to local character, and optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space). Given that there is not a shortage of land to meet housing needs and much of West Berkshire District is valuable countryside, some flexibility should be introduced into the policy wording to ensure that sustainable development can be provided in sustainable locations which sits well within the landscape and reflects the constraints of each individual development site. There needs to flexibility for density to be varied across a development site, particularly where it will be delivered in phases, to reflect site constraints.</p> <p>Blanket application of density requirements could also render the plan ineffective as it could prevent sustainable sites from being developed out due to protracted debate over application of the density policy.</p> <p>It is noted and supported that this caveat has been attached to the requirement for development on the edge of defined settlements to secure a net density of 30 dwellings per hectare.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Yes. To explain and provide examples of how the plan cannot be effectively delivered without flexibility over density requirements.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1364
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	02/03/2023 09:09:00
Attached Files	Pro Vision (T A Fisher) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Relationship with the Settlement Hierarchy</p> <p>Policy SP1 of the draft Local Plan confirms that the focus of development in the District's three spatial areas (footnote 5) "will follow the District-wide settlement hierarchy set out in policy SP3 which takes account of the function and sustainability of settlements and promotes sustainable communities." This is an appropriate strategy, focusing new development in the most sustainable parts of the District, as confirmed by the policy's supporting text (paragraph 4.21).</p> <p>In setting out the proposed settlement hierarchy for the District, Policy SP3 of the draft Local Plan builds upon the spatial strategy outlined in Policy SP1. Mortimer is identified as a Rural Service Centre, which is described as a larger rural settlement that offers "development potential appropriate to the character and function of the settlement". This includes "Non-strategic sites allocated for housing and economic development through other policies in the LPR or Neighbourhood Plans".</p>

Table 1 of the draft Local Plan sets out the function of the Rural Service Centres. It explains that they comprise “Settlements with a good range of key services and opportunities for employment, community and education. They serve a wide catchment area and contain reasonable accessibility and regular public transport provided to a number of destinations.”

Paragraph 4.33 confirms that “Development over the plan period will build upon the existing settlement pattern”, while paragraph 4.34 explains that “**the six rural service centres across the District provide a focal point for the surrounding villages and rural areas in terms of the provision of services and facilities. Although they do not have as wide a range of services as the urban areas, they are still sustainable locations (our emphasis).**”

Furthermore, paragraph 4.33 notes the following:

“The characteristics of the individual rural service centres and service villages vary, reflective of the diverse nature of West Berkshire. They are not intended to have the same amount of growth as each other; instead, the level of growth will depend on the role and function that they perform for the surrounding spatial area, and will be related to their location, size, range of facilities and services as well as the availability of suitable development opportunities. Their sustainability will be considered alongside other factors, particularly environmental constraints such as the AONB or the DEPZ around the AWE sites of Aldermaston and Burghfield.”

At the time of preparing the adopted Development Plan, Mortimer was considered a sustainable location for growth, as demonstrated by the allocation of 110 dwellings to the village. Considering this, the case for focusing new development in this location is even stronger now, given the level and range of existing facilities, services and infrastructure in the area, as well as those currently coming forward.

Rural Service Centres that have been allocated housing in the draft Local Plan include Hungerford (55 dwellings) and Lambourn (25 dwellings), which are in the same tier of the settlement hierarchy as Mortimer.

Mortimer is not subject to the constraints mentioned in paragraph 4.16 and 4.33 of the draft Local Plan as it is not in the AONB or the DEPZ around the AWE sites of Aldermaston and Burghfield.

Paragraph 4.15 of the draft Local Plan states that there is significant employment in the Eastern Area which adds further weight to growth in Mortimer which is not subject to the environmental constraints that some of the other settlements in the Eastern area are.

At present, the draft Local Plan, particularly Policy SP14, fails to recognise Mortimer as a Rural Service Centre (a sustainable location for growth) through its proposed housing allocations over the Plan-period up to 2039. In line with the adopted Development Plan, as well as the approach taken at other Rural Service Centres and Service Villages, the village should be allocated its own growth beyond that currently planned up to 2026.

As referred to earlier, paragraph 66 of the NPPF confirms that “**strategic policies should...set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations (our emphasis).**”

For the reasons explained above, the Council has failed to allocate housing to Designated Neighbourhood Areas “which reflects the overall strategy for the pattern and scale of development”. In particular, the Council has overlooked the additional potential at Stratfield Mortimer, while allocating new housing to other Rural Service Centres, alongside Service Villages. The draft Local Plan and its evidence base clearly confirm that the latter are less sustainable locations than Stratfield Mortimer, notwithstanding the sustainability of Mortimer compared with the former.

This approach conflicts with Policy SP3 of the draft Local Plan, which explains that “*The focus of development will follow the District-wide settlement hierarchy which takes account of the function and sustainability of settlements across the District and promotes sustainable communities.*”

While not directly comparable, some insight into this issue can be taken from the recently adopted South Oxfordshire Local Plan 2011-2034.

Of particular relevance, in relation to Market Towns, paragraph 185 of the Inspector’s Report (27 November 2020) raised the following concerns regarding draft Policy H3:

“...housing delivered or committed since the start of the plan period means that at this stage, with almost 15 years still to go until the end of the plan period, most of the requirement for Thame and Henley, and all of the requirement for Wallingford, has been met. Policy H3 is written in such a way that neighbourhood plans only need to cater for the relatively small residual amounts: 156 in Henley, 363 in Thame, and none in Wallingford. In practice this would be likely to prevent sustainable development from taking place over a considerable number of years which would impair the ability to meet demonstrable local housing needs that could arise during that period (our emphasis).”

Further to this, paragraph 186 sets out the Inspector’s recommendations to enable Policy H3 to be found sound:

“The market towns are sustainable towns with a reasonable range of facilities and should be expected to play a proportionate role in meeting the District’s housing needs. MM25 therefore expresses as minima the Policy H3 housing requirements for the market towns, including Wallingford, and deletes the references to residual requirements. It also indicates that neighbourhood development plans for the market towns should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in provision above the outstanding requirement. This additional flexibility would not result in excessive unplanned development because Policy H1 exerts control over sites not allocated in the development plan; nor would it threaten either the character of the AONBs or the historic character of the market towns, because Policy ENV1 contains strong protection for the AONBs and Policies ENV6 to ENV9 equally protect heritage assets (our emphasis).”

In relation to the Larger Villages, paragraph 4.17 of the adopted Local Plan notes that:

	<p><i>“The Local Plan proposes the provision of 15% growth in the larger villages. This level of growth has been calculated using the existing housing stock as it was at 2011 - the base date of the Local Plan and is on top of Core Strategy allocations where these exist.</i></p> <p><i>The larger villages have already collectively delivered 14% growth in housing based on completed dwellings between 1 April 2011 and 31 March 2020. The Plan is therefore planning positively for further growth over the remainder of the plan period. This will ensure that these places continue to grow and support the services and facilities that sustain them (our emphasis).”</i></p> <p>Furthermore, paragraph 4.30 of the Local Plan explains that:</p> <p><i>“Table 5f differentiates between villages where this Local Plan proposes allocations to either meet the village’s growth needs (due to them not preparing a Neighbourhood Development Plan) or where the Local Plan has proposed strategic allocations in Chapter 4. For villages where the Council is not making allocations in this Local Plan, the table identifies a housing requirement for them to be achieved either through Neighbourhood Development Plans or planning applications in accordance with Policy H4. The Council will support larger villages to allocate further development sites should the NDP so wish, where this level of growth is sustainable for that village, and where this is in accordance with national policies and guidance. These housing targets take into account the existing commitments and completions and identifies the following remaining levels of development to be delivered at each larger village (our emphasis).”</i></p> <p>In summary, the points outlined above demonstrate that simply because an area may have already achieved the level of housing originally planned – or has an existing allocation to deliver this quantum of housing – additional growth in sustainable locations should be supported throughout the whole Plan-period.</p> <p>This underlines the importance of supporting the delivery of new housing in the most sustainable locations, acknowledging the social, economic and environmental benefits that it can provide, including the role that it can play in maintaining the vitality and viability of existing settlements.</p> <p>Stratfield Mortimer is a sustainable location that is suitable for additional growth – as well as being capable of accommodating additional growth – which should be encouraged and reflected in an amendment to policy SP14.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincents Lane (Represented by TOWN)
Consultee Full Name	Pincents Lane

Consultee Organisation	Pincents Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1354
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincents Lane) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	No

* No	
Please give reasons for your answer	<p>Paragraph 11 of the NPPF 2021 requires (inter alia) that “all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area...”</p> <p>The spatial strategy for the District seeks to focus development on Newbury as the key market town and administrative centre; as well as Thatcham as a ‘focus for regeneration.’ However, as a result, the role of Reading as the key economic driver and centre of population in the sub-region and HMA is underplayed. The Local Plan’s current strategy will tend to exacerbate unsustainable patterns of travel with more people required to travel from Newbury and Thatcham to Reading in order to access employment or higher-level public or other services.</p> <p>It is acknowledged that much of WBC is protected from significant development by virtue of national or local planning designation – for instance 74% of the area falls within the North Wessex Downs AoNB. Similarly, constraints exist within the Eastern Area.</p> <p>However, whilst constraints exist with the Eastern Area, there is a both a need and a sustainable opportunity to identify more sites for development in the Eastern Area, particularly where sites exist that are demonstrated to have little or no practical obstacles to development. These would necessarily have to be free from constraints including flood risk and the Atomic Weapons Establishments (AWE) safeguarding zones of Aldermaston and Burghfield. Such a move would recognise the ‘close functional relationship’ with Reading noted in the Duty to Co-Operate statement quoted in section 3 above.</p> <p>With regard to SP1 and the Eastern Area we object to the removal of new allocations for housing development in this area and particularly at Tilehurst given the clear identification of suitable, available and developable land in this locale in the HELAA -TIL 13 which is not in the AONB. NPPF 11(a) makes clear plans should promote a sustainable pattern of development and meet the development needs of their area. The plan’s failures with regard to the Eastern Area are inconsistent with the NPPF.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	<p>The requirement to allocate more sites in the Eastern Area would address many of these challenges to soundness. Whilst it is acknowledged that some constraints do exist, there are sites which are recognised as achievable and deliverable in the Council’s evidence base supporting the LPR. Prime amongst these is site TIL13 at Pincent’s Lane (see overleaf). Site TIL13 has a long planning history. By common consent, the problems with the 2011 appeal scheme have been resolved and no technical obstacles exist to development of the site for a scheme of up to 165 dwellings. By the LPA’s own assessment, the concerns – and the reasons for not proposing it for allocation – are entirely “political”. No one would deny the validity of elected members making political choices where real choices exist, but the fact is that not allocating the site would leave the LPA without a single significant contribution to offer to meet either its own housing need in the Eastern Area or that arising from Reading, of which the Area is functionally part. The site should therefore be allocated.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1586
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 16:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>*Late Response*</p> <p>Page 17</p> <p>Combining The Eastern Area (Urban) and the East Kennet Valley (Rural) areas together into The Eastern Area, signifies a lack of vision or willingness to develop policies target for each type of area. Rather it indicates an underlying desire to the Eastern Area a target for further develop without due process being applied.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Wallis Trustees (Represented by Carter Jonas)
<p>Consultee Full Name</p>	Frank Wallis Estate Trustees
<p>Consultee Organisation</p>	Wallis Trustees
<p>Agent Full Name</p>	Steven Sensecall
<p>Agent Organisation</p>	Carter Jonas
<p>Comment ID</p>	PS1380
<p>Chapter / Policy / Appendix Number</p>	Policy SP 1
<p>Chapter / Policy / Appendix Title</p>	Spatial Strategy
<p>Order</p>	13
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>We continue to support the Council's spatial strategy and agree that the focus of development should be at the sustainable top tier Urban Areas of Newbury and Thatcham. The main urban areas of Newbury and Thatcham contain a wide range of services and opportunities for employment, community and education that serve a large catchment area with good levels of accessibility and frequent public transport provision. Regeneration and expansion of these settlements therefore accords with the Framework.</p> <p>Owing to Newbury and Thatcham's sustainability criteria, and that "<i>Newbury will be a focus for housing development</i>" and "<i>Thatcham will be a focus for regeneration</i>", it is therefore surprising that there are not more allocations proposed at Newbury and Thatcham. Currently, there is an over-reliance on two large strategic sites, (one of which has been carried forward from the Core Strategy (2012)) which will require at least the 17-year plan period and beyond to be delivered. Furthermore, it is noted that the smaller proposed residential allocations around Newbury and Thatcham have been carried forward from West Berkshire's Housing Site Allocations Development Plan Document (DPD) which was adopted in 2017, 6 years ago.</p>

	<p>Generally, of the 23 proposed residential allocations across the district, 14 (60%) have been brought forward from the Housing Site Allocations DPD of 2017 as they have yet to be delivered. Additionally, the housing trajectory suggests that despite the long-standing allocations, several of the carried forward sites are unlikely to start to provide homes until after 2027, such as sites RSA1, RSA8, RSA9, RSA14, RSA18, RSA21.</p> <p>Furthermore, of the proposed new residential allocations none of which are anticipated to provide a source of housing supply in the first five years of the plan, with the trajectory confirming housing delivery after 2027.</p> <p>This analysis suggests that additional sites need to be found to ensure that there is housing delivery in the early phases of the plan and to ensure that the plan is positively prepared.</p> <p>It is considered that there should be flexibility in relation to development outside but adjacent to settlement boundaries in sustainable locations at Urban Areas and that development in these locations should not be restricted and treated as open countryside. Sites adjacent to settlement boundaries at Urban Areas should be considered as a flexible opportunity for sustainable development to bolster historic allocations, such as Sandleford Park or Lynch Lane, Lambourn, which fail to deliver in a timely fashion.</p> <p>Whilst the Spatial Strategy Policy SP1 is generally supported, it is considered that several of the proposed residential allocations conflict with the policy in relation to “<i>optimising the density of development to make the best use of land</i>”. Whilst landscape impact is an important consideration for the design and density of a scheme, policy wording recommending low density development on proposed allocations at Theale and Chieveley (Policies RSA10, RSA11 and RSA17) are considered contrary to draft Policy SP1 as the density and ultimate capacity of a site should be determined during the course of planning application preparation and determination.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills

Comment ID	PS1771
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	It is noted that the overall proposed spatial strategy set out in draft LPR Policy SP1 generally reflects that of the adopted Core Strategy, with new residential and employment development predominantly focused towards Newbury and Thatcham (as referred to at paragraph 4.13). This overall approach is supported by the Council's Settlement Hierarchy Review Topic Paper (November 2020), which identifies Newbury and Thatcham as the most sustainable locations for development in the District and follows

the NPPF (paragraph 68) guidance which seeks to direct development to the most sustainable locations. It is however important to note that previous large allocations at Newbury and Thatcham (including the 2,000 home allocation at Sandleford Park) have been delayed in coming forward, as set out in the Annual Monitoring Report (AMR) 2022 (published January 2023), and that Newbury and Thatcham are subject to a number of constraints including heritage (including a Registered Battlefield south-west of Newbury), flood risk and a Nutrient Neutrality Zone north-west of Newbury. On this basis and given that the AONB covers 74% of the District, it is particularly important that an appropriate amount of development is also allowed for at sustainable locations in the Eastern Area in particular (e.g. Burghfield Common, Mortimer and Theale) to ensure that housing needs are met across the District and that the vitality of other settlements is maintained.

The Sustainability Appraisal (SA) states that, in considering the option for an 'increased focus on the Eastern Area' – 'This option is not considered to be a reasonable alternative due to the constraints relating to the DEPZ for AWE Burghfield and the long term nature of the Grazeley settlement proposal to meet the growth needs of Reading.' However, whilst the Eastern Area has constraints (e.g. DEPZ, flood risk etc.), these are subject to change and are dependent on the scale and type of development proposed, and are therefore not necessarily insurmountable constraints over the entirety of the Plan period. It is important to note that the DEPZ is reviewed every 3 years (as referred to at paragraph 4.16) and was recently subject to minor amendments made in January 2023. Furthermore, an Inspector recently allowed a residential development of 49 units within the DEPZ at Three Mile Cross (within Wokingham borough) (ref. 3304042), where he concluded based on detailed examination that there was a 'very small' risk of an incident and that 'there would be no harm with regard to the proximity of the AWE Burghfield site.' On this basis it is considered that a more positive and proactive approach should be taken to addressing these issues to accommodate sustainable development within the Eastern Area, in line with NPPF paragraph 121.

Policy SP1 itself states that, within the Eastern Area, Theale will be a focus for additional housing; however, provision for additional housing at Burghfield and Tilehurst through Neighbourhood Plans (as proposed in the previous Reg 18 consultation), including 175 units at Tilehurst has been deleted. This appears to be on the basis of the DEPZ designation relating to Burghfield and on the basis that Tilehurst Parish Council decided not to allocate any sites in the recent Neighbourhood Plan consultation undertaken, as referred to in the Housing Background Paper. The provision for 175 units at Tilehurst has not been redistributed elsewhere in the Eastern Area and so there is a reduction in the amount of development proposed in the Eastern Area compared to the previous Reg 18 consultation. The first part of draft Policy SP1 states that 'The focus of development in each spatial area will be required to follow the District-wide settlement hierarchy set out in Policy SP3' – which in the Eastern Urban Area includes the 3 Rural Service Centres of Theale, Burghfield Common and Mortimer. Taking into account the roles of Theale, Burghfield Common and Mortimer in the District (referred to further below) and the recent provision made for development within the DEPZ, greater provision should be made for additional housing at these settlements in the Eastern Area in order to ensure certainty of future housing supply. This approach will also provide flexibility for the Council to respond to changes in circumstance e.g. amendments to the DEPZ boundary.

Notably, draft LPR Policy SP1 also makes no reference to the potential for additional housing supply at Mortimer, one of the largest settlements in the Eastern Area. The village is however located just outside the DEPZ and is therefore a less constrained area that has the greater opportunity to accommodate development in the Eastern Area. Draft LPR Policy SP14 acknowledges the 110 units allocated in the Stratfield Mortimer Neighbourhood Plan, however this only covers the period to 2026 and therefore does not account for the LPR plan period to 2039. Paragraph 6.38, supporting Policy SP14, states that no additional dwellings are proposed based on incorrect reference to Mortimer being a 'Service Village' with 'some limited development potential'. Mortimer is however a 'Rural Service Centre' in the second tier of the Settlement Hierarchy alongside Burghfield Common and Theale as set out in draft Policy SP3. Given the sustainable and relatively unconstrained location, the LPR spatial strategy should therefore make additional provision for development at Mortimer.

Draft LPR Policy SP1 adds that the Eastern Area will 'continue to be important for business development with the retention of DEAs' (Designated Employment Areas). Whilst the importance of business development within the area is welcomed, it is considered that this reference should be broadened to not only refer to DEAs but also existing employment areas (within and adjacent to the District boundary) and the rural economy (as referred to elsewhere within Policy SP1) which also provide an important contribution to the local economy. In this regard it is welcomed that draft Policy SP1 has been updated to specifically state that 'Proposals to strengthen and diversify the rural economy will be encouraged...' and 'Existing small and medium sized enterprises within the countryside will be supported...'

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>On this basis, Policy SP1 as currently worded does not meet the tests of soundness set out in paragraph 35 of the NPPF. The following changes are therefore recommended in order to ensure the soundness of the Plan:</p> <p>"...Theale, <u>Burghfield Common and Mortimer</u> will be a focus for additional housing including through existing commitments and new allocations.</p>

	The area will continue to be important for business development with <u>through</u> the retention of DEAs <u>and</u> existing employment sites and through proposals to strengthen and diversify the rural economy ...”.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst Parish Council
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1663
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	Removal of the expectation of housing allocations through NDPs is to be welcomed.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1521
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf
1. Do you consider the Local Plan Review is legally compliant?	No
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>[See attached Combined Appendices for appendices. For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>The Spatial Strategy and Settlement Hierarchy (Draft Policies SP1 and SP3)</p> <p>West Berkshire is a highly constrained District. As set out at paragraph 4.6 of the LPR, it contains a number of physical and environmental constraints which influence the location of development including the North Wessex Downs AONB (which covers 74% of the District), substantial areas liable to flooding, the presence of the AWEs at Aldermaston and Burghfield, areas constrained by nutrient neutrality and various other heritage and environmental designations. These are well represented in visual form at Figure 1 of the LPR, which is extracted below at Figure 5.</p> <p>In response to this, the LPR's spatial strategy is set out at draft Policy SP1. One of its key aims is to direct development to areas of lower environmental value.</p> <p>It splits the District into three spatial areas: 'Newbury and Thatcham'; 'North Wessex Downs AONB'; and 'Eastern Area'.</p> <p>Newbury and Thatcham</p> <p>As set out by Croudace's representations at the Regulation 18 stage (Appendices E, F and G), the decision to direct growth towards Thatcham is strongly supported.</p> <p>Although Thatcham is one of the 'top tier' sustainable settlements in West Berkshire, it was only allocated very modest levels of growth in the adopted Core Strategy and HSA DPD. The Council justified this at the time on the basis that Thatcham had historically seen significant growth and was deemed to require a period of 'consolidation'. Again, the HSA DPD only contained a single allocation in Thatcham.</p> <p>When the Core Strategy was examined between November 2010 and May 2012, the Inspector accepted the 'consolidation' strategy for Thatcham, but recommended it should be reconsidered as an area for housing growth in any future review, acknowledging its position at the 'top tier' of the settlement hierarchy. An initial review was taken by the HSA DPD and so the LPR represents the second review since the Core Strategy's adoption in July 2012.</p> <p>Therefore, by continuing to designate Thatcham as a 'top tier' settlement and by directing growth to the 'Newbury and Thatcham' spatial area, the Council has taken this advice on board. Accordingly, Croudace supports Thatcham's status as a 'top tier' settlement (Urban Area) in draft Policy SP3.</p> <p>However, Croudace considers that the LPR has not gone far enough, and in order to propose a 'justified' strategy, considers directing additional levels of growth to Thatcham given its status in the hierarchy. This growth could be redistributed either through different allocations to meet the proposed housing requirement identified (538 dpa) or through additional allocations to meet an increased housing requirement which provides additional 'headroom' or uplift in flexibility (for example, takes into account Reading's existing and future needs that remain, or will be, unmet).</p> <p>Alternatively, Croudace considers that in order to provide greater flexibility to the LPR, the Council should explore an approach which allows development to come forward on sites outside, but immediately adjacent to the settlement boundary, subject to meeting certain criteria. Such an approach may be useful in instances where, for example, there is no 5YHLS and/or the Housing Delivery Test has been failed, or where delivery rates on sites in the housing trajectory drop below a certain level.</p> <p>In this regard, Croudace would like to highlight an example used by many local authorities, including Fareham Borough Council, where Policy DSP40 (Housing Allocations) and emerging Policy HP4 both support residential development on land outside the urban area where there is no 5YHLS. (Appendices H and I).</p> <p>In summary, Croudace lends its tentative support to some of the principles established by draft Policies SP1 and SP3. However, it cannot fully support these policies without a mechanism for bringing forward land at Henwick Park for development, whether that be an allocation or other favourable policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	Yes

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1819
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Paragraph 4.19 of the LPR states that Pangbourne has limited development opportunities, we disagree with this statement.</p> <p>Pangbourne does have development opportunities with sites such as those identified later on in this letter, which would go a long way towards providing well designed and appropriate development as natural extensions of the existing settlement, within acceptable distances from the centre of the village as defined in the settlement hierarchy topic paper.</p> <p>Pangbourne does not have a neighbourhood plan, and therefore, sites are unlikely to come forward through one in the early part of the new plan period.</p> <p>The plan fails to consider whether Pangbourne, as a rural service centre, can accommodate development outside of the existing settlement, in particular, to contribute to meeting the needs of specialised housing as set out in Policy DM19.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The plan should be amended to identify sites in and round Pangbourne, which is identified within the settlement hierarchy (SP3) and the second highest tier settlement with extensive services and facilities available.</p> <p>Allocating sites for specialist housing, in this instance older persons accommodation / retirement living, plays a key part in allowing family housing within villages to be made available on the open market, bringing new economically active adults into the area and assisting in sustaining local services and facilities. It also provides job opportunities for the local community and allows older people to stay in their communities with additional support.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1258
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The sections on “Context” (2.1) and the “Development Strategy: Overview” (4.6) need to make more of the very large constraints on all spatial development in West Berkshire. These are listed in 4.6 but nowhere in these sections does the natural conclusion appear: that there is a severe shortage of available land; I have seen a figure of 11% cited in other policy documents approved by Council. With the recent statement by DLUHC that this could be taken into account when deciding the number of new homes to provide, it should be explicitly stated whether or not the Council wishes to use this to argue for a lower number.</p> <p>This will be used in support of some of our other responses to policy in the draft Plan, which tend to call for a more flexible approach to well evidenced applications for development in the countryside – even in the AONB – and in flood zones.</p> <p>The policy doesn’t take sufficient advantage of broadband reducing the need to travel. This doesn’t just enable reduction of out-commuting from the District as a whole, but can also help sustain viable rural communities through improved access to services via remote means: from online shopping to primary healthcare online consulting and online education.</p> <p>The current pattern of middle income white collar workers and executives working from home in rural communities, while low income rural workers out-commute from social housing in urban areas doesn’t help maintain rural shops and schools. We believe the rural areas and AONB could sustainably accommodate significantly more new homes to meet the needs of rural businesses and communities.</p> <p>This will also be reflected in changes we propose to DM1 and in the reduction of numbers in SP17. We also think the spatial strategy does not make sufficient use of brownfield land, as set out in SP12.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>In 2.1, add a sentence to the end: “These facts alone indicate a severe constraint on all forms of development in the District.”</p> <p>In 4.6, add a sentence at the end: “It is estimated that only 11% of the District is either not already developed or is not subject to national policies that seriously limit the prospects for development and/or are areas where housing cannot be allocated in a Spatial Plan.”</p> <p>In the third paragraph of SP1 on page 17, after “improving choice in transport modes” add “and seeking to minimise the need to travel through broadband rollout”.</p> <p>At end of 4.19 add new sentence: “We will also encourage local communities and rural businesses to seek opportunities that may arise to accommodate small residential development in support of local needs in appropriate locations, thereby reducing in-commuting from towns and helping to sustain local facilities.”</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes

5. Independent Examination	We wish to explain our approach to rural development known as "Viable Villages".
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1805
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	PS1747 Boyer (Darcliffe Homes) Full LPR Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>THE SPATIAL DISTRIBUTION OF HOUSING</p> <p>The NPPF (2021) requires, at paragraph 20, strategic policies should set out an overall strategy for the pattern, scale, and design quality of places. Making sufficient provision for housing and other development needs. Darcliffe welcomes the Council's consideration of alternative options [Footnote 13: Available online at: https://www.westberks.gov.uk/lpr-proposed-submission-consultation] to develop an appropriate spatial strategy for West Berkshire up to 2039, as detailed within the Sustainability Appraisal that accompanies this iteration of the emerging local plan (SA).</p> <p>The identified alternative spatial strategy options for the District each seek to direct development toward the most sustainable settlement locations within West Berkshire. Darcliffe supports the Council's recognised commitment to maximising development at the most sustainable locations in the District.</p> <p>However, notwithstanding the direction of development toward the most sustainable settlements, each reasonable alternative spatial strategy option ultimately relies upon the allocation of land within all three Spatial Areas, including the North Wessex Downs AONB, to meet the District's overall housing needs.</p> <p>As noted within the Housing Background Topic Paper (2023) [Footnote 14: Available online at: https://westberks.gov.uk/media/54001/Housing-Background-Paper-January-2023/pdf/Housing_Background_Paper_January_2023.pdf?m=638102336216470000], the North Wessex Downs AONB Spatial Area covers 74% of West Berkshire. Given the various constraints associated with the Newbury and Thatcham Spatial Area (including environmental, flooding, and heritage constraints), and with the Eastern Area Spatial Area (including flooding constraints and the Detailed Emergency Planning Zone), the Council considers that it is not reasonably practicable to accommodate the entire housing need in these areas.</p> <p>Despite the constraints in these two Spatial Areas, 92% of the residential allocations within the emerging local plan are located in the Newbury and Thatcham and Eastern Area Spatial Areas. Darcliffe generally supports the Council's proposed spatial strategy to the extent that development is clearly and appropriately intended to be directed toward the most sustainable locations.</p> <p>However, Darcliffe contends that in the implementation of this spatial strategy, the Council have missed opportunities to allocate residential development at appropriate and sustainably located sites within the preferred spatial locations within the District. Darcliffe recommends the Council reconsider the omission of an allocation(s) for residential development at the Land west of Little Heath Road, Reading accordingly.</p> <p>Importantly, the site adjoins the highest order settlement within the District, and even within the HMA, being located immediately adjacent to the west of Reading. Furthermore, the site is located adjacent to the District's highest order Spatial Area - the Eastern Area Spatial Area. The site clearly therefore relates favourably regarding the Council's identified spatial strategy, which directs development toward the most sustainable locations.</p> <p>As noted in the Updated Housing Needs Evidence (July 2022) paper, a number of settlements (including Aldermaston, Burghfield and Mortimer) in the southern extent of the Eastern Area are unable to contribute toward meeting local housing need owing to their location within the Atomic Weapons Establishment Detailed Emergency Planning Zone ('AWE DEPZ'). Consequently, this provides an impetus that the remaining settlements of the Eastern Area, such as Tilehurst, should and where appropriate can accommodate the surplus housing needs of this spatial area.</p> <p>It is also relevant that the omission of the large strategic Grazeley Garden Settlement, allocation (c. 15,000 homes), was a consequence of the AWE DEPZ preventing housing deliverability in the east of the District. This further demonstrates that housing should be reallocated elsewhere within the Eastern Area to fulfil the voided supply of homes, as well as capitalise on the lost supply of potential resource associated with the large functional economic market area that is Reading.</p>

The Settlement Hierarchy Study Paper, which forms part of the evidence base supporting the Local Plan Review, classifies Tilehurst and Purley-on-Thames as an 'Urban Area' which forms highest classification for sustainability. Proposed Policies SP1 and SP3 set out the Spatial Strategy for West Berks and states "The scale of development proposals will be expected to be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility".

Boyer has undertaken an assessment of the site against the Council's Sustainability Appraisal ('SA') methodology, which is set out in section 7 of these representations. The assessment demonstrates that the site scores positively in relation to the SA assessment framework. Given the clear positive score of the site against the Council's SA methodology, Darcliffe contends that the site's allocation could be achieved consistent with the Council's proposed spatial strategy.

Furthermore, the scale of development that is proposed for this site will assist with the District's housing delivery both in the short-term and over the life of the plan period. In conjunction with the strategic-scale site allocations the Council's identified housing trajectory relies upon, the development of sites at this medium scale can assist in significantly boosting the supply of housing across the plan period, and specifically within the early part of the plan period.

Paragraph 68 of the NPPF states that local authorities should promote a good mix of sites, with medium-scale sites often able to be built out relatively quickly. This is supported in research conducted by Lichfields [Footnote 15: Available online at: <https://lichfields.uk/content/insights/start-to-finish>], which reports that schemes of 500 dwellings or more take on average between 5 to 8.4 years from the validation of an application for outline planning permission to the delivery of the first new home. The consequence being larger sites, such as the proposed strategic allocations, typically only substantively contribute to new housing delivery later on in the plan's lifespan.

For these reasons, Darcliffe recommends that the Council reconsiders the omission of the site from allocation for residential development prior to the submission of the plan for examination.

Development in the North Wessex Downs AONB Spatial Area

In seeking to identify sufficient development sites to meet the District's local housing needs, the Council has sought to accommodate a modest amount of new homes (approximately 8% of the overall need) within the North Wessex Downs AONB.

Paragraph 174 of the NPPF sets out that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: [inter alia] protecting and enhancing valued landscapes*" such as the country's Areas of Outstanding Natural Beauty. Furthermore, the NPPF clarifies, at paragraph 176, that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in [...] Areas of Outstanding Natural Beauty*".

Given the significant housing need within the District, as set out in the previous discussion, there is clearly a need to accommodate a modest amount of the District's much-needed residential development within the North Wessex Downs AONB Spatial Area. Therefore, although the Council has given great weight to conserving and enhancing the landscape and scenic beauty of the AONB, there is a clear and overriding need to accommodate a modest amount of growth within the Spatial Area if sustainable development is to be achieved.

Darcliffe generally **supports** the Council's proposed spatial strategy to this extent, in which a modest amount of new homes is proposed to accommodate growth within the North Wessex Downs AONB Spatial Area.

Furthermore, in determining appropriate locations to accommodate residential development within the North Wessex Downs AONB Spatial Area, the Council has sought to have due regard to the conservation and enhancement of the landscape and scenic beauty of the AONB, in accordance with Paragraph 176 of the NPPF.

The Council assessed parcels of land within the North Wessex Downs AONB Spatial Area through the Landscape Character Assessment ('LCA') and Landscape Sensitivity Assessment ('LSA') processes, which informed the Council's assessment of the potential suitability of sites for residential development. However, the Council did not assess Land west of Little Heath Road, Reading within the HELAA and therefore did not form a conclusion as to the suitability of the site for development.

Taking into account the LCA / LSA processes, the Council concluded that several parcels of land within the AONB could be appropriate to accommodate development, subject to various recommendations to maintain and enhance the landscape and scenic beauty of the AONB. Darcliffe has undertaken an assessment of Landscape Sensitivity for development at the site, and we set the results out in more detail in Section 6 and Appendix 2 of these representations.

In summary, Darcliffe considers the site would be capable of accommodating the proposed level of residential development whilst conserving and enhancing the broader landscape and scenic beauty of the AONB. This is aided by the site's generally flat topography and the belt of trees aligning the western extent of the site, which ensures the land is visually enclosed from the wider landscape of the AONB.

The Council's proposed site allocations within the North Wessex Downs AONB represent locations where development can best be situated within the landform, or best relate to the existing built form, or are enclosed by substantive established native deciduous tree cover, of value in its own right. As such, Darcliffe considers the allocation of Land west of Little Heath Road, Reading, could be undertaken consistent with the Council's existing and proposed spatial strategy ensuring that the special qualities of the AONB as a whole can be appropriately conserved and enhanced.

With regard to the Land west of Little Heath Road, Reading, the West Reading LSA (2009) assessed the broad area in which the site is situated as part of Parcel 13E 'Little Heath Gravel Plateau'. The LSA concludes that the area demonstrates *low to medium landscape sensitivity* and is characterised by:

- Scattered mixed development broken up by small open areas,
- Good level of visual enclosure, and
- Mostly low to medium historic landscape sensitivity.

	Darcliffe is committed to bringing forward development on the site in accordance with the principal objective of conserving and enhancing the character of the AONB. Further detail is provided in section 6 and Appendix 2 of these representations. However, in principle, Darcliffe contends that the site is capable of delivering the proposed quantum of residential development, adjoining the most sustainable settlement within the District, whilst conserving and enhancing the special qualities of the North Wessex Downs AONB.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne Beaver Properties Ltd (Represented by Nexus Planning)
Consultee Full Name	Pangbourne Beaver Properties Ltd
Consultee Organisation	Pangbourne Beaver Properties Ltd
Agent Full Name	Adam Ross
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1743
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>These representations have been prepared by Nexus Planning on behalf of Pangbourne Beaver Properties Ltd, in response to the West Berkshire Local Plan Review 2022-2039 – Regulation 19 consultation (“the Plan”).</p> <p>We support, in general terms, the spatial strategy set out in Policy SP1, which adopts an approach based on three spatial areas in the district, which include the North Wessex Downs AONB.</p> <p>We also support the requirement for the focus of development in each of these spatial areas to: <i>‘...follow the District-wide settlement hierarchy set out in Policy SP3 which takes account of the function and sustainability of settlements and promotes sustainable communities’.</i></p> <p>We additionally support the spatial approach to the North Wessex Downs AONB itself as referenced in Policy SP1, which seeks to ensure that it delivers appropriate and sustainable growth in this area that conserves and enhances its special landscape qualities.</p> <p>However, despite clearly identifying this spatial strategy in Policy SP1, Policy SP15 fails wholly to have regard to / accord with it.</p> <p>With specific regard to the North Wessex Downs AONB area, Policy SP15 disregards not only the spatial strategy in Policy SP1 but also the settlement hierarchy in Policy SP3, failing to make any development allocations at Pangbourne (a ‘Rural Service Centre’ which also benefits from a railway station), whilst making a series of allocations at settlements in this spatial area that are demonstrably less sustainable / lower down the Council’s own settlement hierarchy.</p> <p>As set out in detail in our representations to Policy SP15, the approach to housing provision in the North Wessex AONB area is unjustified, inappropriate and unsound, and conflicts with the strategy for the district as set out in Policies SP1, SP2 and SP3 of the Local Plan.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	As set out in more detail in our representations to Policy SP15, the approach to housing provision in the North Wessex AONB area, in making no provision for any residential development at the Rural Service Centre of Pangbourne, is fundamentally unsound. It should be corrected by way of a review of the approach to the allocation of sites in the North Wessex AONB area and as part of this, the allocation of Site PAN8 at Pangbourne - as the most sustainable location for development in this spatial area.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	It is important for the Inspector to fully understand the existing flaws with the Plan with specific regard to Pangbourne. This can be best achieved by us presenting oral evidence to the Inspector.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Bell Cornwell LLP))
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Brigid Taylor
Agent Organisation	Bell Cornwell LLP
Comment ID	PS1257
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	PS1257 Bell Cornwell obo Hathor Property attachment.pdf
1. Do you consider the Local Plan Review is legally compliant?	No

* Yes * No	
Please give reasons for your answer	Site Allocations have been selected and the plan finalised for consultation prior to finalisation of HELAA site assessments; decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development. Public comments invited until 3 March, in the knowledge of proposed meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process. Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comment on full assessment of the impact of the proposed development strategy.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	our client is generally supportive of statement in this policy, of the aim to direct development to land of lower environmental value and previously developed land; and the support for appropriate densities to make efficient use of land. It is not clear, however, that the selected allocations are the best means of achieving this strategy, given the heavy reliance on large strategic developments on greenfield sites to meet housing need. The proposed spatial strategy recognises there is a need to allocate greenfield sites, and that housing need cannot be met on brownfield sites alone. We agree this is realistic. However, there is some doubt that the LPR allocates a sufficient number of sites to ensure sufficient housing delivery in the initial 5 year period from adoption. In order to deliver a more robust land supply position, we submit there the Council should revisit its land supply assessment and seek to include additional small/ medium sites (such as our client's site in Brimpton) to ensure quick delivery of sites in the first five years of the plan. The housing land supply position (as at 31 March 2022) relies upon current allocations including the Sandleford Park strategic development location and the LPR also relies on delivery of large scale development at Thatcham. In the short term, there is a need to ensure delivery of sufficient number of dwellings in the early plan period and small/ medium sites must form part of the mix to ensure this.

	<p>Policy SP1 does not give adequate recognition of the requirement to plan for rural villages meeting their own needs. There is support expressed for the rural economy, but not for any rural housing. This is contrary to paragraph 79 of the NPPF, which requires that planning policies identify opportunities for villages to grow and thrive, especially where this will support local services. Paragraph 80 clarifies that policy should avoid the development of isolated homes in the countryside – but this should be interpreted in line with Braintree DC v SSCLG [2018] EWCA Civ.610 which confirms that ‘isolated’ means ‘far away from other places, buildings or people; remote’. Villages such as Brimpton are not ‘remote’ or ‘isolated’ and indeed are in close proximity to the major urban areas of the district and beyond. The policy as worded will rely upon infill/ windfall housing in the existing settlement boundary to deliver any growth in villages such as Brimpton.</p> <p>Our client’s site in Brimpton partially within, and partially adjacent to the settlement boundary. <for map see attachment></p> <p>It is in fact located centrally within the village, in walking distance to the local primary school. It is not isolated, for the purposes of the NPPF, and therefore this LPR should contain policies which would allow for small scale infill development of this site, to support the growth of the village. As presently proposed, the LPR would not support development of the portion of the site outside the settlement boundary, even where the proposal amounted to infill and continuation of the building line, connecting to residential development to the north and south/east and reflecting built form on the opposite side of Brimpton road.</p> <p>When consulting on the Settlement Boundary Review, the Brimpton Parish Council expressed support for the inclusion of our client’s site within an amended boundary. The following is an extract from the appendices to the Settlement Boundary Review Background Paper (December 2022). It identifies the “parcel of land to the west of Forge Stores...and running north between Brimpton Road and the drive to Hilcourt Lodge...There may be a case for including the area within the Settlement Boundary and permitting suitable housing to join up with the building line at the southern end of the existing houses (Manor View) to the north). The Parish Council were of the view they would need to consult with the community before confirming it should be included, given the site’s prominent location in the centre of the village and in close proximity to a public open space. They were unable to do so in the time allowed, so provided this feedback “in the hopes that, it a suitable housing development can be agreed, with both the landowner and the parish, this response will be taken into account when any planning application is considered.”</p> <p>This reinforces, therefore, that the settlement boundary could be amended to incorporate our client’s site to the west of Brimpton Road.</p> <p><for table see attachment></p> <p>The Parish Plan also expresses support for some additional housing development in the village: <i>“Support proposals (subject to compliance with planning regulations and the Village Design Statement) to build up to 10 small private houses over 10 years, affordable to first time buyers and people wishing to downsize, primarily through infilling.”</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include additional site allocations, to ensure sufficient supply of housing in early plan period. In particular, allocate additional small/ medium sites (under 1ha) including our client’s site in Brimpton where there is support for appropriate development which would relate well to the existing settlement. The Policy needs to be amended to include recognition of the need for rural villages to grow and thrive to support their vitality, as set out in the NPPF.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Defence Infrastructure Organisation
Consultee Full Name	Debbie Baker
Consultee Organisation	Defence Infrastructure Organisation
Agent Full Name	
Agent Organisation	
Comment ID	PS886
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to the West Berkshire Local Plan Review Consultation. The Local Plan Review sets out the Council's vision, objectives and spatial planning strategy for West Berkshire up to 2039. Public engagement will form part of the consultation process required under Regulation 19 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, and the responses received will help the West Berkshire Authorities prepare the Proposed Submission Plan.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate.</p> <p>For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other parts of the MOD.</p> <p>Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end, MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.</p> <p>The area covered by any West Berkshire Local Plan will both contain and be washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Benson, RAF Odiham, RAF Welford, Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield and the Central Wide Area Multilateration (WAM) Network.</p> <p>To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.</p> <ul style="list-style-type: none"> • The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Zones are drawn that trigger consultation on development of various heights to ensure that their effect on the protected airspace above and surrounding an aerodrome is assessed and, if necessary, mitigated. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern. • Within the West Berkshire plan area is a new technical asset known as the Central Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into the air traffic management system in the Central areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the West Berkshire Local Plan area. The key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. • Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or flocking birds close to the aerodrome. • Statutory safeguarding zones are designated around Military explosives storage sites, to ensure that development and land uses will be compatible with MOD capability. Within these zones, where applicable, requirements relating to the siting, design, and construction of buildings, or changes to land use may apply. In principle, the MOD does not object to land in the outer explosives safeguarding zone being developed for residential, commercial, and industrial land use purposes. Any buildings within this zone must be 'non-vulnerable' to blast effects, that is of robust construction, so should an explosive event occur, the structure would not collapse or sustain damage that could cause critical injury to the occupants. Of particular concern within this zone are tall buildings (in excess of 3 storeys), light weight construction and large areas of glazing. The MOD will object to development proposals which support people living, working and congregating within the inner explosives safeguarding zone. <p>Copies of these safeguarding maps, in both GIS shapefile and .pdf format, can be provided on request through the email address at the start of this letter.</p>

	<p>It should be recognised that where development falls outside designated safeguarding zones, the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include any development that would exceed a height of 50m above ground level. Tall (of or exceeding a height of 50m above ground level) structures introduce physical obstacles to low flying aircraft. The MOD should be consulted, through DIO Safeguarding, where development exceeds a height of 50m above ground level to ensure that the potential for these structures to form a physical obstacle to low flying aircraft can be addressed through appropriate lighting and charting. In addition, the MOD requests to be consulted on any proposals, regardless of height, which fall outside of an MOD safeguarding zone but are in the vicinity of military training estate or property.</p> <p>On reviewing the potential allocation site and policies for the area, I can confirm the MOD has no statutory safeguarding concerns or suggested amendments to the West Berkshire Local Plan Review.</p> <p>The MOD Safeguarding team would welcome being listed as a consultation body of the West Berkshire Local Plan and will provide representations as and when appropriate in the drafting and consultation stages.</p> <p>I trust this clearly explains our position in relation to this consultation. However, should you have any questions please do not hesitate to contact me.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Thatcham Town Council
<p>Consultee Full Name</p>	Ms Mel Taylor
<p>Consultee Organisation</p>	Thatcham Town Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1644
<p>Chapter / Policy / Appendix Number</p>	Policy SP 1
<p>Chapter / Policy / Appendix Title</p>	Spatial Strategy

Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>“(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”</p> <p>The SA/SEA Environmental Report states:</p> <p>“The Core Strategy had a focus on Newbury and Thatcham, with two strategic sites allocated in Newbury and smaller sites allocated across the rest of the district. This mix of strategic and smaller sites across the district worked well for the Core Strategy by providing flexibility and natural phasing of developments across the plan period. As a result a similar mix of sites is considered to be appropriate for the LPR with no other alternatives considered.”</p> <p>Regulation 12 requires the identification, description and evaluation of ‘reasonable alternatives’. If an approach worked well in the current plan period, it does not follow that it is the best approach for the following plan period – and it is certainly does not follow that there are no ‘reasonable alternatives’.</p> <p>It is incorrect for the SA/SEA to assert that the approach in the current Local Plan has ‘worked well’ by providing ‘natural phasing of developments across the plan period. This is certainly not the case for the Sandleford Strategic Site Allocation. Policy CS3 of the current Local Plan states:</p> <p>“Within the area identified at Sandleford Park, a sustainable and high quality mixed use development will be delivered in accordance with the following parameters:</p> <p>Phased delivery of up to 2,000 dwellings, of which at least 40% will be affordable and with an emphasis on family housing. At least half the housing is planned to be delivered by 2026;”</p> <p>However, as the SA/SEA explains (pages 35-37): “no work has started at the site at Sandleford, with outline planning permission for the eastern part of the site only granted (on appeal) in May 2022.” The site has been re-allocated “as a single site for up to 1500 dwellings”. “Reducing the number of dwellings on the site allowed for better consideration of the constraints on the site (Ancient woodland, drainage, landscape buffers etc.) and will allow for adequate and appropriate mitigation measures to be put in place.”</p> <p>The SA/SEA states (page 25, below the table):</p> <p>“Following the decision that the spatial strategy should focus on Thatcham, strategic site options were considered, based on the sites submitted through the February 2020 HELAA.”</p> <p>Therefore, ‘reasonable alternatives’ that are not around Thatcham were not considered. This decision was also based on the false premise that the town of Thatcham would have sufficient infrastructure to support this development, either at the time of the decision or as a result of the development. The lack of infrastructure in Thatcham is addressed by other representations of the Town Council.</p> <p>The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policy SP1 cannot be legally compliant, because it explicitly states that it has not complied with the requirement to identify, describe and evaluate reasonable alternatives to the proposed policy. The experience of delays in delivery of Sandleford Park in the current plan period (described in paragraphs 6.44 – 6.46 of the draft Local Plan, and the reduction in the number of dwellings from 2,000 to 1,500, suggest that the proposed policy for North East Thatcham is not even the best alternative.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>As explain in Section 1 above, the draft Local Plan explicitly states that no alternatives have been considered. The evidence of the failure of the Sandlford Strategic Site Allocation to deliver the expected number of houses suggests that relying on two strategic sites (with a number of smaller sites) is not even the best approach.</p> <p>As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>A new Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) needs to be undertaken, which considers all 'reasonable alternatives' to the decisions relating to strategic sites and proposed approach of Policy SP1.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1302
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states: “(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. (2) The report shall identify, describe and evaluate the likely significant effects on the environment of— (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”</p> <p>The SA/SEA Environmental Report explicitly states that no alternatives have been considered to the approach in the current Local Plan of two strategic sites and smaller sites allocated across the rest of the district.</p> <p>This is not in accordance with Regulation 12, which requires the identification, description and evaluation of ‘reasonable alternatives’. The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policy SP1 therefore cannot be legally compliant.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	A new Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) needs to be undertaken, which considers all 'reasonable alternatives' to the decisions relating to strategic sites and proposed approach of Policy SP1.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	If it would assist the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1603
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Policy SP1 (Spatial Strategy) – Thakeham supports the Council's approach to the AONB and agrees that any development in this area needs to be sensitively designed to respect its special landscape qualities.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Newbury Community Football Club (Represented by DPDS Consulting Group)
<p>Consultee Full Name</p>	Newbury Community Football Club
<p>Consultee Organisation</p>	Newbury Community Football Club
<p>Agent Full Name</p>	Les Durrant
<p>Agent Organisation</p>	DPDS Ltd
<p>Comment ID</p>	PS902
<p>Chapter / Policy / Appendix Number</p>	Policy SP 1

Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	If a site-specific policy or allocation for LRIE is adopted, then add the following after the fourth paragraph under the Newbury and Thatcham subheading: "Land at the London Road Industrial Estate in Newbury can provide opportunities for intensification of employment use and business development, subject to satisfying the criteria of the relevant site-specific policy".
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1182
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	Yes

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The following sentence could be interpreted in more than one way: "The District's historic environment and environmental assets will continue to be protected and enhanced and used positively in development to establish a distinctive sense of place that nurtures human health and wellbeing."</p> <p>We infer it is intended to cover the District's historic environment and all environmental assets, including include both heritage and natural assets. However, if it is intended to focus only on its historic environment and heritage assets, a minor wording change is needed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1262
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP1 – Spatial Strategy is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council

Agent Full Name	
Agent Organisation	
Comment ID	PS1862
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1862&PS1864 Thatcham Town Council_SA SEA comparison table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

<p>Please give reasons for your answer</p>	<p>The Sustainability Appraisal should be based on evidence, rather than speculation or supposition.</p> <p>Table 30 compares the SA/SEA a development of 2,500 homes (i.e. the proposal for the Regulation 18 consultation) and for 1,500 homes (i.e. the proposal for the Regulation 19 consultation) for North East Thatcham. It should therefore be based on the SP17 Policy for this development in the Emerging Draft Local Plan for the Regulation 18 consultation and the Draft Local Plan for the Regulation 18 consultation.</p> <p>The table below compares the text of Table 30 with the corresponding parts of Policy SP17 in those two consultations.</p> <p>With the exception of secondary education, the version of Policy SP17 for 1,500 homes (i.e. Regulation 19) gives a greater positive impact and confidence in that impact than the version of Policy SP17 for 2,500 homes (i.e. Regulation 18).</p> <p>Nothing can be meaningfully inferred regarding provision of secondary education:</p> <ul style="list-style-type: none"> • The figure of 8FE appears to have been copied from the Thatcham Strategic Growth Study, where it is given very tentatively as a need resulting from other unspecified developments in the Newbury/Thatcham area. • The figure of 2.5FE is below the minimum viable size for a secondary school, so is undeliverable. <p>Thatcham Town Council has provided detailed representations on many aspects of Policy SP17, including primary healthcare, secondary education and the provision of social infrastructure in the town.</p> <p><i>See attached document for Thatcham Town Council comments on SA/SEA < PS1862&PS1864 Thatcham Town Council_SA SEA Comparison Table></i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	A review of Table 30 should be part of a wider review of the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) in relation to North East Thatcham.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1657
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based	

<p>on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Policy SP1 'Spatial Strategy' sets out three spatial areas within the district where development will be focussed. Newbury is identified as a focus for housing development, recognising its 'key role as the administrative centre and major town centre for the District.' The principle of this approach is supported, given it provides the greatest opportunities of delivering sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Speen Parish Council</p>
<p>Consultee Full Name</p>	<p>David Dudman</p>
<p>Consultee Organisation</p>	<p>Speen Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1409</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 1</p>

Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>We concur with the need to maximise the use of brownfield sites and believe that they should be a priority for developments. We note that the development at the old Sterling Cables site is an exemplar of brownfield development.</p> <p>We very much support the statement 'The villages in the surrounding area [of Newbury and Thatcham] will retain their existing role and</p>

	separate identity, with settlement boundaries and Policies SP8, DM1 and DM2 ensuring that physical separation is maintained’.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)
Consultee Full Name	Lochailort Newbury Limited
Consultee Organisation	Lochailort Newbury Limited
Agent Full Name	Sarah Ballantyne-Way
Agent Organisation	Lochailort Investments Ltd
Comment ID	PS1397
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We support the "town centre first" strategy and the sequential approach within it.</p> <p>We note that within Newbury Town Centre, there is a minimum density requirement of 70 dwellings per hectare for flatted developments. We support a minimum density approach however note that the potential for higher densities should be acknowledged, as set out at paragraph 25 of the NPPF, and request that the policy wording is amended as follows (in bold):</p> <p><i>Within Newbury, Thatcham, Tilehurst, Purley on Thames, and Calcot, developments are expected to secure a net density of at least 35 dwellings per hectare with densities of at least 70 dwellings per hectare in town centres and for flatted developments, with the potential for significantly higher densities along main transport routes and close to transport nodes.</i></p> <p>We note that the recent developments in Newbury town centre have consistently achieved densities higher than 100 dwellings per hectare, with Sterling Cables and the Bayer Office development achieving densities at circa 150 dwellings per hectare, and higher.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North East Thatcham Partnership (Represented by Lichfields)
Consultee Full Name	North East Thatcham Partnership
Consultee Organisation	North East Thatcham Partnership
Agent Full Name	Pippa Nisbet
Agent Organisation	Lichfields
Comment ID	PS1491
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	Yes

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Our representations are prepared in relation to the strategic promotion of land known as North East Thattham ("NET") on behalf of "the Partnership" which comprises A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land who are jointly promoting the land ("the site") on behalf of its landowners. The Partnership has signed a collaboration agreement to ensure that the site at NET comes forward as a whole, thereby avoiding piecemeal development. The agreement should give the Council confidence that a comprehensive approach will be delivered and the Partnership remains fully committed to progress a planning application as soon as the site's allocation within the Local Plan is secured.</p> <p>We support Policy SP1's vision and objectives which includes a strategy over the plan period to "optimise the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment." This is in line with the objectives for delivery of the strategic site allocation identified at North East Thattham (NET) (Policy SP17) where both the Partnership's own studies and the Council's background evidence have undertaken work to explore and demonstrate how the site at NET can best deliver the growth which Thattham needs. The evidence indicates the site could accommodate development of up to 2,500 homes with a number of infrastructure improvements such as local centres, education, healthcare, sports provision and open space.</p> <p>We also support the Spatial Strategy's development approach which is based on three spatial areas. This identifies Newbury and Thattham as one of the spatial areas, and notes that development will be required to follow the district-wide settlement hierarchy set out in Policy SP3. The thrust of the strategy aims to promote sustainable communities taking account of the function and sustainability of settlements across the District and Policy SP3 identifies Thattham as an 'urban area' - the urban areas being the prime focus for housing and economic development. Development potential is to be offered through a number of means but importantly includes "b. Strategic and non-strategic sites allocated for housing and economic development through other policies in the LPR or neighbourhood plans" within this. As stated above, the site at NET is included with the LPR as one of these strategic sites.</p> <p>We support the recognition that, "Density on individual sites will vary according to their location and context, size of developable area and site specific issues such as shape and access." We consider these are important determining factors to ensure that the right amount and type of development is brought forward and will usually be determined by further detailed technical work on sites being assessed through the detailed design stages.</p> <p>We note that Allocations will be related to the role and function of settlements and the development opportunities identified through the HELAA and support this as a sustainable and viable approach to identifying suitable sites coming forward through the LPR.</p> <p>We support the policy intention that states, "Thattham will be a focus for regeneration, for new housing and for improved provision of services and facilities" and the identification of NET as "A new urban extension to the north east of the town" which "will provide a new residential neighbourhood with supporting</p>

	facilities and green infrastructure in accordance with Policy SP17." NET has been identified as the most appropriate site to deliver the strategic growth which Thatcham needs and is the only site which has been identified as suitable for delivering this through the LPR and its background evidence. In particular the Vision 2050 for West Berkshire clearly supports the idea of north of Thatcham as being the only direction of growth for the settlement in the long term.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	Please refer to our response on Policy SP17.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn Trainers Association (Represented by Rapleys LLP)
Consultee Full Name	Lambourn Trainers Association
Consultee Organisation	Lambourn Trainers Association
Agent Full Name	Ms Wakako Hirose
Agent Organisation	Rapleys LLP
Comment ID	PS1545
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:57:00
Attached Files	Appendix 1 - Lambourn HRI Cluster.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Lambourn Trainers' Association ('LTA'). LTA represents licensed racehorse trainers in Lambourn, one of the key stakeholders of the success of the Horse Racing Industry (HRI) in Lambourn (known as the Valley of the Racehorse), along with others including Jockey Club Estates (JCE), the owner and operator of Lambourn Training Grounds.</p> <p>The HRI cluster in and around Lambourn is identified on a plan titled Lambourn Horseracing Industry Cluster at Appendix 1 [see attachment]. The success of the HRI is vital to protecting Lambourn's racing heritage dating back to the 18th Century and making a substantial contribution to the economic, cultural and environmental well-being of the area. LTA also recognises that the HRI cluster in Lambourn is located in the North Wessex Downs AONB, where development proposals would need to be considered sensitively, and that the HRI makes a contribution to the character of the AONB.</p> <p>In this context, LTA wishes to ensure that the new Local Plan contains appropriate and clear policies to protect the HRI in Lambourn and to support its future success while recognising its location being within the AONB. Further, a Neighbourhood Plan for Lambourn is being prepared by Lambourn Parish Council, which is understood to include policies for the HRI. While LTA is broadly supportive of the draft Local Plan, it is considered that further amendments are necessary to ensure the effectiveness and the soundness of the Plan, taking into account evidence for the HRI in the area, and a Neighbourhood Plan being prepared for Lambourn.</p> <p>The consultation document recognises that Lambourn serves as the heart of one of the most important areas for horseracing in the country and there is evidence of the HRI's significant contribution to the rural economy as set out above. The Council's support for the retention and growth of the HRI in Lambourn should be identified as part of the Plan's spatial strategy. There is no strategic link to Policy DM37 which specifically addresses the equestrian and horseracing industry.</p> <p>Notwithstanding the strategic importance of the HRI in Lambourn, the draft Policies Map does not identify the location. We note that Newbury Racecourse is identified on the Policies Map. Similarly, Lambourn's</p>

	<p>horseracing industry cluster should be identified on the plan, as a broad location as a minimum, for clarity and effectiveness of the policies. The National Planning Policy Framework (2021) ('NPPF') states that broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map (paragraph 23). Given the strategic importance of Lambourn's horseracing cluster where its growth is supported, it should be identified on the Policies Map.</p> <p>We therefore object to Policy SP1 and consider that following is added to North Wessex Downs AONB spatial area section:</p> <p><i>"The horseracing industry is particularly important to the rural economy, with the Lambourn area being a nationally important location and making a significant economic contribution. The broad area of Lambourn's horseracing industry cluster is identified on the policies map. The HRI in Lambourn will be safeguarded and its expansion supported, as set out in Policy DM37."</i></p> <p>(see attachment)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>North Wessex Downs AONB</p> <p>The North Wessex Downs AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities as set out in Policy SP2.</p> <p><i>The horseracing industry is particularly important to the rural economy, with the Lambourn area being a nationally important location and making a significant economic contribution. The broad area of Lambourn's horseracing industry cluster is identified on the policies map. The HRI in Lambourn will be safeguarded and its expansion is supported, as set out in Policy DM37."</i></p> <p>The Policies Map should identify the horseracing industry cluster in Lambourn.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>In order to respond to the Inspector's MIQs on this matter effectively and clearly.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Sovereign Housing Association Ltd (Represented by Boyer Planning)</p>
<p>Consultee Full Name</p>	<p>Mr Matt Richardson</p>
<p>Consultee Organisation</p>	<p>Sovereign Housing Association Ltd</p>
<p>Agent Full Name</p>	<p>Mrs Michelle Quan</p>
<p>Agent Organisation</p>	<p>Boyer Planning</p>
<p>Comment ID</p>	<p>PS1749</p>

Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	EXECUTIVE SUMMARY Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. Boyer have prepared these representations on behalf of Sovereign, in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039).

The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness. To this end, general support is provided to the spatial strategy set out in the West Berkshire Local Plan Review (2022 – 2039), to the Council's conduct of the plan-making process in relation to the Duty-to-Cooperate, and specifically for the allocation of Land Adjoining The Haven, Kintbury, for residential development.

The Proposed Submission West Berkshire Local Plan (2022 – 2039) ('emerging local plan') proposes to allocate a series of sites to, as a minimum, meet the identified housing needs within the district. Despite the constrained nature of the district, the plan identifies a robust selection of sites that are capable of delivering residential development appropriate to accommodate sustainable growth to meet the minimum local housing need of the area.

Sovereign supports this approach, recognising that the Council's commitment to accommodate the identified minimum Local Housing Need ('LHN') figure within the district is paramount.

The Council's identification of sufficient developable land to deliver approximately 5% additional homes above the minimum identified need is also supported. Sovereign considers that this 5% 'headroom' provides for a flexible and robust quantum of housing supply to fully ensure that the identified housing needs of the district are met.

Furthermore, the identified headroom in the housing supply could usefully accommodate a proportion of the unmet need that is likely to arise from Reading, as part of the Western Berkshire Housing Market Area ('HMA'). Sovereign supports the Council in seeking to accommodate a reasonable proportion of this unmet need and recommends that the Council seek to maximise the delivery of new homes on the proposed site allocations to assist in delivering this aim. Such an approach would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing, ensuring minimum housing needs are met.

In seeking to deliver the amount of new homes required in the district, the Council have identified an appropriate spatial strategy. The emerging local plan recognises that there is limited further growth potential at the district's most sustainable settlements; namely, Newbury and Thatcham, alongside the Eastern Urban Area, whilst maximising the available land within the relevant site allocations. Sovereign supports the Council's identification of a spatial strategy which directs development to available land within the next most sustainable locations as appropriate, in accordance with the settlement hierarchy.

The otherwise relatively unconstrained nature of the North Wessex Downs Area of Outstanding Natural Beauty ('AONB'), in combination with the presence of a series of sustainable medium and smaller-sized Service Villages, provides that the North Wessex Downs AONB Spatial Area (as identified in proposed Policy SP1) remains appropriate to accommodate a reasonable proportion of the district's identified housing needs.

To maintain the longer-term vitality of the district's Service Villages, such as Kintbury, it is imperative that the Council supports the sustainable growth of these areas, supporting the viability of local services and amenities, alongside delivering much-needed affordable housing in rural areas. To this end, Sovereign supports the identification of specific site allocations within these villages, which provide opportunities for modest sustainable growth whilst conserving and enhancing the special landscape qualities of the AONB.

Sovereign therefore supports the identification of Land Adjoining The Haven, Kintbury ('the site') as being suitable for allocation within the emerging local plan, through proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'. Kintbury comprises a relatively unconstrained settlement that can accommodate sustainable growth during the plan period. The site is well-positioned to make a reasonable contribution to meeting the district's development needs.

The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities provided in the village, benefitting from good access to nearby main settlements including Newbury (by bus and rail), Reading, and London Paddington (by rail). There are not considered to be any significant constraints to the development of the site, which could provide at the very least a minimum of 20 high-quality new homes.

Sovereign is able to confirm that the site is available for development now, offers a suitable location for residential development, and is achievable with a realistic prospect that housing can be delivered on-site within the first five years of the proposed plan period. Consequently, the site should be considered favourably in relation to planning practice guidance and its proposed allocation within the emerging West Berkshire Local Plan is supported.

Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant and is capable of being found Sound following independent Examination. Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.

INTRODUCTION

Context

Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. The Site Location Plan is provided at Appendix 1: Site Location Plan.

Sovereign holds a specific land interest within West Berkshire, known as Land adjoining The Haven, Kintbury ('the site'). These representations are aligned with this land interest and address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base, accordingly.

The site has been assessed by West Berkshire District Council ('the Council') within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. Furthermore, the site is proposed for allocation within the Local Plan Review document, to accommodate residential

development, under proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.

The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness, as set out at paragraph 35 of the NPPF; namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:

- a) Positively prepared – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs.
- b) Justified – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.
- c) Effective – deliverable over the plan period and based on effective joint working.
- d) Consistent with national policy – enabling the delivery of sustainable development.

At this stage of the plan-making process, it is essential that West Berkshire District Council ('the Council') continues to pursue an approach that is consistent with national policy, effective, justified, and positively prepared. These representations comprise our recommendations to assist the Council in achieving such an approach, as emerging plan progresses toward adoption.

These representations build upon and should be considered in conjunction with the previous representations submitted by Sovereign to the 'Regulation 18' consultation on the West Berkshire Local Plan Review 2020 – 2037: Emerging Draft (December 2020), which ran from 11 December 2020 to 5 February 2021.

Policy Context

The Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council then adopted the Housing Site Allocations Development Plan Document in May 2017, to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the district therefore sets out the spatial strategy to meet development needs up to 2026 and provides a series of site allocations and planning policies that seek to deliver that strategy.

To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The draft plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption, which is anticipated in 2024.

Sovereign **supports** the Council's commitment to review the existing development plan through this process.

THE SPATIAL DISTRIBUTION OF HOUSING

The NPPF (2021) requires, at paragraph 20, that strategic policies should set out an overall strategy for the pattern, scale, and design quality of places, making sufficient provision for housing and other development needs. Sovereign welcomes the Councils' consideration of alternative options [*Footnote: available online at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>.*] to develop an appropriate spatial strategy for West Berkshire up to 2039, as detailed within the Sustainability Appraisal.

The identified alternative spatial strategy options for the district each seek to direct development toward the most sustainable settlement locations within West Berkshire. Sovereign **supports** the Council's commitment to maximising development at the most sustainable locations in the district.

However, notwithstanding the direction of development toward the most sustainable settlements within the district, each reasonable alternative spatial strategy option ultimately relies upon the allocation of land within all three Spatial Areas, including the North Wessex Downs AONB, to meet the overall housing needs for the district.

As noted within Housing Background Topic Paper (2023) [Footnote 13: Available online at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>], the North Wessex Downs AONB Spatial Area covers 74% of West Berkshire. Given the various constraints associated with the Newbury and Thatcham Spatial Area (including environmental, flooding, and heritage constraints), and with the Eastern Area Spatial Area (including flooding constraints and the Detailed Emergency Planning Zone), it is not considered to be reasonably practicable or sensible to accommodate the district's entire housing need in these areas.

Despite the constraints in these two Spatial Areas, 92% of the residential allocations within the emerging local plan are located in the Newbury and Thatcham and Eastern Area Spatial Areas.

Sovereign **supports** the Council's proposed spatial strategy to the extent that development has clearly and appropriately directed toward the most sustainable locations within the district.

Despite the constraints in these two Spatial Areas, 92% of the residential allocations within the emerging local plan are located in the Newbury and Thatcham and Eastern Area Spatial Areas.

Sovereign **supports** the Council's proposed spatial strategy to the extent that development has clearly and appropriately directed toward the most sustainable locations within the district.

Supporting the Vitality and Viability of Rural Villages

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

In accordance with the discussion set out previously, in Section 3 of these representations, Sovereign recommend that any appropriate spatial strategy for West Berkshire must include the allocation of land to provide sustainable development at different levels across the current settlement hierarchy and within the different Spatial Areas.

Such an approach would align with the general principle of the district's existing spatial strategy, which would support the sustainable growth of the larger settlements, whilst providing sufficient growth for the abundance of medium and smaller-sized villages in the district to support their sustainable growth.

This strategy would also accord with paragraph 78 of the NPPF, which states: "*Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*"

Reductions in average household sizes, alongside low housebuilding rates, present a challenge for rural communities. Without an appropriate uplift in the level of development in these locations, there is a risk that local services in such areas would become unviable, undermining the vitality and sustainability of the district's rural villages.

In addition to helping maintain the vitality of the district's villages, medium and smaller-scale development in appropriate locations will assist with the district's housing delivery, both in the short-term and over the life of the plan period.

Paragraph 68 of the NPPF states that local planning authorities should promote a good mix of sites, with small and medium sites often able to be built out relatively quickly. This is supported in research conducted by Lichfields [Footnote: Available online at: <https://lichfields.uk/content/insights/start-to-finish>] which reports that schemes of 500 dwellings or more take on average between 5 to 8.4 years from the validation of an application for outline planning permission to the delivery of the first new home. The consequence being larger sites, such as the proposed strategic allocations, typically only substantively contribute to new housing delivery later on in the plan's lifespan.

As such, Sovereign **supports** the Council's commitment to allocate sufficient small and medium sized sites to maintain housing delivery throughout the plan period. Furthermore, Sovereign encourages the Council to seek to secure efficient delivery of new homes from any future proposed site allocations, i.e., maximising development potential whilst ensuring appropriate local character and context are respected. This would be particularly important for the smaller and medium-sized sites, which would help to ensure the district meets its housing needs in the shorter-term.

Development in the North Wessex Downs AONB Spatial Area

In seeking to identify sufficient development sites to meet the district's local housing needs, the Council has sought to accommodate a modest amount of new homes (approximately 8% of the overall need) within the North Wessex Downs AONB.

The NPPF, at paragraph 174, sets out that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: [inter alia] protecting and enhancing valued landscapes*" such as the country's Areas of Outstanding Natural Beauty. Furthermore, the NPPF clarifies, at paragraph 176, that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in [...] Areas of Outstanding Natural Beauty*".

Given the significant housing need within the district, as set out in the previous discussion, there is clearly a need to accommodate a modest amount of residential development within the North Wessex Downs AONB Spatial Area. Sovereign **supports** the Council's proposed spatial strategy, in which a modest amount of new homes are proposed to support local communities within the area.

Furthermore, in determining appropriate locations to accommodate residential development within the North Wessex Downs AONB Spatial Area, Sovereign considers that the Council has clearly had due regard to the conservation and enhancement of the landscape and scenic beauty of the AONB, in accordance with Paragraph 176 of the NPPF.

The Council assessed parcels of land within the North Wessex Downs AONB Spatial Area through the Landscape Character Assessment ('LCA') and Landscape Sensitivity Assessment ('LSA') processes, which informed the Council's assessment of the potential *suitability* of sites for residential development.

This assessment is set out within the Council's HELAA (2023). The Council concluded that, taking account of the LCA/LSA process, several parcels of land within the AONB could be appropriate to accommodate development, subject to various recommendations to maintain and enhance the landscape and scenic beauty of the AONB, as set out in Policies SP2, SP15, and, in relation to the Land adjoining The Haven, Kintbury, RSA23.

Consequently, the proposed site allocations represent locations where development can best be situated within the landform, or best relate to the existing built form, or are enclosed by substantive established native deciduous tree cover, of value in its own right. As such, Sovereign considers that the proposed allocations sufficiently ensure that the special qualities of the AONB, and the settlements that sit within it, can be appropriately conserved and enhanced.

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

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

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

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

CONCLUSION

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district, whilst recognising the vital role that modest growth provides to support medium and smaller-sized villages within the North Wessex Downs Area of Outstanding Natural Beauty.

Sovereign supports the Council's commitment to meeting housing needs in full and supports the Council's identification of a reasonable amount of headroom in the district's housing supply to ensure that local housing needs are met during the plan period.

However, Sovereign recommends that the Council seeks opportunities to maximise the development capacity of appropriate sites to ensure that the identified headroom is as robust as is reasonably practicable. Land adjoining The Haven, Kintbury, which is proposed to be allocated for the development of approximately 20 new homes under emerging Policy RSA23, presents such an opportunity. Sovereign considers that the approximate capacity allocated for the site could be higher, without detriment to the amenity of adjoining residents, with sufficient scrutiny to the design of the scheme and in considering greater benefits to the wider community. The provision of additional capacity could reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district.

Furthermore, Sovereign supports the proposed spatial strategy, which includes a modest amount of residential development within the North Wessex Downs AONB Spatial Area. The approach maintains the existing spatial strategy within the district and would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing. The proposed allocations have also been evidenced and justified through detailed analysis to ensure the high value of the AONB and any potential impacts are carefully considered.

Otherwise relatively unconstrained, the nature of the district's North Wessex Downs AONB Spatial Area, which includes the presence of a series of sustainable, small and mediumsized villages, provides that the area remains appropriate to accommodate a reasonable proportion of the district's identified housing need. Furthermore, to support the longer-term viability of these villages, it is critical that the Council supports opportunities to provide modest growth in appropriate locations.

To this end, Sovereign supports the proposed allocation of Land adjoining The Haven, Kintbury, for residential development under emerging Policies SP15 and RSA23. Kintbury comprises a relatively unconstrained settlement that could accommodate a reasonable level of growth during the proposed plan period. Land adjoining The Haven is well-positioned to make a reasonable contribution to meeting the district's development needs in this location.

The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities within Kintbury. Furthermore, the site benefits from good access to nearby main settlement areas via bus and rail links, including Newbury and Reading. There are no significant constraints to the development of the site for approximately 35 new homes which could not be resolved through detailed, sensitive design consideration.

Sovereign is able to confirm that the site is available for development now, represents a suitable location for development, and that development of the site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The site is deliverable and should continue to be favourably regarded in relation to allocation for residential development within the emerging West Berkshire Local Plan.

We look forward to continuing to work with West Berkshire District Council, Kintbury Parish Council, and the wider community to provide much-needed new housing in this rural community. We also look forward to exploring how the Land adjoining The Haven, Kintbury can contribute to the delivery of sustainable development and benefit the village, local infrastructure, and facilities.

We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.

See attached document for a full response <Boyer obo Sovereign_full rep>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or</p>

	<p>would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
4. Proposed Changes	As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1407
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The justification for merging of Eastern and Kennet Valley Spatial Areas is no longer valid. The strict constraint on the building of new homes imposed by the introduction of the DEPZs around the two AWEs means that the merging no longer provides flexibility</p> <p>Object to statement that "... higher densities achievable in the centres of Hungerford, Pangbourne and Theale".</p> <p>Pangbourne and Theale are villages and dwelling density should reflect their village character</p> <p>Disagree that "Theale will be a focus for additional housing through existing commitments and new allocations".</p> <p>The Lakeside site in Theale has outline planning permission for up to 325 units, nine of which have full permission. An adjacent site, allocated in the HAS DPD, has outline permission for 104 houses.</p> <p>These homes will fully utilise services and infrastructure in Theale, particularly health services. This was recognised in Section 4.35 of the Core Strategy, which contained the following statement: "The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead,</p>

	<p>Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". No justification has been given for dropping this requirement from the LPR.</p> <p>Theale will still need that "period of consolidation" once construction at Lakeside has been completed.</p> <p>Transport Assessment / Traffic Modelling</p> <p>The West Berkshire Strategic Transport Model has not been updated for the proposed increase in number of units on the NE Thatcham strategic site from 1,250 to 1,500 in the plan period</p> <p>Disagree that "Theale will be a focus for additional housing through existing commitments and new allocations".</p> <p>The sites Proposed for Theale (RSA10 and RSA11) have not been included in the West Berkshire Strategic Transport Model</p> <p>Air Quality Assessment</p> <p>The Air Quality Assessment has not been updated for the proposed increase in number of units on the NE Thatcham strategic site from 1,250 to 1,500 in the plan period</p> <p>Disagree that "Theale will be a focus for additional housing through existing commitments and new allocations".</p> <p>The sites Proposed for Theale (RSA10 and RSA11) have not been included in the Air Quality Assessment</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The Eastern and East Kennet Valley spatial areas should no longer be merged</p> <p>Statement "... higher densities achievable in the centres of Hungerford, Pangbourne and Theale" should be removed</p> <p>The focus on Theale should be removed and the Core Strategy requirement for a "period of consolidation" should be carried forward to the LPR</p> <p>Transport Assessment</p> <p>The West Berkshire Strategic Transport Model should be updated and re-run for the proposed increase in number of units on the NE Thatcham strategic site from 1,250 to 1,500 in the plan period.</p> <p>Any necessary mitigations then be identified</p> <p>These sites [RSA10 and RSA11] should be included in the Transport Model and any necessary mitigations investigated and modelled</p> <p>Air Quality assessment</p> <p>The Air Quality Assessment should be updated for the proposed increase in number of units on the NE Thatcham strategic site from 1,250 to 1,500 in the plan period.</p> <p>The sites [RSA10 and RSA11] should be included in the Air Quality Assessment</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain the issue to the inspector why this issue makes the plan unsound</p> <p>The focus on Theale should be removed and the Core Strategy requirement for a "period of consolidation" should be carried forward to the LPR</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	<p>Yes</p>

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst NDP Group
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst NDP Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1730
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	Removal of the expectation of housing allocations through NDPs is to be welcomed.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
<p>Consultee Full Name</p>	Newbury & Crookham Golf Club and Chartfield Homes
<p>Consultee Organisation</p>	Newbury & Crookham Golf Club and Chartfield Homes
<p>Agent Full Name</p>	Jonathan Walton
<p>Agent Organisation</p>	Opus Works
<p>Comment ID</p>	PS1291
<p>Chapter / Policy / Appendix Number</p>	Policy SP 1
<p>Chapter / Policy / Appendix Title</p>	Spatial Strategy
<p>Order</p>	13
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	03/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP1 – Spatial Strategy is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	Yes

* Yes	
* No	
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beftonforth Ltd (Represented by PSP Consulting)
Consultee Full Name	Beftonforth Ltd
Consultee Organisation	
Agent Full Name	Patrick Gurner
Agent Organisation	PSPconsulting
Comment ID	PS1515
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	01/03/2023 14:01:00
Attached Files	PSPconsulting on behalf of Beftonforth Ltd REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	All as set out in detail in the Local Plan Review Documentation
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>[See attached document for full accompanying statement - PSPconsulting obo Beftonforth Ltd REDACTED]</p> <p>Please refer to Section 3 and Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 3 - POLICY REVIEW INCLUDING DRAFT POLICIES DM43 AND DM42</p> <p>National Planning Policy Framework (NPPF July 2021)</p> <p>The National Planning Policy Framework (NPPF) has a presumption in favour of sustainable development at its heart. Of particular relevance to the potential for growth in rail use at the Theale Railhead, Beftonforth have highlighted below particular elements of National Policy which support the Government’s intention to increase the use of rail freight to assist in achieving national decarbonisation targets and deliver net-zero.</p> <ul style="list-style-type: none"> • At NPPF paragraph 106(c), planning policies should: “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;” • At NPPF paragraph 106(e) planning policies are also required to: “provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy...” • Footnote 44 on page 31 confirms that: “Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight,” [our underlining]. • NPPF paragraph 83 is clear that in the context of building a strong, competitive economy: “Planning policies and decisions should recognise and address the specific locational requirement of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” [our underlining]. • At NPPF paragraph 152 In the context of meeting the challenge of climate change, the planning system should help to: “shape places in ways that contribute to radical reductions in greenhouse gas emissions...”. • And NPPF paragraph 153 requires that: “Plans should take a proactive approach to mitigating and adapting to climate change...”. • Similarly, NPPF paragraph 154 confirms that new development should be planned in ways that: “can help reduce greenhouse gas emissions...”. <p>The consultation on the December 2022 proposed updates to the NPPF, which run to March 2023, do not propose any material change to the NPPF paragraphs quoted above.</p> <p>The Planning Practice Guidance (PPG) on Climate Change gives advice at paragraph 003 on “How the challenges of climate change can be addressed through the Local Plan”. The Guidance states that “there</p>

are many opportunities to integrate climate change mitigation and adaptation objectives into the Local Plan. Sustainability appraisal can be used to help shape appropriate strategies in line with the statutory duty on climate change and ambition in the Climate Change Act 2008.

Examples of mitigating climate change by reducing emissions:

- Reducing the need to travel and providing for sustainable transport;”

Draft Policies SP1 ‘Spatial Strategy’; SP5 ‘Responding to Climate Change; and SP23 ‘Transport’

Consistent with the above National Policy advice, Beftonforth consider that the following Draft Local Plan Policies should be amended as below:

- Draft Policy SP1 ‘Spatial Strategy’ should be extended to include opportunities to increase and expand the provision for the movement of freight by sustainable means.
- Draft Policy SP5 ‘Responding to Climate Change’ listed criteria should also include an item to demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured.
- Draft Policy SP23 ‘Transport’ should similarly include a requirement for development that generates a transport impact to demonstrate that all options to secure modal shift from road to more sustainable transport means have been explored.
- The Supporting Text to Draft Policy SP23 should include a new paragraph encouraging modal shift for the movement of freight from road to rail.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Yes

Please give reasons for your answer

All as set out in detail in the Local Plan Review Documentation

4. Proposed Changes

Please refer to Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.

SECTION 4 - REQUIRED CHANGES TO MAKE THE PLAN SOUND

With reference to **Response Form Question 2**, in the absence of any wording in the Regulation 19 Submission Draft Local Plan expressly supporting the growth of the Theale Railhead, and with wider omissions with respect to the Spatial Strategy, Climate Change Policy and Transport Policies, the Submission Draft Local Plan is not considered to meet the tests of Soundness for the reasons identified above and summarised below:

The **Submission Draft Local Plan is not positively prepared** since it does not respond to identified need and it does not facilitate sustainable development in accordance with National and Regional Policy.

The **Submission Draft Local Plan is not justified** since it fails to deliver an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives.

There is no clear audit trail as to why this approach has been adopted and changed from the adopted Development Plan and from earlier stages of the current Local Plan Review. The Sustainability Appraisal fails to consider the increased use of rail freight consistent with National and Local Policy, when the evidence points to the need to support the growth in rail freight provision. The Sound approach and reasonable alternative would be to provide supporting text which supports the growth of rail freight at Theale and to have this expressed within the Policy itself.

The **Submission Draft Local Plan is not Consistent with National Policy** in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site-specific considerations of the Theale Rail-Road Transfer Site under Policy DM43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.

Changes required to make the West Berkshire Regulation 19 Proposed Submission Draft Local Plan Sound

With reference to **Response Form Question 4** changes have been identified below which are considered necessary to make the Submission Draft Local Plan Sound. The changes are required to ensure that the Submission Draft Local Plan is positively prepared, justified, and consistent with National Policy.

To address the concerns raised in these representations with regard to Soundness, and specifically the failure of the Submission Draft Local Plan to appropriately identify and support modal shift in the context of the movement of freight, changes are sought below with respect to spatial strategy, climate change and transport policies. Additionally, in site specific terms, express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan ‘Sound’ are shown below in red underline or strike through.

It is confirmed that the schedule of required changes set out below, has been jointly drafted and agreed between Network Rail, Beftonforth and the Englefield Estate.

	(a) Policy SP1, Spatial Strategy (Page 17, third para) “Demand for travel will be managed, and accessibility to sustainable transport opportunities increased through improving choice for transport modes. <u>Opportunities to increase and expand provision of the movement of freight by sustainable means will be supported.</u> Existing community infrastructure will be protected and where appropriate enhanced. Infrastructure requirements will be set out in the Infrastructure Delivery Plan (IDP)”
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To explain in detail to the Inspector, the importance of the Local Plan Review including the opportunity for the growth of rail freight at the Theale Railhead.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1551
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We reviewed Policy SP1 and when taking into consideration the area constraints as listed in section 4.6, we consider it important for the protected areas or the Atomic Weapons Establishments (AWE) areas and how these will affect the development goals to be highlighted in this policy. It is important, especially as the north Wessex downs takes up a large part of the local authority area. Also the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) is in this area. Therefore, details about how these sensitive areas will be protected and safeguarded from development pressures or completing development should be highlighted. For example, there are details of what will be appropriate for the North Wessex Downs AONB in Policy SP2, which is useful</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>Details about how these sensitive areas/protected areas or the Atomic Weapons Establishments (AWE) will be protected and safeguarded from development pressures or completing development should be highlighted in Policy SP1.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes

5. Independent Examination	We wish to attend the examination for an opportunity to explain the need to state the need for protected areas or the Atomic Weapons Establishments (AWE) to protected and safeguarded from development pressures or completing development when taking into consideration the constraints in West Berks as listed in section 4.6.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pittard, Matthew (Represented by Pro Vision)
Consultee Full Name	Mr & Mrs Mathew Pittard
Consultee Organisation	
Agent Full Name	Mr James Blake
Agent Organisation	Pro Vision
Comment ID	PS1700
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:19:00
Attached Files	Pro Vision - Mr & Mrs Pittard
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Policy SP1 confirms the development approach will be based on the District's three spatial areas of Newbury and Thatcham, Eastern Area and North Wessex Downs AONB, where the focus of development will "follow the District-wide settlement hierarchy set out in Policy SP3 which takes account of the function and sustainability of settlements and promotes sustainable communities". We consider this to be an appropriate strategy, focusing new development in the most sustainable parts of the District, as confirmed by the policy's supporting text (paragraph 4.18).</p> <p>Paragraph 4.11 confirms that "The Newbury and Thatcham urban area is the main focus for development in the current Local Plan and will remain the focus in the LPR [Local Plan Review]". At the time of preparing the current Local Plan, this part of the District was considered to be the most sustainable spatial area to deliver the majority of new development. In light of this, the case for focusing new development in this spatial area is even greater now, given the level and range of existing facilities, services and infrastructure in the area, taking account of those also currently coming forwards.</p> <p>Policy SP1 identifies that the spatial strategy "will deliver a range of site sizes for residential development". This is supported and accords with national policy. Paragraph 68 of the NPPF outlines that "planning policies should identify a sufficient supply and mix of sites". Furthermore, paragraph 69 highlights that "small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly", with local planning authorities being encouraged to promote the development of a good mix of sites. Adding to this, a mix of large, medium and smaller scale sites ensure housing needs can be met in different parts of the District.</p> <p>Policy SP1 introduces the proposed new urban extensions to the south of Newbury at Sandford Park and to the north east of Thatcham. Large sites such as these – whilst capable of delivering a significant quantum of new housing – are typically complicated and take time for housing to be delivered. The importance of small and medium sized sites should therefore not be underestimated and indeed in line with the framework, at least 10% of the housing requirement should come from small sites such as our clients site. Our recommendations in this regard are expressed later in these representations. <for full rep see attachment></p> <p>In relation to economic development, Policy SD1 seeks "employment development to meet the existing and future economic demands of businesses... to help promote sustainable patterns of development". This is supported and in line with national policy. Paragraph 20 of the NPPF sets out that "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for housing, employment, retail, leisure and other commercial development". Paragraph 80 of the NPPF identifies that "Planning policies should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity".</p> <p>(Attachment)</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of 'Land at Lower Way Farm, Thatcham' and the shortcomings identified in the Local Plan Review and its evidence base relation to the allocation of sites and land for housing and economic delivery are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hindocho, Atul (Represented by Iver Consulting Ltd)
Consultee Full Name	Atul Hindocho
Consultee Organisation	
Agent Full Name	Huw Williams
Agent Organisation	Iver Consulting Ltd
Comment ID	PS1651
Chapter / Policy / Appendix Number	Policy SP 1
Chapter / Policy / Appendix Title	Spatial Strategy
Order	13
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:52:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>NPPF clearly states Brownfield sites to be brought forward for development prior to the release of greenfield sites Re-use of brownfield sites prior to release of greenfield land for redevelopment It is a requirement of all Local Authority's to seek the re-use of brownfield sites prior to the release of green field sites for residential development. This is particularly so when sites such as the former Newbury Leisure Park are redundant and available for development. Concluding remarks The NPPF states "local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs" Priority should be given to brownfield sites before release of greenfield sites</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	<p>Yes</p>

* Yes * No	
5. Independent Examination	The use of brownfield sites prior to greenfield release should be a fundamental objective of the local plan which needs to be addressed. We would therefore wish to have a seat at the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 2 North Wessex Downs AONB

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS153
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This is not a criticism, but the economic success of the AONB landowners and farmers is essential to secure the income by which the AONB can be sustained.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>A better designation would be "Area of Outstanding Cultivated Landscape".</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Musgrave and Begley, M&W (Represented by Fisher German LLP)</p>
<p>Consultee Full Name</p>	<p>Mr M and W Musgrave and Begley</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	<p>Angela Brooks</p>
<p>Agent Organisation</p>	<p>Fisher German LLP</p>
<p>Comment ID</p>	<p>PS146</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 2</p>
<p>Chapter / Policy / Appendix Title</p>	<p>North Wessex Downs AONB</p>
<p>Order</p>	<p>15</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	<p>E-Mail</p>

* Web * Unknown	
Response Date	14/02/2023 14:36:00
Attached Files	Fisher German obo MusgraveandBegley
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>This consultation response has been prepared by Fisher German on behalf of our clients Mr M Musgrave and Mr W Begley in respect of their land adjacent to Oxford Road, Chieveley, as illustrated in the attached.</p> <p>The land, which extend to circa 6.58ha, is located to the east of Chieveley. The site is defined by residential development and Graces Lane to the south, Oxford Road to the east, residential development and East Lane to the north and a field to the west. The site benefits from mature boundary planting and forms a logical infill location close to the centre of Chieveley.</p> <p>These representations follow the order of the policies within the Submission Plan, wherein we have not commented we have no specific comments at this stage. If you have any questions regarding these representations, please contact the author.</p> <p><i>Extract of response relevant to consultation point:</i></p> <p>We support the overarching aim of the policy which seeks to protect the special landscape area. However, we have fundamental issues with elements of the policy. In particular, the presumption that development within the AONB can be simply delivered elsewhere. There are a number of settlements within the AONB that should be allowed to grow sensibly and sustainably to support their long term interests. Whilst housing can be delivered elsewhere, clearly this does not provide the localised benefits, including the</p>

	<p>delivery of new market and affordable housing, to enable young people and families to buy in these AONB areas. Failure to deliver new housing will serve to increase house prices and drive away young people. The Council's own evidence (Updated Housing Needs Assessment May 2022) highlights a significant affordable housing need within the AONB, equating to 173 dwellings per annum. This provides significant justification for a sensible approach to housing delivery in the AONB.</p> <p>Failure to deliver new housing will also result in the ageing of the population, as younger people are forced to move out of the area, to the detriment of localised services and facilities and the aim of delivering balanced, healthy and distinct communities. Sites within the AONB should be looked at on their own individual merits, including overall contribution to the AONB. Sites which are of lower value should be viewed as acceptable, where they deliver significant localised community benefits, including new market and affordable housing.</p> <p><i>For full response please see attachment.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hermitage Parish Council
<p>Consultee Full Name</p>	Nicky Pierce
<p>Consultee Organisation</p>	Hermitage Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS386
<p>Chapter / Policy / Appendix Number</p>	Policy SP 2
<p>Chapter / Policy / Appendix Title</p>	North Wessex Downs AONB
<p>Order</p>	15
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	27/02/2023 10:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	HPC does not feel competent to provide such detailed comments on proposals for other parishes; but we would like to express our support for the following overarching policies: <ul style="list-style-type: none"> • SP2 North Wessex Downs AONB. In particular we support the statement that "The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, should be preserved." We respectfully suggest that it should be made clear that the preference for dark skies applies equally to villages in the AONB (insofar as compatible with safety) since street lighting spills over into adjacent countryside.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS591
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>6. Policy SP2 - "If it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities of the AONB will be sought." – This statement needs revisiting as it excludes far too much of the district. A problem of this size needs the whole district to resolve the problem and these areas need to be included to spread the impact.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North Wessex Downs AONB
Consultee Full Name	Rebecca Davies
Consultee Organisation	North Wessex Downs AONB
Agent Full Name	
Agent Organisation	
Comment ID	PS677
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 12:33:53
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	Yes

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS780
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP2 – NORTH WESSEX DOWNS - AREA OF OUTSTANDING NATURAL BEAUTY</p> <p>This AONB is not a Natural Area. It has important Geological features, but the Flora and Fauna on the Lands are very constrained by intensive Farming & Forestry. There is no Strategic Policy in respect of the Rural Economy and Agriculture</p> <p>Overall, having lived in many villages in the AONB, and more recently in Boxford for 3 years I do feel that the over reliance on a Planning Officer defining the Settlement Boundaries does rather stifle the Organic Growth of the villages. They are becoming Unaffordable and very affluent areas and every property is bought up for expansion. There are hardly any 2–3-bedroom Bungalows left for the ageing population. Electronically Gated properties are created, Dark skies are compromised with the desire for</p>

	<p>Street Lights, Bats are driven away to allow Developments to go ahead, and Pavements are now required for Safe Active Travel.</p> <p>Generally new residents do not have much empathy with Wildlife which is a reason for having Nature Recovery at the heart of our LPR Objectives. Rather than Barbour Wellies and Jackets the latest desirable 'Must Have' is a Mini-Digger, and bright Security Lighting that can be left on all night under the guise of Security.</p> <p>Again, within Chapter 7 - which should read Economic & Employment Growth there is no Policy for Agriculture, Forestry and there are no DM Policies under Chapt.12. Apart from DM36 - Farm Diversification which is rather specific.</p> <p>And the terminology in terms of Countryside vs. Rural vs. AONB definitions is not inherently clear within the Policies.</p> <p>I doubt we will ever again see Organic Growth back in our Rural settlements and as the Affluent are not really Bus users achieving sustainable Bus Networks for the AONB is highly unlikely.</p> <p>Maybe it is the way the Submission Document is structured however I am glad I am not reviewing it for Rural or AONB or Countryside Content as it would be better to have all relevant DM's grouped together.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Jardim, Jean-Claude
<p>Consultee Full Name</p>	Jean-Claude Jardim
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS440
<p>Chapter / Policy / Appendix Number</p>	Policy SP 2
<p>Chapter / Policy / Appendix Title</p>	North Wessex Downs AONB
<p>Order</p>	15

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 00:49:15
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	I have no reason to believe it is illegal, but I'm not a legal expert.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	Yes, although the sheer volume of text and ancillary documents does present a challenge to cooperation with the public.

4. Proposed Changes	In Policy SP 2 (North Wessex Downs AONB), as most of this area is agriculture and farmland, I'd like to see objectives mentioned that while protecting the AONB, also enable and encourage farmers to produce more to food for the local towns. If the local towns consumed more local produce this would reduce West Berkshire overall Carbon Footprint, and contribute towards more sustainable and robust local economies.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1759
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Policy SP2: North Wessex Downs AONB</p> <p>Darcliffe supports draft Policy SP2 insofar as it recognises that the North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.</p> <p>However, to improve the effectiveness of the policy, it is recommended that the draft policy should explicitly set out that the principle of development is considered to be acceptable for the sites that are allocated within the North Wessex Downs AONB Spatial Area. This would avoid the subsequent need for each individual planning application to demonstrate that there are exceptional circumstances to make the development acceptable.</p> <p>The Local Plan has already established that there are indeed exceptional circumstances to support development within the North Wessex Downs AONB Spatial Area, which ensure that such modest growth is within the public interest to come forward. Acknowledging that the allocated sites are acceptable, in principle, in this regard will avoid potential complications and delays further along in the planning process.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As such, the following criteria is recommended to be included:</p> <p>i) Sites within the North Wessex Downs AONB that are allocated for development within the West Berkshire Local Plan Review (2022 – 2039) are acceptable for development in principle and will be supported provided that they conserve and enhance the special landscape qualities of the AONB.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne Beaver Properties Ltd (Represented by Nexus Planning)
Consultee Full Name	Pangbourne Beaver Properties Ltd
Consultee Organisation	Pangbourne Beaver Properties Ltd
Agent Full Name	Adam Ross
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1746
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	No

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>These representations have been prepared by Nexus Planning on behalf of Pangbourne Beaver Properties Ltd, in response to the West Berkshire Local Plan Review 2022-2039 – Regulation 19 consultation (“the Plan”).</p> <p>We support the spatial objective to deliver appropriate and sustainable growth in the North Wessex Downs Area of Outstanding Natural Beauty in a way that conserves and enhances its special landscape qualities.</p> <p>However, as set out further in our representations to Policies SP1, SP3 and specifically Policy SP15, the allocations made in the Local Plan fail to deliver appropriate and sustainable growth in this important area, making <u>no development allocations</u> at Pangbourne (a ‘Rural Service Centre’ which also benefits from a railway station), whilst making a series of allocations at settlements that are demonstrably less sustainable / lower down the Council’s own settlement hierarchy.</p> <p>As set out in detail in our representations to Policy SP15, the approach to housing provision in the North Wessex AONB spatial area is unjustified, inappropriate and unsound, and conflicts with the strategy for the district as set out in Policies SP1, SP2 and SP3.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The approach to housing provision in the North Wessex AONB area should be fundamentally reviewed and specifically, Site PAN8 at Pangbourne should be allocated as part of this strategy - as the most sustainable location for development in this spatial area.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>It is important for the Inspector to fully understand the existing flaws with the Plan with specific regard to Pangbourne. This can be best achieved by us presenting oral evidence to the Inspector.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sulham Estate (Represented by Barton Willmore now Stantec)
Consultee Full Name	Mr Henry Scutt
Consultee Organisation	Sulham Estate
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1635
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>On the scope of the Regulation 18 Consultation we commented that Policy SP2 represents an unnecessary duplication of paragraphs 176-177 of the National Planning Policy Framework (NPPF). We note that the wording of this Policy remains broadly the same as in the previous version of the Draft Local Plan. This is inconsistent with the Planning Practice Guidance, which states that all plans need to be as focused, concise, and accessible as possible [Paragraph: 002 Reference ID:61-002-20190315].</p> <p>As such, we consider that the policy should be revised to remove duplication and refer to the relevant sections of the national policy instead.</p> <p><u>Paragraphs 4.29 and 4.30</u></p> <p>We note that the supporting text to Policy SP2 (paras 4.29 and 4.30) sets out what constitutes ‘Major Development’ in the context of the AONB.</p> <p>Footnote 60 of the NPPF states that:</p> <p>“for the purposes of paragraphs 176 and 177, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”.</p> <p>National Policy is therefore clear that whether a development is ‘Major’ is a matter for the decision maker and, as such, is subjective and dependent on site-specific circumstances. In our view, the Draft Local Plan seeks to incorporate a prescriptive approach which contradicts the deliberate flexibility afforded by Footnote 60 (above). We fundamentally consider that this approach is inappropriate and unsound on the basis that it is inconsistent with National Policy.</p> <p>In addition to our ‘in principle’ objection, we also raise particular objection to the specific wording of items i), ii) and iv) under para 4.29 within the Draft Local Plan Review and make additional comments below.</p> <p>Points i) and ii) under para 4.29 advise that the starting point of assessment will be the definitions of ‘Major’ and ‘Minor’ development set under the Town and County Planning (Development Management Procedure) (England) Order 2015 (DMPO). Reference to the DMPO is erroneous and conflates two entirely separate definitions of ‘Major’.</p> <p>Footnote 60 does not make any reference to the definitions of major and minor development set out in the DMPO, but rather states that, for the purposes of this definition in the context of the AONB, the development’s nature, scale and setting are to be taken into account. If the DMPO was relevant to the decision maker’s judgement, national policy would state this. The fact it does not is a clear indication that the definitions are unrelated and should not be conflated.</p> <p>Point iv) under para 4.29 states that <i>the ‘determination as to whether a development is ‘Major’ will consider whether it has the potential to have a significant adverse impact alone or in combination with other development’.</i> We consider that this requirement is unsound and is inconsistent with National Policy. There is no reference in national policy to assessments of development within the AONB being undertaken considering an ‘in combination’ impact. Paras 176-177 and Footnote 60 are clear in reference to ‘the development’ as a singular. There is no reference to consideration in combination with other development. As such, we consider that this point is not consistent with national policy.</p> <p>Our position is supported by a relevant Legal Opinion (available here: Guidelines-on-Significance-for-SDNP-Planning-Applications—NPPF-Complaint-July-2014.pdf (southdowns.gov.uk)), where the Solicitor undertakes a review of caselaw, guidance and appeal decisions aiming to understand the reasoning for a development to be considered ‘Major’ in the context of the AONB.</p> <p>The Legal Opinion concludes that ‘the overarching principle is that the determination of whether a proposal amounts to ‘major development’ for the purposes of paragraph 116 of the NPPF (now paras 176-177) is a matter of planning judgment to be decided by the decision maker in light of all the circumstances of the application and the context of the application site’ (para 24).</p> <p>Furthermore, the Legal Opinion states that it would be wrong in law to apply the definition of ‘major development’, as well as any set or rigid criteria to defining major development (para 25). As a matter of planning judgement, the decision maker must consider the application in its local context (para 27).</p> <p>Although we do not object to the points vi) to xii) under para 4.30, we query whether these are an unnecessary duplication of national policy.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	In light of the above discussions, we recommend that para 4.29 of the Draft Local Plan is fully deleted to ensure consistency with National Policy. Furthermore, we consider that Policy SP2 should be revised to remove an unnecessary duplication of paragraphs 170-173 of the NPPF and refer to the relevant sections of the national policy instead.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chieveley Parish Council
Consultee Full Name	Kim Lloyd
Consultee Organisation	Chieveley Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1496
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Chieveley Parish broadly supports Policy SP2 which recognises the importance of the AONB and the protection that it must be given in accordance with National Planning Policy and that planning permission should be refused for major development in the AONB except in exceptional circumstances.</p> <p>However, the presumption in the supporting text at 4.30 viii. Is not consistent with paragraph 177 of the NPPF which does not contain any presumption that just because something is proposed in the AONB, including housing, there must be a local need which should be met inside the AONB.</p> <p>See proposed changes below.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>Policy SP2 supporting text.</i> 4.30 viii. <i>[Add Where under vi the need for development in the location proposed location is demonstrated.] the cost of, and scope for, meeting the need in some other way; [Delete ; on the assumption that it is a local need which should ideally not be met outside the AONB;]</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes</p>	<p>Yes</p>

* No	
5. Independent Examination	We wish to ensure the reasons for these views on the transposition of national policy into the Local Plan are understood.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1408
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	The statement "planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest" is too restrictive
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Restricting development to this extent would increase pressures for development elsewhere in the district. It would also allow villages to "wither on the vine" because their population would age and thus reduce the viability of services such as shops, pubs, primary schools and churches.</p> <p>Major developments SHOULD be allowed in the AONB where they do not have a significantly adverse effect on landscape character.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	Yes

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1772
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Draft LPR Policies SP1 and SP2 propose to continue the Core Strategy approach of allowing 'appropriate and sustainable growth' in the AONB, with provision made for residential development across a mix of several large, small and medium sites predominantly in the west of the District (draft LPR Policy SP15). In light of the increasing housing needs in the District (explained further below) and the challenges of accommodating these needs, a greater allowance should be made for new development in sustainable areas in the east of the AONB close to the Eastern Area, including at Englefield and Bradfield Southend. A positive approach should be taken to considering development proposals which are commensurate in scale and extent in the AONB which reflects guidance set out in paragraphs 78 and 172 of the NPPF.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p><i>A greater allowance should be made for new development in sustainable areas in the east of the AONB close to the Eastern Area, including at Englefield and Bradfield Southend. A positive approach should be taken to considering development proposals which are commensurate in scale and extent in the AONB which reflects guidance set out in paragraphs 78 and 172 of the NPPF.</i></p> <p><i>Please see covering letter for further details.</i></p> <p><i>Attachment: Full Representation</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1183

Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We support the proposed policy, including taking account of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. We note this is supported by paragraph 4.28.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1820
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The spatial strategy for the North Wessex Downs AONB is set out in proposed Policy SP2 (North Wessex Downs AONB) and confirms that there will be appropriate and sustainable growth that conserves and enhances its special landscape qualities. The Housing Background Paper (January 2023) sets out at paragraph 5.7 that allocations within the AONB have been directed to the settlements within the settlement hierarchy.</p> <p>It is of note, however, that the LPR does not allocate any housing to Pangbourne and only very limited housing to both Hungerford and Lambourn (the two other larger settlements within the AONB).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington Valley Group (Represented by Barton Willmore now Stantec)
Consultee Full Name	Paul Michael
Consultee Organisation	Donnington Valley Group
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1345
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>On the scope of the Regulation 18 Consultation we commented that Policy SP2 represents an unnecessary duplication of paragraphs 176-177 of the National Planning Policy Framework (NPPF). We note that the wording of this Policy remains broadly the same as in the previous version of the Draft Local Plan. This is inconsistent with the Planning Practice Guidance, which states that all plans need to be as focused, concise, and accessible as possible [Paragraph: 002 Reference ID: 61-002-20190315].</p> <p>As such, we consider that the policy should be revised to remove duplication and refer to the relevant sections of the national policy instead.</p> <p><u>Paragraphs 4.29 and 4.30</u></p> <p>We note that the supporting text to Policy SP2 (paras 4.29 and 4.30) sets out what constitutes 'Major Development' in the context of the AONB.</p> <p>Footnote 60 of the NPPF states that:</p> <p>"for the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined".</p> <p>National Policy is therefore clear that whether a development is 'Major' is a matter for the decision maker and, as such, is subjective and dependent on site-specific circumstances. In our view, the Draft Local Plan seeks to incorporate a prescriptive approach which contradicts the deliberate flexibility afforded by Footnote 60 (above). We fundamentally consider that this approach is inappropriate and unsound on the basis that it is inconsistent with National Policy.</p> <p>In addition to our 'in principle' objection, we also raise particular objection to the specific wording of items i), ii) and iv) under para 4.29 within the Draft Local Plan Review and make additional comments below.</p> <p>Points i) and ii) under para 4.29 advise that the starting point of assessment will be the definitions of 'Major' and 'Minor' development set under the Town and County Planning (Development Management Procedure) (England) Order 2015 (DMPO). Reference to the DMPO is erroneous and conflates two entirely separate definitions of 'Major'.</p> <p>Footnote 60 does not make any reference to the definitions of major and minor development set out in the DMPO, but rather states that, for the purposes of this definition in the context of the AONB, the development's nature, scale and setting are to be taken into account. If the DMPO was relevant to the decision maker's judgement, national policy would state this. The fact it does not is a clear indication that the definitions are unrelated and should not be conflated.</p> <p>Point iv) under para 4.29 states that the 'determination as to whether a development is 'Major' will consider whether it has the potential to have a significant adverse impact alone or in combination with other development'. We consider that this requirement is unsound and is inconsistent with National Policy. There is no reference in national policy to assessments of development within the AONB being undertaken considering an 'in combination' impact. Paras 176-177 and Footnote 60 are clear in reference to 'the development' as a singular. There is no reference to consideration in combination with other development. As such, we consider that this point is not consistent with national policy.</p> <p>Our position is supported by a relevant Legal Opinion (available here: Guidelines-on-Significance-for-SDNP-Planning-Applications---NPPF-Complaint-July-2014.pdf (southdowns.gov.uk)), where the Solicitor undertakes a review of caselaw, guidance and appeal decisions aiming to understand the reasoning for a development to be considered 'Major' in the context of the AONB.</p> <p>The Legal Opinion concludes that 'the overarching principle is that the determination of whether a proposal amounts to 'major development' for the purposes of paragraph 116 of the NPPF (now paras 176-177) is a matter of planning judgment to be decided by the decision maker in light of all the circumstances of the application and the context of the application site' (para 24).</p>

	Furthermore, the Legal Opinion states that it would be wrong in law to apply the definition of 'major development', as well as any set or rigid criteria to defining major development (para 25). As a matter of planning judgement, the decision maker must consider the application in its local context (para 27). Although we do not object to the points vi) to xii) under para 4.30, we query whether these are an unnecessary duplication of national policy.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	In light of the above discussions, we recommend that para 4.29 of the Draft Local Plan is fully deleted to ensure consistency with National Policy. Furthermore, we consider that Policy SP2 should be revised to remove an unnecessary duplication of paragraphs 170-173 of the NPPF and refer to the relevant sections of the national policy instead.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1604
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Policy SP2 (North Wessex Downs AONB) – The approach to development within the AONB is broadly supported, however a true assessment of a development site within the AONB cannot be undertaken without robust and up to date evidence; something that Thakeham considers is currently lacking, as highlighted. Moreover, in locations where there is a specific need to support a local industry, such as the village of Lambourn and the racing industry, the Reg 19 Local Plan must make sure that the right amount of development is coming forward to support this. The proposed Reg 19 Local Plan allocations total 65 homes, when added to the further 25 homes to come forward through the neighbourhood plan process, it would reveal a 3% increase on the number of households (3,750), according to 2011 Census data (2021 Census data on specific settlements currently unavailable). Thakeham suggests that given the delay to the delivery of the allocations to date and the fact that these are being carried forward into the Reg 19 Local Plan, the future needs of Lambourn and the thriving racing industry are being misrepresented.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1150
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	Yes

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><u>Policy SP2</u></p> <p>On the scope of the Regulation 18 Consultation we commented that Policy SP2 represents an unnecessary duplication of paragraphs 176-177 of the National Planning Policy Framework (NPPF). We note that the wording of this Policy remains broadly the same as in the previous version of the Draft Local Plan. This is inconsistent with the Planning Practice Guidance, which states that all plans need to be as focused, concise, and accessible as possible [Paragraph: 002 Reference ID: 61-002-20190315].</p> <p>As such, we consider that the policy should be revised to remove duplication and refer to the relevant sections of the national policy instead.</p> <p><u>Paragraphs 4.29 and 4.30</u></p> <p>We note that the supporting text to Policy SP2 (paras 4.29 and 4.30) sets out what constitutes 'Major Development' in the context of the AONB.</p> <p>Footnote 60 of the NPPF states that:</p> <p>"for the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined".</p> <p>National Policy is therefore clear that whether a development is 'Major' is a matter for the decision maker and, as such, is subjective and dependent on site-specific circumstances. In our view, the Draft Local Plan seeks to incorporate a prescriptive approach which contradicts the deliberate flexibility afforded by Footnote 60 (above). We fundamentally consider that this approach is inappropriate and unsound on the basis that it is inconsistent with National Policy.</p> <p>In addition to our 'in principle' objection, we also raise particular objection to the specific wording of items i), ii) and iv) under para 4.29 within the Draft Local Plan Review and make additional comments below.</p> <p>Points i) and ii) under para 4.29 advise that the starting point of assessment will be the definitions of 'Major' and 'Minor' development set under the Town and County Planning (Development Management Procedure) (England) Order 2015 (DMPO). Reference to the DMPO is erroneous and conflates two entirely separate definitions of 'Major'.</p> <p>Footnote 60 does not make any reference to the definitions of major and minor development set out in the DMPO, but rather states that, for the purposes of this definition in the context of the AONB, the development's nature, scale and setting are to be taken into account. If the DMPO was relevant to the decision maker's judgement, national policy would state this. The fact it does not is a clear indication that the definitions are unrelated and should not be conflated.</p>

	<p>Point iv) under para 4.29 states that the 'determination as to whether a development is 'Major' will consider whether it has the potential to have a significant adverse impact alone or in combination with other development'. We consider that this requirement is unsound and is inconsistent with National Policy. There is no reference in national policy to assessments of development within the AONB being undertaken considering an 'in combination' impact. Paras 176-177 and Footnote 60 are clear in reference to 'the development' as a singular. There is no reference to consideration in combination with other development. As such, we consider that this point is not consistent with national policy.</p> <p>Our position is supported by a relevant Legal Opinion (available here: Guidelines-on-Significance-for-SDNP-Planning-Applications---NPPF-Complaint-July-2014.pdf (southdowns.gov.uk)), where the Solicitor undertakes a review of caselaw, guidance and appeal decisions aiming to understand the reasoning for a development to be considered 'Major' in the context of the AONB.</p> <p>The Legal Opinion concludes that 'the overarching principle is that the determination of whether a proposal amounts to 'major development' for the purposes of paragraph 116 of the NPPF (now paras 176-177) is a matter of planning judgment to be decided by the decision maker in light of all the circumstances of the application and the context of the application site' (para 24).</p> <p>Furthermore, the Legal Opinion states that it would be wrong in law to apply the definition of 'major development', as well as any set or rigid criteria to defining major development (para 25). As a matter of planning judgement, the decision maker must consider the application in its local context (para 27).</p> <p>Although we do not object to the points vi) to xii) under para 4.30, we query whether these are an unnecessary duplication of national policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>In light of the above discussions, we recommend that para 4.29 of the Draft Local Plan is fully deleted to ensure consistency with National Policy.</p> <p>Furthermore, we consider that Policy SP2 should be revised to remove an unnecessary duplication of paragraphs 170-173 of the NPPF and refer to the relevant sections of the national policy instead.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Sovereign Housing Association Ltd (Represented by Boyer Planning)
<p>Consultee Full Name</p>	Mr Matt Richardson
<p>Consultee Organisation</p>	Sovereign Housing Association Ltd
<p>Agent Full Name</p>	Mrs Michelle

	Quan
Agent Organisation	Boyer Planning
Comment ID	PS1613
Chapter / Policy / Appendix Number	Policy SP 2
Chapter / Policy / Appendix Title	North Wessex Downs AONB
Order	15
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Policy SP2: North Wessex Downs AONB</p> <p>Sovereign support draft Policy SP2 insofar as it recognises that the North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.</p> <p>However, to improve the effectiveness of the policy, it is recommended that the draft policy should explicitly set out that the principle of development is considered to be acceptable for the sites that are allocated within the North Wessex Downs AONB Spatial Area. This would avoid the subsequent need for each individual planning application to demonstrate that there are exceptional circumstances to make the development acceptable.</p> <p>The Local Plan has already established that there are indeed exceptional circumstances to support development within the North Wessex Downs AONB Spatial Area, which ensure that such modest growth is within the public interest to come forward. Acknowledging that the allocated sites are acceptable, in principle, in this regard will avoid potential complications and delays further along in the planning process.</p> <p><i>See attached document for a full response <Boyer obo Sovereign_full rep></i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
<p>4. Proposed Changes</p>	<p>As such, the following criteria is recommended to be included:</p> <p>i) Sites within the North Wessex Downs AONB that are allocated for development within the West Berkshire Local Plan Review (2022 – 2039) are acceptable for development in principle and will be supported provided that they conserve and enhance the special landscape qualities of the AONB.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 3 Settlement Hierarchy

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Musgrave and Begley, M&W (Represented by Fisher German LLP)
Consultee Full Name	Mr M and W Musgrave and Begley
Consultee Organisation	
Agent Full Name	Angela Brooks
Agent Organisation	Fisher German LLP
Comment ID	PS147
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 14:36:00
Attached Files	Fisher German obo MusgraveandBegley
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This consultation response has been prepared by Fisher German on behalf of our clients Mr M Musgrave and Mr W Begley in respect of their land adjacent to Oxford Road, Chieveley, as illustrated in the attached.</p> <p>The land, which extend to circa 6.58ha, is located to the east of Chieveley. The site is defined by residential development and Graces Lane to the south, Oxford Road to the east, residential development and East Lane to the north and a field to the west. The site benefits from mature boundary planting and forms a logical infill location close to the centre of Chieveley.</p> <p>These representations follow the order of the policies within the Submission Plan, wherein we have not commented we have no specific comments at this stage. If you have any questions regarding these representations, please contact the author.</p> <p><i>Extract of response relevant to consultation point:</i></p> <p>The identification of Chieveley as one of the more sustainable settlements in West Berkshire is supported, as is its identification as a 'Service Village'. As demonstrated by the Council's published supporting Settlement Audit, Chieveley benefits from a high level of service provision, which serves both the settlement itself and wider rural hinterland, particularly the smaller hamlets to the north and west.</p> <p>Policy SP3 states that Service Villages "offer some limited and small-scale development potential, appropriate to the character and function of the village". Such development will be delivered to meet local needs through development within the settlement boundary and through new allocations. Whilst windfall infill development can be appropriate, it is vital to ensure that there is sufficient land allocated to deliver housing needs for a number of reasons. Firstly, the supply of infill land is likely to be highly constrained, particularly having regard for the level of such development to date. Suitable infill land is a highly finite resource, and it cannot be expected to continue to deliver at past rates, as suitable sites and opportunities to deliver such development will have diminished by now. Secondly, there is considered to be significant benefit in seeking to positively meet local housing needs through housing allocations, as piecemeal development will not contribute to the funding of infrastructure through developer contributions nor contribute to the delivery of much needed affordable housing. The positive allocation of land, combined with robust site-specific policies, will ensure the delivery of high-quality developments, the provision of funding for any infrastructure deficiencies and the provision of much needed affordable housing. Finally, such an approach can promote garden grabbing and other forms of development which can be harmful to settlement character.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS237
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	No additional comments.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Aldermaston Parish Council
Consultee Full Name	Aldermaston Parish Council
Consultee Organisation	Aldermaston Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS432
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	27/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We are also pleased to note that Aldermaston is no longer classed as a Service Village due to its reduction in key services over the last 10 years (Appendix 5 to Review of Settlement Hierarchy Topic Paper mentioned in para 7.3 – Employment Land Review 2020)
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS592
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>7. Policy SP3. There is a 57.3% increase in development proposed for Theale. We object to further development as it is not proportionate to the settlement.</p> <p>8. Policy SP3 – Rural Service Centres – Service Villages. Woolhampton and Cold Ash are included but these are not service villages. The Plan needs to state the impact new development will have on utilities, services, and villages. Theale schools do not have the capacity to have a higher intake, nor the doctors surgery. Theale is not a Rural Service Centre as it does not have key services so should be moved to the Service Village section as Theale does not meet the criteria for a Rural Service Centre.</p> <p>Sentence “These smaller rural settlements may offer some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs through” – we object and disagree to this sentence.</p> <p>9. 4.33. Theale does not meet this as there is insufficient infrastructure, services, and public transport.</p> <p>10. 4.34. Local services are already oversubscribed in Theale and could not cope with more demand. Theale has no leisure centre and no direct public transport to any leisure centre. Theale schools are either at capacity or very close to capacity so could not cope with an increase in demand. The GP surgery has no more capacity. We have little other facilities e.g. no dentist etc.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gallagher, Terence (Represented by Bluestone Planning)
Consultee Full Name	Mr & Mrs Terence Gallagher
Consultee Organisation	
Agent Full Name	Jeremy Flawn
Agent Organisation	Bluestone Planning
Comment ID	PS370
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 09:27:00
Attached Files	Jeremy Flawn (Mr and Mrs Gallagher) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	Yes

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>Extract of full response relevant to this consultation point:</i> Policy SP3 sets out the Settlement Hierarchy as settlements listed as either Urban Areas, Rural Service Centres or Service Villages. The policy adds that development in smaller settlements, with settlement boundaries, but which are not listed in the hierarchy, will be delivered in accordance with Policy SP1- as above. However the approach outline in this policy is not reflective of the approach to development in relation to settlements as identified in the NPPF. <i>For full response see attachment.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To discuss the merits of the settlement boundary matters
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Central Corporation Projects Ltd (Represented by Bell Cornwell)
Consultee Full Name	Central Corporation Projects Ltd
Consultee Organisation	Central Corporation Projects Ltd
Agent Full Name	Michael Cole
Agent Organisation	Bell Cornwell LLP
Comment ID	PS697
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:55:00
Attached Files	PS687 Bell Cornwell (Central Corporation Projects) Full Respons
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<i>Extract of representation relevant to consultation point</i> We support the continued recognition of Theale as a Service Centre within the hierarchy set out within the Local Plan and support that Theale is seen as a focus for additional housing within the Eastern Area of the District. Whilst we do not object to its definition as a 'Rural Service Centre' (Policy SP3), as noted in the Regulation 18 consultation we consider that this could be appropriately simplified to 'Service Centre'. It is not accurate to describe Theale as a rural area, given its location on the edge of Reading and in very close proximity to the major roads network as well as large scale housing and employment areas. Rural Service Centres are described in the emerging local plan as having 'reasonable accessibility'. Theale's accessibility is higher than this and could justifiably be described as 'excellent'. It may therefore be more appropriate to separate Theale out from the other 'rural' service centres which are smaller scale and less accessible and put it in a separate category of 'service centre' or 'small town'.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>To discuss matters in dispute relating to Policy RSA10 in respect of the area of allocation and, density and quantum of development.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Trustees of Allan Snook Will Trust (Represented by Pro Vision)
Consultee Full Name	Trustees of Allan Snook Will Trust
Consultee Organisation	Trustees of Allan Snook Will Trust
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS660
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The Council's current approach to 'smaller villages' with a defined settlement boundary seeks to severely restrict any housing growth, such as at Boxford. The Council's approach is flawed and will have serious implications for rural communities, contrary to the aims of national policy.</p> <p>The National Planning Policy Framework ('the Framework'), at paragraph 79, confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Furthermore, it states that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. For the reasons set out below, it is not considered that the Council's proposed Settlement Hierarchy, as set out at Policy SP3, allows for this.</p> <p>Policy SP3, as drafted, notes that, "Development in smaller settlements with settlement boundaries, and which are not included in the settlement hierarchy, will be delivered in accordance with Policy SP1.</p>

	<p>Development outside of these settlements, in other rural hamlets and in isolated groups of development will be restricted to that which is appropriate in a rural area as set out in Policy DM1.”</p> <p>The supporting text, at paragraph 4.37, expands by stating: <i>“Settlements outside of the settlement hierarchy will deliver additional development but this will be limited to infill or change of use within the settlement where a settlement boundary has been defined, and to rural exception schemes for affordable housing to meet local needs. Some limited development is important for the long-term sustainability of rural communities. Outside these settlements, in the countryside, a more restrictive approach to development will be taken as set out in other policies in the LPR.”</i></p> <p>Therefore, the Council’s current approach to ‘smaller villages’ with a defined settlement boundary seeks to severely restrict any housing growth, such as at Boxford.</p> <p>The Council’s approach is flawed and will have serious implications for rural communities, contrary to the aims of national policy. It does not support the vitality of rural communities since it fails to identify opportunities for these villages to grow and thrive. The effect of failing to permit any reasonable scale development in these villages is that house prices in these areas will likely rise to levels which create cost barriers for residents and workers. The lack of affordable housing provision will determine who can live in these rural villages contrary to the overarching aim of improving affordability as a key objective of the Plan. Indeed, the Housing Needs Assessment Update (dated, July 2022) prepared by Icení (on behalf of the Council) demonstrates that within the North Wessex Downs AONB area - which includes Boxford - that there is a significant affordable housing need of 152 affordable and social rented homes per annum, and a further 160 shared ownership homes. This equates to 46% of the overall need for affordable and social rented homes and 43% of the shared ownership need in the district.</p> <p>Furthermore, and what the Council have failed to consider, is that many people in fact desire living in rural locations in West Berkshire, and to provide new housing in such locations is to meet the strategic objective of providing a range of sites to meet the district’s housing needs and aspirations.</p> <p>The lack of housing growth within villages such as Boxford risks the decline of services and facilities, which inevitably leads to such places falling into a ‘sustainability trap’ and becoming dormant communities. Further, without any investment through development, there is potential to leave these villages without appropriate digital infrastructure which is vital to support modern life in rural communities moving forward.</p> <p>In the ‘smaller villages’ with defined settlement boundaries, the Council should seek to bring forward opportunities for growth to enhance their vitality and viability and to support the wider rural economy. Specifically, reasonable scale sites can provide a suitable housing mix and variety of tenures to meet local needs. Indeed, these sites may help attract and retain younger residents and provide housing for older residents to downsize and, as a result, potentially free up larger family housing in the village. Younger residents and larger households can generally put more money into the local economy through local shops, pubs and sporting facilities which in turn support older, less mobile residents by keeping facilities local and more accessible.</p> <p>Furthermore, reasonable scale development in the ‘smaller villages’ with a defined settlement boundary may be able to help rural communities deliver their aspirations for new local infrastructure either by providing a land resource or via S106/CIL contributions.</p> <p>Policy SP3 as currently worded may provide very limited small-scale housing growth in these villages. Indeed, there is likely to be little opportunity for any significant housing within the settlement boundary and no delivery of affordable housing.</p> <p>However, it is concluded that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy, and noting that many available sites in the ‘smaller villages’ with a defined settlement boundary have been overlooked contrary to paragraph 79 of the Framework. In light of the Council’s identified housing shortfall and the need to support the vitality of rural communities, it is considered that those ‘smaller villages’ with a defined settlement boundary – such as Boxford – could help the Council meet any identified housing shortfall. Alternatively, the Plan could require ‘small villages’ with a defined settlement boundary to prepare Neighbourhood Plans to allocate sites to deliver reasonable scale growth to enhance their vitality and viability and that can help deliver the aspirations of the community.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>In light of the Council’s identified housing shortfall and the need to support the vitality of rural communities, it is considered that those ‘smaller villages’ with a defined settlement boundary – such as Boxford – could help the Council meet any identified housing shortfall. Alternatively, the Plan could require ‘small villages’ with a defined settlement boundary to prepare Neighbourhood Plans to allocate sites to deliver reasonable scale growth to enhance their vitality and viability and that can help deliver the aspirations of the community.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>

5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Kimberley Parry
Agent Organisation	Neame Sutton Ltd
Comment ID	PS632
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	Donnington New Homes agrees with the Settlement Hierarchy, where Hungerford is identified as a Rural Service Centre. The Council has allocated 55 homes to Hungerford, recognising its locational sustainability.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	The unmet need arising from Reading must, therefore, be fully addressed now.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Marriage (Represented by ET Planning)

Consultee Full Name	Messrs Marriage
Consultee Organisation	
Agent Full Name	Robyn Milliner
Agent Organisation	ET Planning
Comment ID	PS402
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We are supportive of the settlement hierarchy identified within Policy SP3, particularly the identification of Thatcham as an urban area which is defined as 'The main urban areas with a wide range of services and opportunities for employment, community and education. Serving a large catchment area with good levels of accessibility and frequent public transport provided to a large number of destinations'.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To represent my clients' best interests and explain the merits of the site and why it should be included within the site boundary
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Limes Leisure Investments (Represented by Knight Frank)
Consultee Full Name	Limes Leisure Investments
Consultee Organisation	Limes Leisure Investments LLP
Agent Full Name	Emily Brosnan
Agent Organisation	Knight Frank
Comment ID	PS599
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:42:10

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Under Policy SP3, we support the proposed settlement hierarchy. Future development should be focused in urban areas, especially Newbury. By adopting this approach, the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land (previously developed land).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS701
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park West (SPW)</p> <p>The principle of Newbury continuing to be a 'prime focus for new development' as set out in Policy SP3 – Settlement Hierarchy is also supported. Newbury and Thatcham continue to be the most sustainable locations for new development providing a range of services, together with linkages to higher order services in surrounding cities. New development, and the associated increase in population, will mean that existing services will continue to thrive and also support new ones, which, in turn, will mean both Newbury and Thatcham can continue to be the key economic and social hubs of the District. On the basis that Newbury is the most sustainable settlement in the District, clarification that the scale of new development in those areas will 'be expected to....' be proportionate to the level of services and facilities in the settlement is welcomed – Sandleford Park West is of a scale that has the ability to sustain existing, and support new services and facilities in and around Newbury.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	To make the relevant points before the Inspector and provide answers to any queries arising.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1172
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	Yes

cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support. We welcome the re-incorporation of Lambourn as a "Rural Service Centre" (see also Paragraph 4.18) with the ability to meet local housing needs through the allocation of housing sites. Indeed Lambourn can fulfil Strategic Objective 2 to provide a range of housing and sites for housing.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	Please see other submissions on this specific point <See Rep: ID1170>
4. Proposed Changes	NA
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We do not consider the LPR is generally sound and would like to participate in the examination. See our other representations.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holybrook Parish Council
Consultee Full Name	Pamela Kirkpatrick
Consultee Organisation	Holybrook Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS626

Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 11:04:49
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The Parish of Holybrook is not mentioned specifically in this policy. Does that mean it is not included in SP3 or is it grouped with Calcot? It is difficult to engender the sense of space in terms of reference within the document if it does not relate to the area in question. It also diminishes any credibility and reputation that the Parish has built since its formation in 2000 (Holybrook is made up of two suburbs of Reading: Beansheaf Farm and Fords Farm, together with part of the older suburb of Calcot that lies south of the

	A4 Bath Road and a section of Southcote). 'Calcot' falls into the two very different Parishes of Tilehurst and Holybrook and it is an oversight to ignore their individuality.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	The Parish Council previously raised concern that it is not mentioned in the policy but the policy has not been updated or the question addressed.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rectory Homes Ltd
Consultee Full Name	Steven Kerry
Consultee Organisation	Rectory Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS751
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:09:00
Attached Files	Rectory Homes REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><i>[For full response see attached document]</i></p> <p>Whilst we generally agree with the strategic approach to development in the District as outlined in the settlement hierarchy and Policy SP3, the circumstances in which development on windfalls sites is deemed to be acceptable in the rural service centres and service villages continue to be unduly restrict. 'Infill' sites and change of use within the settlement boundary are not typically of the scale that will require the delivery of affordable housing. Whilst the policy criteria refer to rural exception affordable housing schemes as acceptable development in these tier settlements, there is no certainty that such sites will be delivered. In our experience, landowners are much less willing to release their land for rural exception schemes given the typically lower land values.</p> <p>We consider a more successful approach to secure the delivery of affordable tenure homes within these settlements is through the provision of a market-led housing scheme with policy-compliant on site affordable housing deliver. The criteria of Policy CP3 as currently drafted will not facilitate the delivery of such schemes however. We therefore suggest a further criterion is added to the policy that permits the delivery of suitable sites on the edge of settlements (outside of the settlement boundary) but which accord with the settlement pattern, is commensurate in scale to the settlement and which will have limited adverse impacts on the character and appearance of the area. This is a positive, proactive and a more realistic approach to securing much needed affordable housing within the more rural settlements.</p> <p>It is also unclear what the Council's position on 'infill' development is as this is not clearly defined within Policy CP3. Many different LPAs have differing positions on the definition of 'infill' sites and 'infill' development. There is a description of what constitutes 'infill' development at Policy DMI which refers to residential development in the open countryside, but not in the context of sites within the settlement boundary or defined Rural Service Centres or Service Villages. For clarity, the term 'infill' should be defined within Policy CP3 so that applicants are clear which sites would meet this definition.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS781
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP3 SETTLEMENT HIERARCHY</p> <p>It is what it is. Quite constrained for Rural Villages which is a great pity as it has now become almost only possible for the Affluent to live in our Rural Areas. The less Affluent are priced out, there is little supply and no Plans to deliver replacement Affordable or Social Housing and private Rental is very expensive.</p> <p>The overall approach just feels like there are influences at play other than logical apportionment of developments within Boundaries, and the conflicts between Settlement Boundaries, Ward Boundaries, Parish Boundaries, Landscape Character Appraisal Boundaries, Appropriate Countryside Designation Boundaries, Employment Boundaries need a thorough review especially for N& NE part of Newbury Clayhill Ward, Shaw-c-d, Speen, Cold Ash & Thatcham North East.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes

5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gleeson Strategic Land Ltd
Consultee Full Name	Mr Peter Rawlinson
Consultee Organisation	Gleeson Strategic Land Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1117
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Gleeson supports the settlement hierarchy set out under Policy SP3 which identifies Rural Service Centres such as Burghfield Common as offering development potential appropriate to the character and function of the settlement. As set out in the supporting text the services and facilities provided by Rural Service Centres such as Burghfield Common provide a focal point for the surrounding villages and rural areas, and are sustainable locations for new development.</p> <p>The Plan recognises that the newly defined Detailed Emergency Planning Zone (DEPZ) around AWE sites of Aldermaston and Burghfield could limit the development potential of those areas and specific regard should be given to Policies SP2 North Wessex Downs AONB and SP4 Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield. Burghfield Common is not within the AONB but is now within the enlarged AWE Burghfield DEPZ.</p> <p>To summarise the above points, Gleeson Land supports the overall intentions of the Local Plan Review to deliver sustainable development for the district, the settlement hierarchy and the spatial strategy. However, it is considered that there should be a requirement for an earlier review of the Local Plan should any changes arise in the AWE Burghfield and AWE Aldermaston DEPZ's or the capabilities of the Emergency Planning Services that may change the acceptability of new residential development in areas currently covered by the DEPZ. In addition the housing target should be more clearly defined at the upper end of the given range. It should be clear throughout the whole Plan that the housing target is for 9,146 dwellings (538dpa), plus the 230 dwellings of unmet need from Reading Borough Council. This unmet need should be provided for in new site allocations now, rather than being left for a later review. Serious consideration should also be given to increasing the overall housing target further to support the delivery of more affordable homes given the very high need for such homes</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	<p>Yes</p>

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1210
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Our client has an agreement with the landowners of the site, known as ‘Land to the rear of The Hollies’ in the District, which currently forms part of an allocated site for approximately 60 dwellings under Policy HSA16 in the adopted Housing Site Allocations Development Plan Document (HSADPD) (May 2017).</p> <p>It is understood the ‘emerging draft’ Local Plan Review (LPR) no longer seeks to carry this allocation forward. This is despite part of the allocated site having already been built out and now occupied by residents. The Council say this is because the site now falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. The DEPZ was extended as a result of the updated Radiation (Emergency Preparedness and Public Information) Regulations (REPIR) 2019.</p> <p>Our client does not support the removal of this allocated site from the Development Plan. Our client is keen to work collaboratively with the Council to secure the development of the remaining part of this currently allocated site. These representations therefore focus on responding to the removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield.</p> <p>These representations also seek to respond to the Council’s development strategy (including Policies SP1 and SP3, SP12 and SP14) and decision-making in relation to an effective ‘moratorium’ on new development within Burghfield Common, despite the village remaining as a ‘Rural Service Settlement’, which offers ‘development potential appropriate to the character and function of the settlement’, according to the proposed Spatial Strategy.</p> <p>These representations also discuss Policy RSA12, which seeks the provision of approximately 100 dwellings within Burghfield Common¹, within the extended DEPZ.</p> <p>In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021) paragraph 35. This identifies that a sound Plan is:</p> <ol style="list-style-type: none"> 1 a) Positively Prepared– ‘providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development’; b) Justified– ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’; c) Effective – ‘deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground’; and d) Consistent with National Policy – ‘enabling the delivery of sustainable development in accordance with the policies in this Framework’. <p>It is in light of these criteria that the LPR (Regulation 19) version has been considered. We find the de-allocation of site HSA16 is not consistent with the Council’s approach to its development strategy and the settlement hierarchy. In addition, its approach towards a ‘moratorium’ on further development within the parish of Burghfield Common is flawed.</p> <p>Policy SP3 identifies Burghfield Common as a ‘Rural Service Centre’, which offers “<i>development potential appropriate to the character and function of the settlement through: Infill or changes of use within the settlement boundary; non-strategic sites allocated for housing and economic development through other policies in the LPR or neighbourhood plans; and rural exceptions affordable housing schemes</i>”.</p> <p>However, this policy appears to be at odds with the Council’s position in respect of The Hollies as it does not rule out further development in Burghfield Common, despite the approach taken within Policy SP4 which sets out that proposals for development within the DEPZ are likely to be refused.</p> <p>Burghfield Common is recognised by Table 1 of the LPR as a Rural Service Settlement meaning that it has a good range of services and opportunities. Paragraph 4.32 of the draft plan states “<i>the six rural service centres across the District provide a focal point for the surrounding villages and rural areas in terms of the provision of services and facilities. Although they do not have as wide a range of services as the urban areas, they are still sustainable locations</i>”. The draft LPR does not therefore support the</p>

	<p>vitality of the rural community of Burghfield Common since it fails to identify further opportunities for the village to grow and thrive. The LPR is contrary to the NPPF in that regard.</p> <p>Conclusion</p> <p>These representations have been prepared by Pro Vision on behalf of our client, T A Fisher & Sons, in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039 (Regulation 19) (January 2023).</p> <p>Our client has an agreement with the landowners of the site known as 'Land to the rear of The Hollies' in the District, which currently forms part of allocated site 'HSA16', in the adopted HSADPD (May 2017).</p> <p>We note the allocation for the site is no longer included within the 'emerging draft' LPR, as the site falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield, despite there being a remainder of 32 units still to be delivered.</p> <p>Our client does not support the removal of this allocated site from the LPR.</p> <p>These representations have therefore focused on responding to the unjustified removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield as well as the development strategy and spatial hierarchy proposed by the LPR.</p> <p>In particular, we consider the remaining number of dwellings should be carried forwards in the LPR as the development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	To ensure that the views of our client in respect of the removal of the allocated site known as 'Land to the rear of The Hollies, Burghfield Common' and the inconsistencies in the spatial strategy, particularly towards development within the DEPZ, are heard
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley

Comment ID	PS1738
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	5.2 Policy SP3 'Settlement Hierarchy' – We support this policy as it identifies Newbury as an urban area, with urban areas being the primary focus for housing development.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pittard, Matthew (Represented by Pro Vision)
Consultee Full Name	Mr & Mrs Mathew Pittard
Consultee Organisation	
Agent Full Name	Mr James Blake
Agent Organisation	Pro Vision
Comment ID	PS1701
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:19:00
Attached Files	Pro Vision - Mr & Mrs Pittard
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Policy SP3 sets out the proposed settlement hierarchy for the District, building upon the spatial strategy outlined in Policy SP1. The Urban Areas of Newbury, Thatcham and the Eastern Urban Areas of Tilehurst, Calcot and Purley on Thames are outlined as being the "prime focus for housing... development, offering development potential through:</p> <ol style="list-style-type: none"> 1 regeneration and change in the existing built up area; and 2 strategic and non-strategic sites allocated for housing... development". <p>These urban areas are the most sustainable locations in the District and are therefore correctly identified as being the focus for growth. We agree with the hierarchy proposed, which has been informed by the Review of Settlement Hierarchy Topic Paper (November 2020).</p> <p>Policy SP3 sets out the proposed settlement hierarchy for the District, where the Urban Areas of Newbury, Thatcham and the Eastern Urban Areas of Tilehurst, Calcot and Purley on Thames are outlined as being the "prime focus for... economic development, offering development potential through:</p> <ol style="list-style-type: none"> a) regeneration and change in the existing built up area; and b) strategic and non-strategic sites allocated for... economic development". <p>Again, we agree with the hierarchy proposed for... economic development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	To ensure that the views of our client in respect of 'Land at Lower Way Farm, Thatcham' and the shortcomings identified in the Local Plan Review and its evidence base relation to the allocation of sites and land for housing and economic delivery are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1313
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	Yes

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Object (in relation to Gorse Covert)</p> <p>The focus on key urban areas, encompassing strategic sites and non-strategic sites allocated in this plan review is supported subject to inclusion of Land South of Gorse Covert as an expansion to Policy SP16 Sandleford Park Strategic Allocation and set out in Policy SP13 of this plan review.</p> <p>Please see representations in respect of Policies SP12 <Rep ID:1317>, SP13< Rep ID:1320>and SP16 <Rep ID:1324>.</p> <p>Support (in relation to Sandleford Park).</p> <p>The focus on key urban areas, encompassing strategic sites allocated in Newbury, is supported.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

<p>publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Wasing Estate (Represented by Pro Vision)
Consultee Full Name	The Wasing Estate
Consultee Organisation	The Wasing Estate
Agent Full Name	Sarah Pyne
Agent Organisation	Pro Vision
Comment ID	PS1750
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	03/03/2023 10:35:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on</p>	No

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The National Planning Policy Framework, at paragraph 79, confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Furthermore, it states that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. For the reasons set out below, we do not consider that the council's proposed settlement hierarchy, as set out within Draft Policy SP3, allows for this.</p> <p>Draft Policy SP3 identifies the district's 'Urban Areas', 'Rural Service Centres' and 'Service Villages'. As the Plan is currently drafted, neither Brimpton or Aldermaston Wharf villages are proposed to fall within any of these categories, but the draft Policy Map identifies that they benefit from a defined settlement boundary.</p> <p>Draft Policy SP3, as drafted, notes that, "Development in smaller settlements with settlement boundaries, and which are not included in the settlement hierarchy, will be delivered in accordance with Policy SP1. Development outside of these settlements, in other rural hamlets and in isolated groups of development will be restricted to that which is appropriate in a rural area as set out in Policy DM1."</p> <p>The supporting text, at paragraph 4.37, expands by stating: "Settlements outside of the settlement hierarchy will deliver additional development but this will be limited to infill or change of use within the settlement where a settlement boundary has been defined, and to rural exception schemes for affordable housing to meet local needs. Some limited development is important for the long-term sustainability of rural communities. Outside these settlements, in the countryside, a more restrictive approach to development will be taken as set out in other policies in the LPR."</p> <p>We note that the council also place the same restriction to allow only infill or changes of use to development within Rural Service Centres, and Service Villages (as stated within draft Policy SP3).</p> <p>Paragraph 6.31, in respect of the role of settlement boundaries, states that "Sites within settlement boundaries are not being allocated. This is because settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations." This sentiment is also repeated at paragraph 3.1 of Appendix 3.</p> <p>The Estate objects to the council's inconsistent approach to development within settlement boundaries. It is apparent that settlement boundaries, as a "long established planning tool" identify areas in which development is considered acceptable in principle, nevertheless in many instances the council are proposing to limit development to only 'infill or change of use'. This is unnecessary and unjustified, and this restriction should be removed to encourage growth.</p> <p>Draft Policy SP3 does (in principle) allow for non-strategic sites to be allocated for housing and economic development, albeit at the 'service village' level, through other policies in the Plan or in Neighbourhood Plans. We support this and would add that allocating nonstrategic sites to 'smaller villages' would not be inconsistent with the draft LPR spatial strategy. However, the Estate maintains its objection to the draft LPR only identifying housing site allocations at the 'service village' level and above and considers that smaller villages and rural areas are also able to make a contribution to housing supply as well as to delivering a wider choice of homes.</p> <p>The council's Site Selection Methodology document (January 2023) confirms that, in respect of assessing potential sites for development, states:</p> <p>"Sites which were not ruled out in the HELAA were assessed to determine which settlement they fell in. Sites in settlements below the hierarchy or in 'open countryside' have been ruled out from further consideration because they are considered to be within unsustainable locations. The exception to this has been the employment sites as several of the Designated Employment Areas are located in locations outside of the settlement hierarchy. In addition, paragraph 85 of the NPPF is clear that planning policies should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport."</p> <p>The Estate objects to this approach and have concern that this will have serious implications for rural communities. If development in the 'smaller villages' continues to be severely restricted, and without opportunities for growth in suitable locations within and around these villages, rural communities and their valued services and facilities will continue to decline and it is conceivable that they may disappear altogether. The draft LPR does not support the vitality of rural communities since it fails to identify opportunities for these villages to grow and thrive. The LPR is contrary to the NPPF in that regard.</p> <p>We also note that the council is still maintaining its stance that Aldermaston Wharf should not be classified as a service village despite scoring 21 points as set out within the evidence base related to the Settlement Hierarchy. Aldermaston Wharf scored highly enough to be, and it performs the function of, a 'service</p>

village'. It is a sustainable settlement, with key services including a village hall, access to employment opportunities and a convenience store. In addition to this, there is a public house, a private school, mobile library service, a nursery, recreation ground and children's play area.

As noted in the Topic Paper, Aldermaston Wharf benefits from excellent public transport and is highly accessible. There is a mainline railway station and bus stops, providing regular services to Reading, Newbury, Thatcham and Beenham. A footpath and cycleway has recently been constructed, which connects Aldermaston Wharf with Aldermaston Village.

Aldermaston Wharf and Aldermaston Village are very well linked and should be looked at holistically. Aldermaston Village provides key services and facilities, such as a primary school, a convenience store, a village hall and a farm shop, all of which are easily accessible from Aldermaston Wharf.

Aldermaston Village is currently a 'service village' in the Core Strategy but is proposed to be downgraded as part of the LPR settlement hierarchy review. We reiterate that we do not support this approach and consider that Aldermaston Village should remain a 'service village', given there has been no significant change to the settlement, nor any known loss of key services and facilities.

It is evident that the decision to categorise both Aldermaston Wharf and Aldermaston

Village as 'smaller villages' is not justified for the above reasons. Moreover, it would appear that sufficient weight has not been given to the high level of accessibility of Aldermaston Wharf in the settlement hierarchy review. We therefore encourage the Council to reconsider this, noting that both Aldermaston Wharf and Aldermaston Village both clearly perform the function of 'service villages' and are scored at the 'service village' level.

As a 'service village', it would clearly be appropriate and consistent with the LPR's spatial strategy to allocate a housing site at Aldermaston Wharf to help sustain the range of services and facilities, improving the vitality of the village and in turn, supporting the wider rural economy, noting that "where there are groups of smaller settlements, development in one village may support services in a village nearby" (NPPF Paragraph 79). Housing allocation sites should not be precluded due to a perceived lack of services and facilities. Rural housing is essential to ensure the long-term viability of these services and facilities.

Notwithstanding this, even as a 'smaller villages', housing site allocations at Brimpton and Aldermaston Wharf, including BRIM1, BRIM2 and ALD5 which are located adjacent to the existing settlement, would be consistent with wider aims to sustain a prosperous rural economy. For the council to make a blanket statement that sites in settlements below the hierarchy or in open countryside have been ruled out of further consideration because they are unsustainable is inconsistent with the fact that many rural villages have defined settlement boundaries, which in turn suggests that the principle of new development is acceptable. Furthermore, and what the council have failed to consider, is that many people desire living in rural locations, and to provide new housing in such locations is to meet the strategic objective of providing a range of sites to meet the district's housing needs and aspirations. The LPR is therefore not justified, not consistent with national policy and not positively prepared. The LPR is therefore unsound.

Previous representations in respect of sites BRIM1, BRIM2 and ALD5 are appended for the Inspectors consideration (Appendix A and B respectively) to highlight that these are suitable locations to accommodate new residential development. This is particularly important given the objections that are raised in respect of the council's overall approach to the delivery of housing, below. We note that in respect of Site ALD5, the council had concerns over flood risk on part of the site; to alleviate these concerns and clarify the current position in terms of the extent of flood risk on the site, we enclose (at Appendix C) a short letter from Dr Chris Whitlow of Edenvale Young and confirm that the Estate is willing to provide further technical information as and when required. Draft Policy SP12 'Approach to Housing Delivery'

Draft Policy SP12 explains that provision will be made for 8,721 to 9,146 net additional homes for the period 1 April 2022 to 31 March 2039. It is acknowledged that the target figure of 538 dwellings per annum (dpa) does not constitute a ceiling or cap to development. The target figure of 538 dpa is a 5% uplift on the local housing need (LHN), as calculated using the standard method.

In this regard, we note that the Regulation 18 version of the West Berks LPR included a 10% buffer/uplift, but that this has been reduced to 5%, as set out within the Housing Background Paper, to provide a balance between boosting housing supply in the district while considering the limitations and constraints of a largely rural district (paragraph 2.33).

The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district without harm to those constraints. Indeed, none of the key environmental constraints (e.g AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt etc.), but instead will shape the form and direction of growth across the district via the broad spatial strategy. As such, there is no justification to identify such a reduction in housing growth during the plan period on this basis, particularly as there appear to be sufficient sites available in the HELAA to accommodate further growth. As such, it is considered that the level of housing currently proposed is insufficient to support the Government's objective of significantly boosting the supply of housing.

It is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039. This level of housing will ensure sufficient flexibility to deliver the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire.

In respect of housing supply, it is concluded that to be positively prepared and sound, the LPR should be allocating more sites for housing over the plan period and we refer back to the comments above in respect of the settlement hierarchy and the council's approach to allocating new sites for development. It is considered that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy, and noting that many available sites in the 'smaller villages' with a defined settlement boundary have been overlooked contrary to paragraph 79 of the NPPF.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wallis Trustees (Represented by Carter Jonas)
Consultee Full Name	Frank Wallis Estate Trustees
Consultee Organisation	Wallis Trustees
Agent Full Name	Steven Sensecall
Agent Organisation	Carter Jonas
Comment ID	PS1381
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The purpose of the settlement hierarchy is to ensure that new development planned through the Plan period is directed to the more sustainable settlements. Focussing development at the largest settlements and on previously developed sites is supported (Draft Policy SP3 Settlement Hierarchy). However, the majority of the proposed site allocations are on greenfield sites. Furthermore, the West Berkshire Brownfield Register December 2022 update demonstrates that the majority of sites on the register have been redeveloped and only an additional 4 sites have come forward as a result of the recent call for sites process.</p> <p>Additionally, of those few sites on the Brownfield register that have historically benefitted from planning permission, several have let the consent lapse suggesting that the sites are either no longer viable for the proposed redevelopment or are no longer available. It is therefore considered that the reliance on windfall sites to deliver 1,949 dwellings over the plan period is optimistic and that further residential allocations are required to replenish some of the assumed supply from this source.</p> <p>It is also noted that draft Policy SP3 anticipates that Neighbourhood Plans will assist in allocating sites for residential development and that 80 dwellings are anticipated to come forward through this process (draft Policy SP12 Approach to Housing Delivery). However, of the 9 designated neighbourhood plan areas since 2015, slow progress has been made and only 2 have been "made". Of those 9 with designated areas, only 2 neighbourhood plans are proposing to make site allocations for the 80 dwellings. It is therefore concluded that additional sustainably located sites, such as land east of Waller Drive, Newbury, should be allocated for residential development to ensure that the identified housing need is met as there appears to be little appetite for providing additional residential growth through the designated neighbourhood plan areas.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McElhinney, Siobhan (Represented by Woolf Bond Planning)
Consultee Full Name	Miss Siobhan McElhinney
Consultee Organisation	
Agent Full Name	Mr Douglas Bond
Agent Organisation	Woolf Bond Planning
Comment ID	PS1571
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:47:00
Attached Files	PS1571 Woolf Bond (S. McElhinney) LPR Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>We refer to the above consultation event and respond on behalf of our client, Ms S McElhinney who have interests with respect of land located east of Little Lane, Upper Bucklebury. As explained below, land east of Little Lane, Upper Bucklebury should be included in the defined settlement boundary of the village when considered against the Council's criteria for definition (as outlined in appendix 2 of the Draft Submission Plan), including its application elsewhere in the district. The omission of land east of Little Lane, Upper Bucklebury is therefore a clear illustration of inconsistency within the Draft Submission Local Plan and therefore that it is unsound, of the basis of not being justified.</p> <p>National Planning Policy Framework (NPPF) and the Tests of Soundness The NPPF (July 2021) sets out the principal components to be included in local plans. Paragraph 35 requires that in order to be "sound" a Development Plan Document ('DPD') should be positively prepared, justified, effective and consistent with national policy.</p> <p>In order to be justified the DPD must be founded upon a proportionate evidence base and represent an appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the Statement of Common Ground.</p> <p>The positive preparation test requires plans to as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical.</p> <p>For the reasons set out in these submissions there are a number of potential matters that need to be addressed in future iterations of the emerging Plan. These are outlined following the relevant policies and supporting information within the Draft Submission Local Plan.</p> <p>Response to draft Policy SP3 - Settlement Review of settlement hierarchy This policy details the proposed settlement hierarchy alongside the definition of settlement boundaries following the review undertaken by the Council.</p> <p><i>Review of settlement hierarchy</i> Within the existing Plan, Upper Bucklebury is included as a third tier settlement (a service village) which recognizes its size and range of facilities to serve residents within the village and surrounding areas.</p> <p>Through the draft Submission Local Plan, it is proposed to be omitted from settlement hierarchy although it would retain a settlement boundary. Whilst it would retain a settlement boundary, it is proposed to be adjusted from that which currently applies.</p>

On behalf of our clients were object to the reclassification of the village of Upper Bucklebury so that it is outside of the hierarchy detailed in policy SP3 alongside the revision to its settlement boundary. The reasons for this are:

The Council's Settlement Hierarchy Topic Paper (November 2020) outlines the assessment of the district's towns and villages. This includes consideration of the availability of facilities like convenience store, primary school, village hall and public house together with access to employment and public transport services. Whilst this appraisal is noted, the NPPF (paragraph 79) is clear:

" To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."

This therefore emphasizes the importance of considering access to existing facilities which reflects the analysis within the Council's Topic Paper.

Alongside the advice in paragraph 79 of the NPPF, this also highlights the different context with regard to public transport provision in urban and rural areas. This is within paragraph 105 which confirms:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

The approach to settlement hierarchy as outlined in the draft plan is not considered to fully reflect paragraph 105 of the NPPF, as it does not acknowledge the clear differences in public transport services. Whilst the Council's "Settlement Hierarchy Topic Paper" references the need for a sufficiently frequent bus service to justify the classification of villages within the emerging plan. This is however considered to be overly onerous, especially given the changes in lifestyle which arose following the Covid pandemic and the ongoing energy cost challenges following the invasion of Ukraine. This is demonstrated by the very significant increase in home working as confirmed by the results of the 2021 Census compared to that within the 2011 version for the district. This is shown in the table below which indicates over a fivefold increase in the proportion of those who work at or mainly from home. Whilst this may have been influenced by the Government advice on containing the Covid pandemic, it is nevertheless a clear indication that access to public transport is a less significant factor, especially for the ability to work

[See page 3 of attachment 'PS1571 Woolf Bond (S. EcElhinney) LPR Rep' for table comparing 2011 and 2021 Census data]

Furthermore, the Council's approach also discounts the importance that growth within Upper Bucklebury will have in maintaining and enhancing the existing range of services to the residents of the community. The 2021 Census indicates that the core area of the village has a population of 1,036 – this is a very significant level for a location which is not proposed to be included within the Council's settlement hierarchy.

The population of Upper Bucklebury was derived from outputs of the Small Area Statistics for area referenced E00082171 and E00082174 – the combined area of these is shown on the map below

[see page 4 of attachment 'PS1571 Woolf Bond (S McElhinney) LPR Rep '].

With a very significant existing population in Upper Bucklebury (as confirmed by the 2021 Census) and a workforce within the district who can and do work from home, the Council's approach to the reclassification of settlements, especially the village of Upper Bucklebury is unjustified and inconsistent with National Policy.

Upper Bucklebury should therefore be retained as a "Smaller Village" within policy SP3 of the Draft Local Plan.

Furthermore, to provide greater clarity for other settlements where settlement boundaries are defined, this should be included as an additional tier "other village" with confirmation that these are also appropriate for development including infill and affordable exceptions housing.

<Further comments on Review of the settlement boundary can be found under Appendix 2>

Conclusions on Soundness of Draft Policy SP3

As detailed and explained in this response, the current approach in policy SP3 is neither justified nor consistent with national policy. Revisions to the policy are therefore essential.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>In summary it is that the following amendments are made to Policy SP3 together with the proposals map</p>

	<p>1. That Upper Bucklebury is included as a “Service Village” within the policy</p> <p>2. That the other settlements currently not listed in policy SP3 but where settlement boundaries are defined are listed as a four tier – “other village”. That the policy confirms that infilling and other similar developments together with rural exception housing is appropriate</p> <p>Changes to policy SP3 advocated</p> <p>That to address the soundness concerns, the following amendments to the policy are made.</p> <p>1. That Upper Bucklebury is included as a “Service Village” within the policy</p> <p>2. That the other settlements currently not listed in policy SP3 but where settlement boundaries are defined are listed as a four tier – “other village”. That the policy confirms that infilling and other similar developments together with rural exception housing is appropriate.</p> <p>3. That the settlement boundary of Upper Bucklebury is revised to both retain the existing open space east of Little Lane and include the dwellings of Byles Green.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	To clarify the adjustments to policy SP3 of the Local Plan
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1264
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail

Response Date	03/03/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP3 – Settlement Hierarchy is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes

5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1522
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf Croudace Homes Combined Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>[See attached Combined Appendices for appendices. For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>The Spatial Strategy and Settlement Hierarchy (Draft Policies SP1 and SP3)</p> <p>West Berkshire is a highly constrained District. As set out at paragraph 4.6 of the LPR, it contains a number of physical and environmental constraints which influence the location of development including the North Wessex Downs AONB (which covers 74% of the District), substantial areas liable to flooding, the presence of the AWEs at Aldermaston and Burghfield, areas constrained by nutrient neutrality and various other heritage and environmental designations. These are well represented in visual form at Figure 1 of the LPR, which is extracted below at Figure 5.</p> <p>In response to this, the LPR's spatial strategy is set out at draft Policy SP1. One of its key aims is to direct development to areas of lower environmental value.</p> <p>It splits the District into three spatial areas: 'Newbury and Thattham'; 'North Wessex Downs AONB'; and 'Eastern Area'.</p> <p>Newbury and Thattham</p> <p>As set out by Croudace's representations at the Regulation 18 stage (Appendices E, F and G), the decision to direct growth towards Thattham is strongly supported.</p> <p>Although Thattham is one of the 'top tier' sustainable settlements in West Berkshire, it was only allocated very modest levels of growth in the adopted Core Strategy and HSA DPD. The Council justified this at the time on the basis that Thattham had historically seen significant growth and was deemed to require a period of 'consolidation'. Again, the HSA DPD only contained a single allocation in Thattham.</p> <p>When the Core Strategy was examined between November 2010 and May 2012, the Inspector accepted the 'consolidation' strategy for Thattham, but recommended it should be reconsidered as an area for</p>

housing growth in any future review, acknowledging its position at the 'top tier' of the settlement hierarchy. An initial review was taken by the HSA DPD and so the LPR represents the second review since the Core Strategy's adoption in July 2012.

Therefore, by continuing to designate Thatcham as a 'top tier' settlement and by directing growth to the 'Newbury and Thatcham' spatial area, the Council has taken this advice on board. Accordingly, Croudace supports Thatcham's status as a 'top tier' settlement (Urban Area) in draft Policy SP3.

However, Croudace considers that the LPR has not gone far enough, and in order to propose a 'justified' strategy, considers directing additional levels of growth to Thatcham given its status in the hierarchy. This growth could be redistributed either through different allocations to meet the proposed housing requirement identified (538 dpa) or through additional allocations to meet an increased housing requirement which provides additional 'headroom' or uplift in flexibility (for example, takes into account Reading's existing and future needs that remain, or will be, unmet).

Alternatively, Croudace considers that in order to provide greater flexibility to the LPR, the Council should explore an approach which allows development to come forward on sites outside, but immediately adjacent to the settlement boundary, subject to meeting certain criteria. Such an approach may be useful in instances where, for example, there is no 5YHLS and/or the Housing Delivery Test has been failed, or where delivery rates on sites in the housing trajectory drop below a certain level.

In this regard, Croudace would like to highlight an example used by many local authorities, including Fareham Borough Council, where Policy DSP40 (Housing Allocations) and emerging Policy HP4 both support residential development on land outside the urban area where there is no 5YHLS. (Appendices H and I).

In summary, Croudace lends its tentative support to some of the principles established by draft Policies SP1 and SP3. However, it cannot fully support these policies without a mechanism for bringing forward land at Henwick Park for development, whether that be an allocation or other favourable policy.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1773
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The overall settlement hierarchy, set out in draft LPR Policy SP3, also reflects the adopted Core Strategy. This includes continued identification of Burghfield Common, Mortimer and Theale as Rural Service Centres in the second tier of the hierarchy, which is supported. Each of these settlements scored consistently highly in the various stages of the settlement assessment (section 6 of the Settlement Hierarchy Review Topic Paper (November 2020)) and therefore this categorisation is justified and is supported. Table 1 of the LPR describes and emphasises the importance of Rural Service Centres as, ‘Settlements with a good range of key services and opportunities for employment, community and education. They serve a wide catchment area and contain reasonable accessibility and regular public transport provided to a number of destinations.’</p> <p>Parts h to j of Policy SP3 set out the types of development that may be considered appropriate in the Service Villages, including infill development, change of use, non-strategic allocations and rural exception schemes. It is not clear why the provision for ‘other minor development’ has been deleted, which could include appropriate residential / non-residential extensions or alterations for instance, and reference to First Homes exception sites (supported by Policy DM16) has also been omitted.</p> <p>It is noted that the settlement assessment considered only the settlements previously identified in the Core Strategy and Housing Site Allocations DPD (HSA DPD) and does not consider other smaller settlements (paragraph 4.2, Settlement Hierarchy Review Topic Paper (November 2020)). It is also notable that the Settlement Hierarchy Review Topic Paper (November 2020) has not been updated to accompany the current Regulation 19 consultation and therefore any subsequent changes to settlements, or representations to previous Local Plan consultations, have not been fully considered in the current evidence base informing the settlement hierarchy. Whilst the settlement hierarchy helps to inform the appropriate location of development, in order to account for changes to local services and facilities, it is important that the suitability of individual settlements to accommodate development is kept under constant review and that the hierarchy is not applied rigidly.</p> <p>Notwithstanding the above, it is important to ensure that the Settlement Hierarchy set out in Policy SP3 informs the spatial strategy for new development set out in Policy SP1, in order to ensure that the Plan is effective and justified and meets the tests of soundness in NPPF paragraph 35. It is noted that Policy SP3 states ‘The focus of development will follow the District-wide settlement hierarchy’, with Theale, Burghfield Common and Mortimer all identified as ‘Rural Service Centres’ within the Eastern Area. However as set out above, Policy SP1 states only that Theale will be a focus for development in the Eastern Area and includes no reference to the development potential of Burghfield Common and Mortimer.</p> <p>It is noted that the Council has also undertaken a review of settlement boundaries across the District, as set out in the Settlement Boundary Review Background Paper (December 2022) and summarised in the LPR Appendix 3. This has included consideration of settlements without an existing settlement boundary including Englefield.</p> <p>As set out in our previous representations, Englefield village has a range of local community services and facilities including St Mark’s Church, Englefield C of E Primary School, Englefield Stores and Tea Room, Englefield Garden Centre, market garden, social club and children’s nursery and local employment provision.</p> <p>Indeed the size of the village and its level of services and facilities exceeds that of other villages within the District with a settlement boundary. On this basis it is considered appropriate for a settlement boundary to be identified at Englefield to facilitate sustainable development.</p> <p>It is noted that the LPR does not however propose to introduce a settlement boundary at Englefield and it does not appear from the Settlement Boundary Review Background Paper (December 2022) that this has been fully considered. Paragraph 19 explains that ‘The informal nature of most of these settlements and the strong relationship they have as part of the wider rural landscape still means that the introduction of a boundary is still not considered the best way forward’. However, no specific assessment of Englefield is included and it is not therefore clear from this brief conclusion that the criteria for reviewing settlement boundaries (Appendix 1 of the Settlement Boundary Review Background Paper) has been followed.</p> <p>The NPPF (paragraph 79) is clear that local authorities should ‘promote sustainable development in rural areas’ and ‘identify opportunities for villages for villages to grow and thrive’. Accordingly, given the range of services and facilities and relative sustainability of Englefield, it is considered that a settlement boundary should be identified.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>Policy SP3 as currently worded, based on the supporting evidence, does not meet the tests of soundness set out in NPPF paragraph 35. The following changes are thereby recommended in order to ensure the soundness of the Plan:</p> <ul style="list-style-type: none"> • Policy SP3 should be informed by an updated Settlement Hierarchy Review to include consideration of other smaller settlements beyond those currently identified in the Core Strategy and HSA DPD; • Policy SP3 should be used to inform the proposed spatial strategy set out in Policy SP1 to include Theale, Burghfield Common and Mortimer as the focus for development in the Eastern Area; • Policy SP3 should be informed by an updated Settlement Boundary Review to include full assessment of Englefield based on the assessment criteria; and • Parts h to j of Policy SP3 should be amended as follows: <ul style="list-style-type: none"> • “h. Infill or changes of use or other minor development within the settlement boundary; • Non-strategic sites allocated for housing and economic development through other policies in this Plan the LPR or neighbourhood plans; and • Rural exceptions affordable housing schemes; and • First Homes exception schemes.”
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1410
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Some of the settlements have constraints meaning it is not appropriate for them to have non-strategic housing land allocations:</p> <ul style="list-style-type: none"> Burghfield Common and Mortimer are within the Burghfield AWE DEPZ Section 4.35 of the Core Strategy contained the following statement: "The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". <p>Housing construction on this development has not yet commenced, although outline permission has been granted for up to 325 homes and Reserved Matters permission has been granted for part of the site.</p>

	<p>In addition, outline permission has been granted for 104 homes on the adjacent site between The Green and the A340 (LPR site RSA9). These two sites will increase the number of homes in Theale by almost 25% when built out. Therefore, that statement is still valid and Theale still needs that "period of consolidation".</p> <ul style="list-style-type: none"> Theale has outstanding planning permission for 429 dwellings as described above. Any further housing allocations would change the character of the village and over-burden local services, particularly health services. <p>The imposition of the DEPZs around AWE sites mean that housing site allocations can no longer be made at two of the Rural Service Centres: Burghfield Common and Mortimer. This means that other RSCs and Service villages are being asked to take more housing and thus stretching their infrastructure and services.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Point (f) of the policy needs to be qualified to take these constraints into account</p> <p>Modest-sized housing allocations should be made at larger villages (other than RSCs) that have services such as convenience stores, pubs, primary schools, churches, village halls and/or public transport. Such allocations would increase the viability of the services and help such villages become more sustainable.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pincent's Lane (Represented by TOWN)
<p>Consultee Full Name</p>	Pincent's Lane
<p>Consultee Organisation</p>	Pincent's Lane
<p>Agent Full Name</p>	Mike Bodkin
<p>Agent Organisation</p>	TOWN
<p>Comment ID</p>	PS1355
<p>Chapter / Policy / Appendix Number</p>	Policy SP 3
<p>Chapter / Policy / Appendix Title</p>	Settlement Hierarchy
<p>Order</p>	17
<p>Submission Type * E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincents Lane) Full Rep.pdf TOWN (Pincents Lane) App 7.Affordable housing Statement.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>We support the identification of the Eastern Area as an urban area in the same hierarchy level as Newbury and Thatcham. Figure 2 of the plan does not suggest this definition includes only the existing built up urban areas of Tilehurst, Calcot, Purley on Thames as the urban area for the purposes of SP3. The statement in the policy that " the urban areas will be the prime focus for housing and economic development " omits the inclusion of words "to meet the existing needs of these communities".</p> <p>To minimise the need to travel and be consistent with this stated aim, SP3 must explicitly recognise the requirement to accommodate the needs of the eastern area within the eastern area policy. Yet the very limited amount of housing allocations in these areas means that much needed affordable housing in the east will not be accommodated there.</p> <p>For a more detailed discussion of affordable housing need see the representations to policy SP19 below and the Affordable Housing Statement attached as Appendix 7.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Full Rep

	<ul style="list-style-type: none"> Appendix 7 - Tetlow King report: Affordable housing representation
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	<p>The requirement to allocate more sites in the Eastern Area would address many of these challenges to soundness. Whilst it is acknowledged that some constraints do exist, there are sites which are recognised as achievable and deliverable in the Council's evidence base supporting the LPR. Prime amongst these is site TIL13 at Pincent's Lane (see overleaf). Site TIL13 has a long planning history. By common consent, the problems with the 2011 appeal scheme have been resolved and no technical obstacles exist to development of the site for a scheme of up to 165 dwellings. By the LPA's own assessment, the concerns – and the reasons for not proposing it for allocation – are entirely “political”. No one would deny the validity of elected members making political choices where real choices exist, but the fact is that not allocating the site would leave the LPA without a single significant contribution to offer to meet either its own housing need in the Eastern Area or that arising from Reading, of which the Area is functionally part. The site should therefore be allocated.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1292
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS	E-Mail

* Web * Unknown	
Response Date	03/03/2023 13:28:00
Attached Files	PS1298 Opus Works (NCGC & Chartfield) Table 2
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We consider that land at NCGC [<i>Newbury and Crookham Golf Club</i>] is suitable for allocation as a residential site in the LPR, as it lies on the edge of the settlement of Newbury and is adjacent to an existing bus stop on an established bus route (Number 2 and 8 services). As such, the application site, the location of which and proposed site layout is provided within Appendix 1 [<i>see attachment 'Opus Works (NCGC & Chartfield) Appendix 1</i>] to this document, is a suitable and sustainable setting for residential development, according to this policy. Policy SP3 – Settlement Hierarchy is supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	

4. Proposed Changes	Request is made for the land identified for development at NCGC to be included within the revised settlement boundary of Newbury, particularly in light of the significant uplift and long-term retention of a Local Community Facility (Policy DM39) this would enable.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Bell Cornwell LLP))
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Brigid Taylor
Agent Organisation	Bell Cornwell LLP
Comment ID	PS1240
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	PS1240 Bell Cornwell obo Hathor Property attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Site Allocations have been selected and the plan finalised for consultation prior to finalisation of HELAA site assessments; decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development. Public comments invited until 3 March, in the knowledge of proposed meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions

	<p>taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process.</p> <p>Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comments on full assessment of the impact of the proposed development strategy.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>SP3 (Settlement Hierarchy) – Brimpton, where our client's land interest is situated, is classified as one of the smaller settlements (rather than a Service Village, Rural Service Centre or Urban Area). As such, any development outside the settlement boundary would be restricted to that allowed or under policy DM1. No allocations appear to be proposed in these settlements, contrary to the requirement in NPPF para 79 to plan for growth of rural villages. Rather, the villages would rely upon a limited number of infill or change of use/ windfall opportunities as allowed for within the settlement boundary under Policy SP1.</p> <p>The Settlement Hierarchy evidence base document allocated Brimpton 10 points, based on the centre of the village being within 1km of:</p> <ul style="list-style-type: none"> • Primary School (3 points) • Village Hall (3 points) • Superfast Broadband (1 point) • Community Transport Scheme (1 point) • Public House (1 point) • Place of Worship (1 point). <p>No recognition of the local sports facilities appears to have been given. Nor any points for being in close proximity (within 10km) of a Major Urban Centre.</p> <p>The methodology utilised in the Settlement Hierarchy is too heavily focused upon accessibility to public transport – without accounting for modes of active travel (walking, cycling).</p> <p>From Brimpton, it is a short cycle ride to many employment locations/ local services and facilities, including:</p> <ul style="list-style-type: none"> • Midgham Station: 10 minute cycle ride (1.9 miles) • Thatcham Station: 15 min cycle ride (2.7 miles) • Reading: 10 min cycle to Midgham followed by 17 minute commute by rail to Reading.

- Basingstoke: 10 minute (2.2 mile) cycle to Baughurst, then 25 min bus to Basingstoke Hospital/35 to centre/ railway station
- Aldermaston: 13 mins cycle (2.2 miles)
- Greenham Common: 10 min cycle (2.2 miles)
- Newbury: 38 min cycle (7.2miles)

The extensive network of rights of way is shown below. <for map see attachment>

Extract of Definitive Map showing rights of way supporting active travel from the site 40% of the Brimpton population at present is retired, and may therefore be more reliant on the private car than active travel/ cycling for daily needs; Younger working age residents may be more likely to work at home a portion of the week, and commute to work 2-3 days. The ONS has indicated that 84% of workers who had to work from home during the pandemic said they intended to carry out a mix of home working/ working in the office in future[1]. New housing in the village would be attractive to this younger cohort who wish to raise families in a village rather than an urban area – particularly given the presence of a primary school in the village. It is reasonable to assume that such households might have 1-2 occupants travelling to work in Newbury/ Thatcham/ Basingstoke/ Reading 2 or 3 times per week and could comfortably do so via active travel and public transport.

On this basis, we submit that smaller settlements such as Brimpton should be given more priority in the settlement hierarchy, to allow for some small scale development / extension of settlement boundaries so that the village can thrive and grow.

We note that a recent successful proposal for erection of 4 detached dwellings at Washoe Lodge in Brimpton Lane (reference 20/01825/FULD) attracted support from the community. Examples of the positive feedback provided, demonstrating a need for additional housing in the village, include:

“I think this is a great opportunity for the village, and the local primary school. I have young children myself and would be interested in moving my family to a village location like this, which I can still commute to work easily using the local facilities at Midgham/ Thatcham train stations. There is often little opportunity to buy in this village or similar and having the opportunity to buy on a modern development would be ideal for growing families like myself.”

“Nice village, needs more properties for families who commute with some good walks in the local area. Needs more developments with off road parking and garage space as local parking is not great. Would be keen to look at this development in the future once completed.”

“Great to see new development coming to Brimpton, I looked to move to this area recently but did not find any suitable new development.”

“As a local business owner and resident of Brimpton it is great to see more housing for Brimpton. It’s a well located village that seems to be slowly decaying through lack of investment, both the school and village facilities could do with more families in the area to help improve the village.”

Two potential allocations were assessed in the HELAA, these being BRIM1 and BRIM2, further north of our client’s site. (see figure <in attachment>).

Both BRIM1 and BRIM2 were assessed as being adjacent to the settlement, and being greenfield/ agricultural sites available for residential redevelopment. A density of 30dh was considered. The HELAA stage 2b assessment considered whether development of these sites would be appropriate in the context of the existing settlement form, pattern and character of the landscape. For BRIM1 it was noted that “the site is located adjacent to existing linear development on Brimpton Road...some frontage development along Brimpton Road would continue the existing settlement form, however development of the whole site would be inappropriate in the context of the existing settlement form and pattern.” A similar conclusion was reached in respect of BRIM2 – ie that “some frontage development on part of the site” may be acceptable subject to further landscape assessment. For both, the conclusion was that development would be dependent on a review (and realignment) of the settlement boundary. This is because the Stage 2a assessment (development potential) found that Brimpton falls outside the settlement hierarchy and is therefore suitable only for limited infill development within the boundary.

Therefore, the evidence base and early LPR work has shown that:

- There is some Parish Council support for realignment of the settlement boundary to include our client’s site, subject to public consultation and a suitable development proposal. This feedback was provide as part of consultation to the Settlement Boundary review;
- The parish Plan supports proposals for up to 10 additional houses in the village, particularly affordable housing or homes for downsizers;
- The public supported a recent proposal for 4 new homes in the village, demonstrating a need for housing for families and lack of suitable options;
- The HELAA demonstrates that the landscape could accommodate some infill development to the north of the site – a conclusion which must also rationally apply to our client’s site.
- Development on this site would amount to infill, based on the form and arrangement of the settlement. Brimpton Road features linear housing development opposite the site and to the north. This site could accommodate infill development along the road frontage in a manner which is respectful to the form and character of the settlement.
- Development on this site would amount to infill, based on the form and arrangement of the settlement. Brimpton Road features linear housing development opposite the site and to the north. This site could accommodate infill development along the road frontage in a manner which is respectful to the form and character of the settlement.

The only reason, it seems, for not allocating any additional housing in Brimpton, or altering the boundary to provide scope for infill, its rating in the Settlement Hierarchy. We have demonstrated above that the site is accessible by active transport to a number of services, facilities and employment centres. The Settlement Hierarchy review is overly focused upon public transport rather than other sustainable modes of transport, such as active travel (cycling and walking).

	In the Eastern Spatial Area, no sites of less than 1ha have been proposed for allocation for general housing. The NPPF recognises the role that small sites can play in quick delivery of housing and requires that 10% of allocations be of small/ medium size. Given the LPR's reliance on large strategic development locations, we urge the Council to consider including this site within the settlement boundary and/ or allocating it for development in the LPR before submission to Independent Examination.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Allocate small sites less than 1ha in lower tier settlements such as Brimpton, to allow these rural villages to grow and thrive. In particular, allocate our client's site to the west of Brimpton Road, in the centre of Brimpton village which is immediately available for market and/or self and custom build housing to meet the needs identified by the Parish Council. <for map see attachment> Revisit the Settlement Hierarchy report, and decision to only allocate sites in top three tiers of the hierarchy.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1605
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Policy SP3 (Settlement Hierarchy) – Whilst the Council's approach to growth in Rural Service Centres is appropriate and proportionate, detailed scrutiny of the existing allocations is necessary in order to ensure some housing is delivered in these locations. Relying on infill, rural exception schemes and windfall sites will have a detrimental impact on the vitality of these communities – particularly those constrained by AONB.</p> <p>The Council's view on the role and function of villages such as Lambourn, is confirmed by Table 1 which states that Rural Service Centres are: "<i>settlements with a good range of key services and opportunities for employment, community and education. They service a wide catchment area and contain reasonable accessibility and regular public transport provided to a number of destinations</i>".</p> <p>According to the statistics provided within Live Tables by the Department for Levelling up, Housing and Communities, as of 1 April 2021, West Berkshire had a total housing stock of 69,438 units. The 9,146 planned for across the plan period represents a 13% increase across West Berkshire as a whole. Comparably, it would therefore appear inconsistent that a Rural Service Centre such as Lambourn should only be given provision for a 3% increase in its housing stock.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore</p>

	on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1658
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p>Local Plan Review Strategy</p> <p>3.15 Policy SP3 'Settlement Hierarchy' reiterates the focus of development on the settlement hierarchy which takes account of the function and sustainability of settlements across the District and promotes sustainable communities. Specific reference is made to the 'scale of development proposals will be expected to be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility.' Again, the principle of this approach is supported.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1498
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	No

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework.</p> <p>Policy SP3 lists the identified service villages, noting that smaller rural settlements may offer some limited and small scale development potential, appropriate to the character and function of the village, in order to meet local needs.</p> <p>Development is limited to infill or changes of use within settlement boundaries, non-strategic sites allocated for housing and economic development and rural exception affordable housing schemes.</p> <p>Policy SP3 does not provide any reference to the development of previously developed land. The settlement boundary review does not consider previously developed land, which does not reflect the overarching objectives of SP1. The settlement boundary review notes that a landscape led approach has been taken to the drawing of settlement boundaries; which would meet the key objectives (directing development to areas of lower environmental value), however no regard has been given to previously developed land.</p> <p>The settlement boundary review does not reflect the overarching objective of optimising previously developed land. Loose knit arrangements of buildings on the edge of settlements are excluded from settlement boundaries; however these sites could offer opportunities to develop previously developed land which is sustainably located and could deliver landscape enhancements.</p> <p>Furthermore, there is a missed opportunity to enhance the character of settlements through development. Whilst there are specific policies within the plan which seek to protect the landscape, given the settlement boundary review was entirely landscape led, and according to the Council, integral to defining areas suitable to development, Policy SP3 should seek to deliver landscape enhancements through new development within settlements.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We suggest that Policy SP3 is updated with reduced emphasis on arbitrary development boundaries and more emphasis on sustainable development that improves landscape character, optimises opportunities to develop previously developed land and make the best use of suitable land.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne Beaver Properties Ltd (Represented by Nexus Planning)
Consultee Full Name	Pangbourne Beaver Properties Ltd
Consultee Organisation	Pangbourne Beaver Properties Ltd
Agent Full Name	Adam Ross
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1748
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>These representations have been prepared by Nexus Planning on behalf of Pangbourne Beaver Properties Ltd, in response to the West Berkshire Local Plan Review 2022-2039 – Regulation 19 consultation (“the Plan”).</p> <p>We welcome the inclusion of a settlement hierarchy policy in the Local Plan as a way to ensure sustainable patterns of development.</p> <p>We also support the requirement for development in West Berkshire to comply with the spatial strategy set out in Policy SP1, and for the focus of development to follow the district-wide settlement hierarchy, which takes account of the function and sustainability of settlements across the district and promotes sustainable communities.</p> <p>We additionally support the categorisation of settlements as Urban Areas, Rural Service Centres and Service Villages.</p> <p>However, despite the very clear requirements of both Policies SP1 and SP3 for the focus of development in the district to follow the identified settlement hierarchy, and the requirement of Policy SP2 to ensure appropriate and sustainable growth in the North Wessex Downs AONB area, the Local Plan fails to do so.</p> <p>As set out in detail in our representations to Policy SP15, Pangbourne is identified in Policy SP3 as a Rural Service Centre. It is in fact the most sustainable of the four identified Rural Service Centres as it also benefits from a railway station.</p> <p>Notwithstanding this, and despite the clear and wholly logical requirements of Policies SP1 and SP3, Policy SP15 makes no development allocations at Pangbourne, despite its inherent sustainability and the availability of a suitable site (Site PAN8). Instead, a series of allocations is somewhat inexplicably proposed at demonstrably less sustainable Rural Service Centres and also at materially less sustainable Service Villages.</p> <p>This approach results, wholly unnecessarily, in an unsustainable pattern of development which does not have regard to the needs of Pangbourne and which conflicts with the clear and logical strategies identified in Policies SP1, SP2 and SP3 of the Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As set out in more detail in our representations to Policy SP15, the approach to housing provision in the North Wessex AONB area, which makes no provision for development at Pangbourne, is fundamentally unsound and should be reviewed, ensuring that an allocation is made at Pangbourne (Site PAN8) - as the most sustainable location for development in this spatial area.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes

5. Independent Examination	It is important for the Inspector to fully understand the existing flaws with the Plan with specific regard to Pangbourne. This can be best achieved by us presenting oral evidence to the Inspector.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1821
Chapter / Policy / Appendix Number	Policy SP 3
Chapter / Policy / Appendix Title	Settlement Hierarchy
Order	17
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Pangbourne is identified by Proposed Policy SP3 as being a Rural Service Centre (the same designation as is currently has through ADPP1 of the Adopted Core Strategy). This is the second tier of settlements after the main urban areas of Newbury, Thatcham and the Eastern Urban Area. SP3 identifies Rural Service Centres as larger rural settlements offering development potential appropriate to the character and function of the settlement.</p> <p>Pangbourne has a mainline railway station offering direct high speed services to Oxford, Reading and London and has frequent bus services operating into Reading and to other surrounding towns and villages. Within the village centre there is a supermarket, bank, pharmacy, post office, doctors surgery, library, primary school, public houses, dental practices, places of worship, a protected employment area, convenience stores, restaurants and takeaways, and a village hall, as well as a youth / water sports centre, children's play areas and sports grounds.</p> <p>The LPR evidence base includes the settlement boundary review topic paper. Appendix 1 of the topic paper – the audit criteria for services and facilities states that:</p> <p>“A settlement's accessibility to services and facilities is defined by a 1 kilometre radius from the centre of the settlement and for access to railway stations and employment opportunities within 2 kilometres.</p> <p>These distances demonstrate a reasonable commutable walking distance as suggested by the Chartered Institution of Highways and Transportation (Providing for Journeys on Foot 2000)”</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	ONR Land Use Planning
Consultee Full Name	Vicki Enstone
Consultee Organisation	ONR Land Use Planning
Agent Full Name	
Agent Organisation	
Comment ID	PS62
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/01/2023 14:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Please note that ONR's land use planning processes published at http://www.onr.org.uk/land-use-planning.htm may apply to some of the developments within the West Berkshire Local Plan Review 2022-2039.</p> <p>If you are a Local Authority or neighbourhood with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require:</p> <ul style="list-style-type: none"> • confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and • that the developments do not pose an external hazard to the site.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Charlesgate Homes Limited
<p>Consultee Full Name</p>	Mr Joe Atkinson
<p>Consultee Organisation</p>	Charlesgate Homes Limited
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS142
<p>Chapter / Policy / Appendix Number</p>	Policy SP 4
<p>Chapter / Policy / Appendix Title</p>	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield

Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 14:05:00
Attached Files	Charlesgate Homes response to AWE depz zone.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>This response to proposed policy SP4 is on behalf of Charlesgate Homes Limited who are promoting land in Sulhamstead for housing allocation for self and Custom build housing (SUL1)</p> <p>This proposed policy appears to suggest that the starting position for all planning applications is a no, which is clearly in conflict with the NPPF goals which is that there should be a presumption in favour for all new developments. It is understandable that there will need to control on development in this area so as to not cause a detrimental impact on a facility that aids national security.</p> <p>It is advised that throughout this proposed local plan review that currently any land within the AWE DPEZ zone in the Burghfield and Aldermaston will not be considered for ANY additional housing due to the WBC emergency planners advising that NO additional dwellings can be accommodated within the WBC emergency plan.</p>

	<p>There does not appear to have been any site assessment done on any of the sites that are being promoted in the emerging local plan, and looking at the updated HELLA document, any site within the out of date DPEZ zone has been immediately omitted without any further site by site assessment, and would suggest that WBC are seeking a moratorium on any additional houses or businesses within this DPEZ</p> <p>Charlesgate Homes Limited has instructed Mr Keith Pearce from Katmal limited to not only undertake a site assessment on SUL1 (land at Benhams Farm, Hollybush lane) but has also undertaken a risk assessment on the AWE burghfield site and its activities as well undertaking an assessment of the current DPEZ and policy SP4.</p> <p>This site assessment and assessment of the Burghfield AWE and the current DPEZ have been attached in appendix 1 [see attachment] which is entitled "AWE Burghfield emergency planning implications for a proposed development at Benham's Farm, Hollybush Lane, Burghfield Common, Reading RG7 3JS." Which is site SUL1 in the WBC HELLA report on promoted sites for residential housing</p> <p>This report is extremely detailed, but Mr Pearce has provided a summary to his findings in support of SUL1 as a site for residential development which is currently within the DPEZ;</p> <ol style="list-style-type: none"> 1 The proposed development site is outside the UPAZ where prompt protective actions (in this case shelter) are estimated to be able to provide a nett benefit if the postulated accident occurred on the AWE Burghfield site while the wind was blowing towards the proposed development site under relatively unlikely weather conditions. Therefore, no detailed emergency plan is required to enable urgent protective actions at this site. 2 The potential radiation dose to people living on the proposed development are so low and the probability of any such event affecting the site so low that we can assert with confidence that the AWE Burghfield site does not pose a significant risk to those who might live in the development. 3 The dose rates at the proposed development site during and after the postulated event would be sufficiently low as to allow life as normal, including home visits by emergency services and in-home service providers. 4 There are a number of sensible options to redefine the DEPZ such that the development site would be outside it. This would remove all the REPPIR-19 emergency planning requirements except those associated with severe accidents and outline planning. 5 The AWE Burghfield site will not be affected by external hazards resulting from a residential development this far away 6 The development will not affect the ability of the emergency services or others to gain access to, or egress from the site and so will have no impact on the ability to respond any event on the AWE Burghfield site. 7 This proposal does not raise serious safety concerns nor does it lead to a breach the ONR demographic criteria. 8 It is concluded that the proposal would not present a barrier to the ability of emergency services to safely carry out their duties, and nor would it affect the Council's ability to execute and manage its obligations under the REPPIR plan 9 Given the above, the local authority can provide the ONR with "adequate assurance that the proposed development can be accommodated within their existing off-site emergency planning arrangements (or an amended version)" allowing the ONR to approve the development. <p>The SP4 policy appears to not take a "each site considered on its own merits" and hugely constraints all additional net housing in this location and is therefore at odds with the NPPF which supports the delivery of sustainable development, especially being that Burghfield Common is a Rural service centre and a good location for much needed residential housing.</p> <p><i>Attachment: Response to AWE DEPZ zone.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The SP4 policies that limit development are not justified and not supported by evidence submitted by nuclear experts.</p> <p>The suggestion that the starting point for all applications submitted is a 'NO' goes against the NPPF policy to support sustainable development and there should be a presumption in favour of development, especially when the expert witness statement attached highlights the flaws in trying to enforce a housing monitorium in the DEPZ.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>the sole reason for SUL1 (benhams farm) not being allocated is based on the fact that the DEPZ has increased in size, but not to the RIPPAR 19 standards, and it maybe that we will need to rely on the expert Witness Dr Keith Pearce to support the statement attached.</p>
<p>6. Notification of Progress of the Local Plan Review - The</p>	<p>Yes</p>

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Aldermaston Parish Council
Consultee Full Name	Aldermaston Parish Council
Consultee Organisation	Aldermaston Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS430
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 15:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Aldermaston Parish Council (APC) reviewed WBC's draft Local Plan when it met on 14th February 2023, and wish to make the following observations.</p> <p>Under the current plan the advice is that AWE/Emergency Planning will likely advise against new residential development in the DEPZ.</p> <p>Policy SP4 now states that AWE/ONR/Emergency Planning will likely advise against development that could lead to an increase in residential or non-residential populations within the DEPZ. Aldermaston Parish Council has long argued that WBC should maintain a low-density of people around AWE in the interest of public safety, and have been particularly concerned that Emergency Planning does not have a record of approximate worker numbers in the area (we believe the number of workers travelling into our Parish greatly exceeds the number of residents living in the Parish) . It is therefore our view that Emergency Planning could not reasonably assess whether any new commercial developments could have been safely accommodated within the Off-Site Emergency Plan. We have also recognised that AWE require that external access routes (such as the A340) are kept clear to allow emergency responders to be able to deal with any situation that arises.</p> <p>The minutes from the AWE Local Liaison Committee meeting in November 2022 state: "AWE's position now is that it is very likely to object to any development inside the DEPZ which will increase the numbers of people or present a hazard or potential constraint on AWE. We are developing a process to make sure that we get to know all the planning applications and pre-apps which are coming into West Berkshire and the other local authorities. However, even if AWE/MoD does object, that doesn't mean that a planning application won't be granted. However, if we object along with WBC Emergency Planning and ONR then this is very possible the planning application will be refused."</p> <p>Aldermaston Parish Council requests that WBC Planning and Enforcement Officers are made fully aware of AWE's revised position, and that any persons seeking advice from the Duty Planning Officer is given clear warning that development opportunity within the DEPZ is severely limited and that past approvals should not be seen as an indication that future consents can be achieved.</p> <p>Apart from the above comments, Aldermaston Parish Council is supportive of the proposed Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS531
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:25:22
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Reading Borough Council supports the approach of policy SP4. The Detailed Emergency Planning Zone for AWE Burghfield crosses the boundary of West Berkshire and Reading, and RBC commits to continue joint working with WBDC to consider the implications of any development in the area on the off-site emergency plan.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Allum, Jason
<p>Consultee Full Name</p>	Jason Allum
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS461
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 10:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	On 22nd May 2019, the Government introduced REPPiR 19 to strengthen the national emergency preparedness and response arrangements for radiological emergencies. The new legislation replaced the Radiation (Emergency Preparedness and Public Information) Regulations 2001. All 36 UK nuclear sites working with 'ionising radiation' (as defined by the legislation) have one year to comply in full by 21st May 2020. The AWE Detailed Emergency Planning Zone (12th March 2020) set out and defined

	<p>the Outline Planning Zone (OPZ) for Aldermaston area as 15 km. WBC issued the emerging draft LPR in December 2020, under policy SP.4 section and the Outline Consultation Zone (OCZ) for Aldermaston is set at 8 km. The AWE Emergency Plan states:</p> <p>What is important and pertinent to our findings is that for both sites there has been no change in activity, safety or risk, but a change in criteria required to evaluate the risks against. The differences between the two sites with respect to the scale of change relates to what materials are on each site, the amounts involved and what processes are undertaken at each of the sites.</p> <p>Following and instruction from the ONR this was reduced to 5km. If the above is correct then why a reduction in the zone? furthermore, the OPZ has also been reduced from 15 km to 12 km.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	I conclude that I will be prepared to give evidence at a public enquiry and clarify any details arising from the above.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	de Lara, John
<p>Consultee Full Name</p>	John De Lara
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS376
<p>Chapter / Policy / Appendix Number</p>	Policy SP 4
<p>Chapter / Policy / Appendix Title</p>	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
<p>Order</p>	20
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	26/02/2023 10:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Consultation with ONR: Reading the local plan review WBC clearly have failed to consult with the ONR, as they should have as the development is >500 homes and within 12KM of AWE Aldermaston. In SP4, there are lots of words but nothing to say that WBC have done anything more than read the ONR website (sections are cut and paste from the ONR). Clearly there is a massive impact to the population profile and rather than read a website, I would have expected WBC to have consulted with the ONR. This clearly reinforces that WBC have rushed LPR 19 and not consulted with one statutory body, how many other statutory bodies have not been consulted with? I believe that this lack of consultation demonstrates that WBC have rushed this consultation and hence it is unsound.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1208
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:42:00
Attached Files	Pro Vision OBO TA Fisher Appendix A
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	No

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Our client has an agreement with the landowners of the site, known as 'Land to the rear of The Hollies' in the District, which currently forms part of an allocated site for approximately 60 dwellings under Policy HSA16 in the adopted Housing Site Allocations Development Plan Document (HSADPD) (May 2017).</p> <p>It is understood the 'emerging draft' Local Plan Review (LPR) no longer seeks to carry this allocation forward. This is despite part of the allocated site having already been built out and now occupied by residents. The Council say this is because the site now falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. The DEPZ was extended as a result of the updated Radiation (Emergency Preparedness and Public Information) Regulations (REPPPIR) 2019.</p> <p>Our client does not support the removal of this allocated site from the Development Plan. Our client is keen to work collaboratively with the Council to secure the development of the remaining part of this currently allocated site. These representations therefore focus on responding to the removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield.</p> <p>These representations also seek to respond to the Council's development strategy (including Policies SP1 and SP3, SP12 and SP14) and decision-making in relation to an effective 'moratorium' on new development within Burghfield Common, despite the village remaining as a 'Rural Service Settlement', which offers 'development potential appropriate to the character and function of the settlement', according to the proposed Spatial Strategy.</p> <p>These representations also discuss Policy RSA12, which seeks the provision of approximately 100 dwellings within Burghfield Common1, within the extended DEPZ.</p> <p>In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021) paragraph 35. This identifies that a sound Plan is:</p> <p>a) Positively Prepared – 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development';</p> <p>b) Justified – 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence';</p> <p>c) Effective – 'deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground'; and</p> <p>d) Consistent with National Policy – 'enabling the delivery of sustainable development in accordance with the policies in this Framework'.</p> <p>It is in light of these criteria that the LPR (Regulation 19) version has been considered. We find the de-allocation of site HSA16 is not consistent with the Council's approach to its development strategy and the settlement hierarchy. In addition, its approach towards a 'moratorium' on further development within the parish of Burghfield Common is flawed.</p>

Policy SP4 – AWE Aldermaston and AWE Burghfield

With reference to Policy SP4 of the LPR, it is noted the site falls within the Atomic Weapons Establishment (AWE) Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield, as identified by the maps in Appendix 3 of the Plan.

Policy SP4 explains that *“in the interests of public safety, and to ensure that any proposed developments do not pose an external hazard to the AWE sites, any new development... located in the Detailed Emergency Planning Zone (DEPZ) of... AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) and/or Ministry of Defence (MoD) have advised against that development and/or objection”*.

Within the DEPZ, the ONR is to be consulted on applications for *“any new development, re-use or re-classification of an existing development that could lead to an increase in residential... populations thus impacting on the off-site emergency plan”*.

We consider that as the site was allocated in the 2017 HSADPD and that only part of the allocation has been completed to date the site's development is in accordance with the allocation policy and can be accommodated without compromising the safe functioning of AWE Burghfield, public safety or impacting adversely on the function of the Emergency Plan.

Therefore, the principle of development remains plainly acceptable.

Prior to the submission of application 22/00244/FULEXT, correspondence with the Council's Principal Planning Officer on 14 January 2021 identified that:

“Our position is that the HSA DPD allocation remains in the Local Plan, so the principle of development is established. You will probably have seen our current consultation on the emerging Local Plan Review which proposes rolling forwards this [Policy HSA16] allocation”.

This provided confidence to our client to proceed with an application on the site for the remaining balance of 32 dwellings of the allocated 60 dwellings.

Following the refusal of 22/00244/FULEXT, our client submitted a request for Pre-application Advice (22/02010/PREAPP). Part of the Council's response was to indicate that from a planning policy perspective, 'senior officers' at the Council now considered there to be a 'moratorium' on all new development in the DEPZ in West Berkshire. However, we consider this was not, or never was, the intention of the DEPZ.

The updated REPPiR Regulations (2019) resulted in the extension of the DEPZ around AWE Burghfield to include the settlement of Burghfield Common. However, this has not prevented the delivery of development within the DEPZ. Indeed, the Annual Monitoring Report (AMR) (January 2023) shows at Table 3.7 that Phase 1 of Policy HSA16 was completed in 2021/2022, whilst Table 3.20 identifies there is an outstanding commitment for 114 dwellings within the DEPZ at Burghfield.

Further, Paragraph 3.34 of the AMR states that *“Due to the introduction of the new [REPPiR] that came into force in 2019, it extended the existing AWE land use planning consultation zone known as the DEPZ (Detailed Emergency Planning Zone). From 2020/21 onwards any development within the DEPZ will therefore be **monitored**”* (our emphasis).

The AMR is a significant and material consideration relating to the principle of development on this site. If the Council intended to prevent any further development in the DEPZ, then the AMR, published after the decision on application 22/00244/FULEXT was made, would have removed the site from Table 3.7 (Local Plan Housing Sites progress). It has not. In addition, the Council state that development within the DEPZ will be “monitored”. This is entirely different from placing a 'moratorium' on all development in the DEPZ. There is clearly therefore an inconsistency between the Local Plan evidence base and Appendix 7 of the LPA – the evidence base does not support the exclusion of this site from allocation in the LPR nor does it support that this site “is not deliverable at this time”. As above, the LPR is therefore unjustified on this basis.

The REPPiR-19 Regulations require the Council to prepare an off-site Emergency Plan to cover the DEPZ and to review and update the plan as necessary. It became clear at a Pre-application meeting held in October 2022 that a 'line in the sand' was drawn by the Council's Emergency Planning Officer, who personally decided that sites with outline planning permission should be included in the Emergency Plan's provisions and to exclude sites that were allocated for development. This personal view clearly does not take account of the definition of deliverable in the Framework.

The purpose of an allocated site is to establish the principle that a suitable form of development can be located on a particular site. Allocated sites should therefore automatically be included within the provisions of an Emergency Plan, regardless of whether they have achieved planning permission or not. The Emergency Planning Officer's decision was not based on any satisfactory legislative rationale or guidance, but on a personal judgement. It remains unclear as to why the provision of a further 32 dwellings on the remainder of the allocated site could not be accommodated in the Emergency Plan when the REPPiR Regulations accept that such plans will need to be amended to reflect changes over time. Indeed the original emergency plan has had to be updated to include the whole settlement of Burghfield and Burghfield Common as well as other settlements in Wokingham District, Basingstoke and Deane Borough and development on the edge of Reading. Therefore in 2019 the plan had to have a significant update and the Council has failed to provide any evidential reasoning as to why it could not accommodate this single allocated site but could accommodate all others.

At the time of preparation of the Regulation 18 draft Local Plan there had been no increase in risk at AWE Burghfield in the AWE Detailed Emergency Planning Zone Report dated 4 March 2020, prepared by the Council's Emergency Planning Officer for Members of West Berkshire Council. The Report stated in Section 3, under the heading 'Risk Management' that *“It is important to note that there are **no changes in activity on the AWE sites, and there is no greater risk to the public than before this legislation was introduced**”* (our emphasis). This is repeated in the conclusion at paragraph 7.1. Subsequently, a further *“declaration of no change”* for AWE Burghfield was issued in November 2022. Therefore, the 'risk' of an incident occurring has not increased and so development should not be restricted in the updated DEPZ. In the updated report prepared by the Council in January 2023, similarly it is stated that

there is no change in activity at AWE and no greater risk to the public. The change in the planning policy position in respect of this site between the Reg 18 consultation and this Reg 19 consultation is therefore not explained or evidence based.

Nevertheless, and importantly, the Regulations and the Guidance do not preclude development within the DEPZ. They do not state that development should be prevented from coming forward just because it is in the DEPZ. On the contrary, REPPiR-19 Regulations recognise that the population within the DEPZ will naturally change within the life of the emergency plan hence why Regulation 12 of REPPiR-19 Regulations require the Council to, at intervals not exceeding three years, review and revise the emergency plan.

The Regulations also envisage that development will come forward within the DEPZ, and there are many passages in the Guidance which acknowledge that development will take place in the DEPZ, particularly paragraph 250: *"In order to understand if a change in the local area necessitates a re-determination [of the DEPZ], the local authority should consider developments within or adjacent to the detailed emergency planning zone taking into account their potential impact on the effectiveness of the emergency plan"*.

As such, it is only the Council's role to *consider* whether proposed development can be accommodated within the off-site Emergency Plan, not to treat the DEPZ as an absolute constraint onto any development. The REPPiR-19 Regulations clearly do not support the Council's 'moratorium' on development in the DEPZ. Furthermore, in respect of the offsite Emergency Plan, paragraph 13 of the appeal decision at Boundary Hall, Tadley in 2011, confirms the Secretary of State's conclusion that *"that the Off Site Plan is designed to be **flexible and extendable** and that, while it is possible that the implementation of the application scheme would necessitate changes to the Plan, **the evidence does not lead to the conclusion that the Plan would fail**"* (our emphasis).

We are also aware of a recent (31 January 2023) Appeal Decision in Wokingham concerning a proposed residential development at Three Mile Cross. That appeal was allowed by PINS (**Appendix A**) with the Inspector accepting that:

[See attached document for ProVision obo Fisher & Sons Appendix A for Appendix A]

- the risk to a person being harmed by an incident at AWE Burghfield was one in many thousands or millions of years. The risk to public safety was therefore very low. (Para 12)
- if an incident were to occur, a person not sheltering (i.e. a person exposed to radiation from the plume) would receive a radiation dose less than the average annual dose received by residents in Cornwall. (Para 18)
- the proposal would not present a barrier to the ability of blue light services to safely carry out their duties, nor would it affect the Council's ability to execute and manage its obligations under the REPPiR Plan. (Para 22)

Whilst we appreciate that decision was not available at the time the Council published this LPR for consultation, it does serve to highlight that residential development in the DEPZ can be allowed and therefore further supports the case for carrying forward the allocation of this site into the LPR.

In summary, we consider that the Council's strategy for Burghfield is simply not justified or informed by the evidence, and that the Council's misguided approach to the role of the REPPiR- 19 Regulations has significant repercussions to the delivery of an allocated housing site and the objective of achieving sustainable development in this village.

Given the starting point for development should be a presumption in favour of sustainable development (NPPF Paragraph 10), we do not consider that Policy SP4 (particularly in reference to development likely being refused) is positively prepared. In addition, we consider the de-allocation of the site from the LPR on the grounds of it being within the extended DEPZ and its perceived impact on the function of the Emergency Plan is fundamentally incorrect. The LPR is therefore not sound and should not proceed to Examination.

Conclusion

These representations have been prepared by Pro Vision on behalf of our client, T A Fisher & Sons, in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039 (Regulation 19) (January 2023).

Our client has an agreement with the landowners of the site known as 'Land to the rear of The Hollies' in the District, which currently forms part of allocated site 'HSA16', in the adopted HSADPD (May 2017).

We note the allocation for the site is no longer included within the 'emerging draft' LPR, as the site falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield, despite there being a remainder of 32 units still to be delivered.

Our client **does not** support the removal of this allocated site from the LPR.

	<p>These representations have therefore focused on responding to the unjustified removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield as well as the development strategy and spatial hierarchy proposed by the LPR.</p> <p>In particular, we consider the remaining number of dwellings should be carried forwards in the LPR as the development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.</p> <p><i>(attachment)</i></p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the removal of the allocated site known as 'Land to the rear of The Hollies, Burghfield Common' and the inconsistencies in the spatial strategy, particularly towards development within the DEPZ, are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS865
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>It is acknowledged that the DEPZ for AWE Burghfield was extended in 2020 and is now a greater constraint to future development in the Eastern Area. However, it is important to note that some recent development in the DEPZ has been considered to be appropriate. In January 2023, as referred to above, an Inspector allowed a residential development of 49 units within the DEPZ at Three Mile Cross (within Wokingham borough) (ref. 3304042), where he concluded based on detailed examination that there was a 'very small' risk of an incident and that 'there would be no harm with regard to the proximity of the AWE Burghfield site.' Whilst the potential hazards of the AWE sites are recognised, it remains important that a positive approach is taken to considered development proposals in line with NPPF paragraph 38, in order to ensure that suitable sustainable development can be accommodated where possible.</p> <p>Supporting paragraph 4.61 explains that, "During the plan period there may also be changes to the DEPZ as a result of the requirement under REPPPIR legislation to undertake formal reviews of the DEPZ at least on a 3 yearly basis or because of a material change in work with ionizing radiation. This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review."</p>

	<p>It is noted that the DEPZ for both AWE sites was recently reviewed in January 2023 and has already resulted in minor changes to the DEPZ for AWE Burghfield, which need to be reflected in Appendix 3 of the LPR.</p> <p>As set out in our previous representations, the potential for changes to the DEPZ is of major importance given the development potential of land currently located within the DEPZ, including for example land of strategic importance at Grazeley. We would therefore strongly support the need to maintain ongoing review throughout the plan period, as referred to at supporting paragraph 4.61. Should the DEPZ change, this should be a trigger for a review of the LPR and reconsideration of appropriate sites for residential development, such as at the Estate's land at Grazeley, Burghfield Common and Green Park.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>The following changes are thereby recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:</p> <ul style="list-style-type: none"> During the plan period there may be changes in the inputs to the ONR's process which may result in consequential changes to the consultation zones or criteria. These will be kept under review. During the plan period there may also be changes to the DEPZ as a result of the requirement under REPPiR legislation to undertake formal reviews of the DEPZ at least on a 3 yearly basis or because of a material change in work with ionizing radiation. This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review. Should there be a significant redrawing of the boundary of the DEPZ during the Plan period a full review of the Local Plan will be undertaken.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1199

Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	AWE welcomes reference in the Policy to the Detailed Emergency Planning Zone (DEPZ) by way of an update to Policy CS 8 of the West Berkshire Core Strategy (2006 - 2026) to the regime of consultation AWE supports the policy and footnote 10 which recognises that the DEPZ criteria may change over time and it is the Council's intention to follow the latest ONR guidance which may change from time to time.

	<p>Policy SP4 recognises the land use implications of the two licenced nuclear installations at AWE A and AWE B, for future development in the area. Policy SP4 also recognises the need to consult ONR, as a body with sufficient technical experience, to advise on future land use compatibility issues and risks.</p> <p><i>Para 4.67</i></p> <p>AWE welcomes the flexibility afforded by this paragraph to any changes in the inputs to the ONR's process.</p> <p><i>Para 5.68</i></p> <p>AWE welcomes the flexibility to the application of Policy SP4 in the event the DEPZ is amended under the REPPIR legislation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>We note that the interactive mapping available via the Council's website does not currently show the OCZ or wider 12km consultation zone. It is assumed that this will be rectified in line with the policy once adopted.</p> <p><i>Para 4.37</i></p> <p>In accordance with the representation made against Para 12.12, whilst not going to the root of compliance or soundness AWE is seeking some alignment across the plan as to how the function of the sites is explained.</p> <p>Para should read</p> <p>"Both AWE sites as <u>Government research and defence establishments</u> are core to sustaining the UK gGovernment's nuclear deterrent and support national defence and security and in particular the delivery of the warhead contribution to the national and international nuclear deterrent"</p> <p><i>Para 4.40</i></p> <p>Paragraph incorrectly refs para 95 of the NPPF, not 97, correction required.</p> <p><i>Para 4.56</i></p> <p>The word 'normally' should be removed, and the supporting text should set out very clearly the circumstances in which the Council will not follow the ONR's advice.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gleeson Strategic Land Ltd
Consultee Full Name	Mr Peter Rawlinson
Consultee Organisation	Gleeson Strategic Land Ltd

Agent Full Name	
Agent Organisation	
Comment ID	PS1119
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

Please give reasons for your answer

The policy explains that in the interests of public safety, and to ensure that any new developments do not pose an external hazard to the AWE sites, residential development (among others) located in the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) and/or Ministry of Defence (MoD) (or their agents) have advised against that development and/or object. The Plan clarifies that the ONR will be consulted on, 'any new development, re-use or re-classification of an existing development that could lead to an increase in residential or non-residential populations thus impacting on the off-site emergency plan'.

Footnote 11 in relation to the consultation criteria notes that these criteria may change over time and that Policy SP4 reflects the Council's intention to follow the latest ONR guidance from time to time. Gleeson supports the Council following the ONR advice as and when it may change. Paragraph 4.61 sets out that under the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR) legislation a formal review of the DEPZ is required on at least a 3 yearly basis, or if there is a material change in work with ionizing radiation. 'This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review.'

Should the area covered by the DEPZ change as a result of new modelling, or if the advice of the ONR changes, then it is considered that the Council's approach to new development within the currently affected areas should also change.

The Plan sets out that the ONR advice on a particular development will be influenced in part by whether or not they receive adequate assurance from the owner of the Off-Site Emergency Plan (the Council) that the development can be accommodated within that Plan. If it is considered that the AWE Off-Site Emergency Plan would be adversely affected with no viable and sustainable mitigation options public health would not be protected and then the West Berkshire District Council Emergency Planning Service would submit evidence against the development to the local planning authority. The ONR will also provide advice for developments that potentially pose an external hazard to the AWE sites.

The newly inserted text at paragraphs 4.57 to 4.61 further explain that 'given the potentially cumulative effects of any population increasing surrounding the AWE sites, it will be necessary to monitor committed and future approved but not built development in partnership with neighbouring councils. The Councils will monitor housing completions and commitments as part of the Annual Monitoring Report and send this information directly to the Emergency Planning Services in each council and the ONR for them to make informed judgements when assessing future development proposals.' This suggests that rather than all new residential development within the DEPZ being unacceptable, the acceptability of new development will depend on the capabilities of the Emergency Planning Services to respond to populations in the DEPZ. The capabilities of the Emergency Planning Services may change over time and if the capability of the Emergency Services improves then consideration should be given to whether any new residential development could come forward at Burghfield Common, without unduly affecting the off-site emergency plan for AWE Burghfield. If this potential does arise allocations should be made for residential development at Burghfield Common to support its important role as a Rural Service Centre. The Council should work alongside the emergency services to improve their capability to better respond to any off-site emergency arising from AWE Burghfield. The goal should be for additional response capacity that would enable a suitable amount of development to come forward to support the continued role of Burghfield Common as a Rural Service Centre. If future development within the DEPZ is completely curtailed this will have negative impacts on the existing population and stifle sustainable development.

Paragraph 6.35 states that 'If in the future the DEPZ is reviewed and the emergency planning arrangements be amended, then future reviews of the Local Plan will consider whether strategic allocations in the area would be suitable.' This provision is supported and it is considered that should a material change occur during the plan period to the DEPZ then a review of the plan should be commenced at the earliest opportunity. The Plan could be affected if the DEPZ expands or contracts. If the DEPZ expands it may encompass sites allocated for development. If these sites consequently become unviable there would be a negative effect on the Council's housing land supply and housing delivery that will need to be rectified. Alternatively if the DEPZ is reduced in size this may result in land previously within the zone becoming unrestricted and therefore potentially suitable for sustainable development. The Plan still recognises that Burghfield Common as a Rural Service Centre is a sustainable settlement, despite it now being wholly within the restrictions of the DEPZ. New development in sustainable locations has been proven to bring numerous social, economic and environmental benefits and if the DEPZ changes it is also considered that an early review of the Local Plan should be commenced at the earliest opportunity to enable the consideration and allocation of land that may then be outside of the DEPZ for development.

To summarise the above points, Gleeson Land supports the overall intentions of the Local Plan Review to deliver sustainable development for the district, the settlement hierarchy and the spatial strategy. However, it is considered that there should be a requirement for an earlier review of the Local Plan should any changes arise in the AWE Burghfield and AWE Aldermaston DEPZ's or the capabilities of the Emergency Planning Services that may change the acceptability of new residential development in areas currently covered by the DEPZ. In addition the housing target should be more clearly defined at the upper end of the given range. It should be clear throughout the whole Plan that the housing target is for 9,146 dwellings (538dpa), plus the 230 dwellings of unmet need from Reading Borough Council. This unmet need should be provided for in new site allocations now, rather than being left for a later review. Serious consideration should also be given to increasing the overall housing target further to support the delivery of more affordable homes given the very high need for such homes

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
* Yes

No

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1587
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 16:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*Late Response* Page 26 There is a conflict between the "Development within the Land Use Planning Consultation Zones: Office for Nuclear Regulation" DEPZ and Policy SP14 - Sites allocated for residential development in Eastern Area (Page 58) where SP14 has an additional 60 dwellings allocated (RSA19/HSA16) with zero likelihood of those 60 dwellings being granted planning permission. Should they not be removed from the pakn as undeliverable(?)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS782
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	No

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP4 AWE Aldermaston & Burghfield</p> <p>No Comment as I hope the Plan will attempt to match Jobs with appropriate Housing.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hope and Clay Construction Ltd (Represented by Pro Vision)
<p>Consultee Full Name</p>	Hope and Clay Construction Ltd
<p>Consultee Organisation</p>	Hope and Clay Construction Ltd
<p>Agent Full Name</p>	Sarah Pyne

Agent Organisation	Pro Vision
Comment ID	PS1579
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:21:00
Attached Files	ProVision (Hope and Clay Construction)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>[See attached for Appendix A]</i> <u>Background</u>

Hope & Clay Construction Ltd are located to the north of the existing Easter Park site, which comprises a variety of employment uses including office (Class E(g)) (formerly B1), light industrial (Class B2) and warehouses (Class B8), as well as sui generis uses for vehicle repair and MOT. Prior to the development of the business park, the site, formed part of a saw mill and charcoal works. To the east of the site lies managed woodland and the Pinelands caravan park, whilst to the north, approximately 90 metres from the site are a line of residential dwellings along Padworth Common. To the north-west of the site is AWE Aldermaston, a nuclear research site.

Construction of the new Hope & Clay offices and warehouse finished in 2022 following approval by the Council in September 2014 for 1907 sqm of warehouse (B8) building and associated offices (B1a) for the storage of construction machinery and plant with associated access, parking and landscaping (ref. 14/01037/COMIND). At the time of approval, the council's Economic Development Officer considered that *"If Hope and Clay Ltd are able to consolidate onto one site, it is very likely that the business will be able to grow and develop further, employing more people and contributing to the local supply chain."*

Despite the site's long standing and existing use as an employment site, Easter Park is located in land outside of the defined settlement boundary and is not recognised within the adopted local plan as a Protected Employment Area as listed at Appendix G of the adopted Core Strategy. Currently, the adopted policy position for development at Easter Park is set out at Policy CS9 of the Core Strategy which states that, with regard to proposals outside of defined employment areas it states proposals for business/B8 uses will be assessed against compatibility with uses in the area surrounding the proposal and capacity and impact on the road network.

The Core Strategy Paragraph 5.46 also identifies a shortfall of B8 floorspace of approximately 24,000sqm in the district and a significant shortfall of 121,000 sqm of office space.

Housing and Economic Land Availability Assessment (HELAA) February 2020

Land adjacent to Easter Park ('Land off Benyon Road, Easter Park, Tadley') has been promoted for Employment (B1, B2 and B8) uses with an identified capacity of 8,400 sqm of floorspace. The assessment of the site was first set out within the Housing and Economic Land Availability Assessment (HELAA) in February 2020 (HELAA ref. ALD6).

Consistent with the methodology, the site was not automatically excluded from the site assessment at Stage 1b despite its noted location within the inner Atomic Weapons Establishment (AWE) Aldermaston planning consultation zone, with the document noting that *"Whilst the HELAA methodology identifies notified safety zones as an automatic exclusion criteria, it also states that the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. This assessment will be undertaken in stage 2 of the HELAA."*

At Stage 2, the site's location adjacent to an existing employment (industrial) area was noted, as was the fact that this industrial estate is not a Protected Employment Area. Stage 2 concluded with: *"The proposed commercial use would have to be considered carefully with respect to management and control in an emergency due to its proximity to the AWE. Site is adjacent to an existing employment area, and so allocation would be dependent on a review of the District's employment needs through the Local Plan Review. Further information required on a number of matters, including highways and ecology, before a robust decision can be made." It was identified as being available, achievable and "potentially developable in part".*

Local Plan Review 2020-2037 Emerging Draft December 2020

In December 2020 the council published their Local Plan Review 2020-2037 Emerging Draft, informed by a number of evidence base documents, including the HELAA (2020), the Employment Land Review (2020) the Western Berkshire Functional Economic Market Area Assessment (FEMA) (2016) and the West Berkshire Economic Development Needs Assessment (EDNA) (2016).

Draft Policy SP20 made provision for 62,00 sqm of office (Class E) floorspace and 65,000sqm of industrial, storage and distribution floorspace in the District over the plan period, seeking to address the shortage as outlined in the Employment Land Review (2020), which stated:

"We estimate that as a minimum 65,000 sq m of new floorspace should be provided for office use in the next plan... The Council should scope the next generation of policies so that, if market demand for offices strengthens, it is clear that the 65,000 sq m requirement is a minimum and policy is flexible and supportive for all forms of office development." (Paragraphs 10 and 11); and

".. Demand is also more pressing given the current market shortage, and there is a need to frontload the plan with 16 ha of easily deliverable sites. Four or possibly five potentially suitable sites are identified through the HELAA that are capable of meeting the need for industrial floorspace. All of these sites are extensions to existing employment areas, and these are in the main area of market demand in the east of the District." (Paragraph 12)

The findings of the Employment Land Review document (dated August 2020) prepared by Stantec in relation to industrial, storage and distribution floorspace also reflect earlier findings of the Berkshire Functional Economic Market Area Assessment (FEMA) and Western Berkshire Economic Development Needs Assessment (EDNA) produced in 2016. The executive summary of the EDNA concluded that: *"Demand for industrial space remains strong and very low levels of vacancy reflect a limited supply of industrial accommodation (particularly modern, good quality space). Development of new industrial space in the FEMA has been limited in recent years, with much of the existing stock relatively dated and in need of refurbishment. Local commercial property agents report that demand for industrial premises is currently outstripping supply, and an upward trend in industrial rental values in recent years has led to new speculative industrial development being just about viable within the FEMA. The key issue going forward is a lack of new land and/or space to accommodate new development."*

Therefore it was clear that provision of additional floorspace proposed by draft Policy SP20, including through the creation of new Designated Employment Areas (DEAs) and extensions to existing DEAs, would go some way to meeting the overall demonstrated need.

Furthermore, the ELR (2020) made a series of recommendations to the council. This included to:

- Consider allocating the site for industrial uses ALD6 Land off Benyon Road, Easter Park, Tadley; and, furthermore;

Designate as (Protected Employment Areas (PEAs) Greenham Business Park, the Vodafone Campus, **Easter Park**, Langley Business Court, and the Old Mill Trading Estate. (Our emphasis added);

- It clarifies: “The PEAs are designated for B class use, and their boundaries and role should be reviewed to achieve a balanced portfolio to meet future requirements. There is a general presumption for employment generating uses within the PEAs and against non-employment uses”, and
- Para 4.155 of the ELR document recommends “Easter Park – is a modern business park to the south-east of AWE Aldermaston, and comprises office, light industrial and warehousing activity. There is one small remaining parcel that has permission for warehousing. **The Park should be designated as a PEA.** Land adjoining to the northeast is promoted through the Call for Sites (ALD6 2.1 ha), and is within an area of market attraction for employment uses, and we would support the inclusion of ALD6 within the Easter Park PEA designation.” (Our emphasis added).

As such, and following the recommendations of the EMR, Regulation 18 draft Local Plan Draft Policy SP21 ‘Sites allocated for economic development’ sought to a) classify formally Easter Park as an existing employment area by designating it as a ‘Designated Employment Area’ but also b) propose an extension of the site to achieve 8,400 sqm of new employment floorspace. The site was proposed as Site Allocation EMP3.

Draft Policy SP4 (and supporting Figure 3) identified that Easter Park in its entirety falls within the Detailed Emergency Planning Zone (DEPZ) of Atomic Weapons Establishment (AWE) Aldermaston, which are regulated by the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR). The draft policy stated that “In the interests of public safety, residential development in the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) has advised against that development.” It went on to state that consultation arrangements for planning applications within the DEPZ, for any new development that could lead to an increase in residential or non-residential population (thus impacting on the off-site emergency plan) will be undertaken with the Office for Nuclear Regulation (ONR).

As such it is considered that the proposed allocation of the site adjacent to Easter Park under Draft Policy SP21 was made with full regard to site’s location within the DEPZ and the Government Regulations related to Radiation Emergency Preparedness.

In support of the proposed allocation of the site for employment development in the draft Local Plan, and to address points raised in the HELAA, Hope & Clay construction submitted the following information to further demonstrate that the site is suitable for development:

- Preliminary Ecological Appraisal.
- Illustrative Masterplan.
- Transport Assessment.

The submitted Illustrative Masterplan showed how the proposed expansion of Easter Park, on land adjacent to the existing Hope & Clay site, would deliver approximately 8,245 sqm of employment floorspace (GEA) (broadly in line with the proposed allocation), made up of 3,745 sqm of class E(g) (formerly B1) floorspace; 2,160 sqm of class B2 floorspace; and 2340 sqm of class B8 floorspace, across five units, ensuring an appropriate balance between site coverage and site constraints i.e. the required restoration area/buffers/wayleave.

Representations to Local Plan Review Proposed Submission (Regulation 19) Consultation

The purpose of a Regulation 19 consultation is to ensure that the plan is legally compliant and sound. To ensure the local plan is sound, it should be:

- Positively prepared - Provides a strategy which, as a minimum, seeks to meet West Berkshire Council’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- Justified – ensuring that the Plan provides an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – ensuring that it is deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy - Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF) and other statements of national planning policy, where relevant.

It is in light of these criteria that the Local Plan Review Proposed Submission (Regulation 19) version has been considered.

Policy SP4 ‘AWE Aldermaston and Burghfield’ / Draft Policy SP20 ‘Strategic Approach to Employment Land’ / SP21 ‘Sites Allocated for Employment Land’

Representation are made in regards to West Berkshire Council’s proposed amendments to Policy SP21 which have since removed Easter Park as a proposed Designated Employment Area, and therefore remove EMP3 Land off Benyon Road, Easter Park as a proposed Extensions to Designated Employment Area. In short, the consultation revisions to Draft Policy SP21 confirm that West Berkshire Council are no longer proposing to allocate Easter Park as designated employment site, nor are they considering its extension for additional employment floorspace.

The published updated Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) November 2022, with regards to the site’s expansion, site ‘ALD6 Land off Benyon Road, Easter Park’, simply states that:

“The site will not be taken forward. The site is located within the AWE DEPZ and therefore, it is not considered suitable for development.”

As such, comments in respect of Draft Policy SP21 are interlinked with the council's approach to new development within the DEPZ of Atomic Weapons Establishment (AWE) Aldermaston, as set out at Draft Policy SP4, and so the two are considered together below.

On 22 May 2019, the government introduced the new Radiation (Emergency Preparedness and Public Information) Regulations (REPPPIR) 2019 to strengthen the national emergency preparedness and response arrangements for radiological emergencies. In essence, the regulations are designed to provide a framework for dealing with a potential radiation emergency arising from sites such as AWE Aldermaston. Regulation 8 requires that the local authorities are responsible for setting Detailed Emergency Planning Zones (DEPZ) for nuclear sites where there could be a radiation emergency with off-site consequences, on the basis of the operator's recommendations. Regulation 11 requires that the local authority must prepare an off-site emergency plan for responding to such an emergency, within the DEPZ area. It is not disputed that the site at Easter Park is within the DEPZ of AWE Aldermaston. West Berkshire Council's website indicates that an Off-Site emergency plan is being developed in the Spring of 2023, but also states that this document is **“not a public plan.”**

Paragraph 5.1.4 and Table 17 of the SA/SEA Environmental Report November 2022 provide the council's commentary on changes to Policy SP4 related to AWE Aldermaston (and Burghfield), including to suggest that any new development within the DEPZ will likely be refused (where previously this was limited to residential development), and state that changes *“reflect new information on DEPZ and off-site emergency plans”*. It summarises that the changes are likely to result in negative impacts on social sustainability as the policy seeks to restrict development (residential and employment) from taking place within the DEPZ, and therefore, there will be impacts on the provision of housing, affordable housing and new employment opportunities in the area. We therefore consider this to be a fundamentally flawed approach, for reasons set out below.

In the first instance, it is important to note that the only change in circumstance to the council's assessment of the site at Easter Park has been the submission by Hope & Clay Construction Ltd of additional supporting information in respect of ecology and highways, in addition to a masterplan demonstrating how additional employment floorspace on the site can be suitably and realistically achieved.

The updated HELAA (January 2023) once again confirms (paragraph 2.22) that sites within notified safety zones (eg AWE Aldermaston) will not automatically be excluded and instead *“the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. Therefore sites within notified safety zones have gone through to Stage 2 of the HELAA (site assessment) and advice from the Ministry of Defence has been fed into the site assessments.”* Appendix 4 of the HELAA once again concludes that that the site is available, achievable and 'potentially developable'.

Therefore, it is evident the recommendation drawn by the SA/SEA 2022 is clearly inconsistent with the conclusions of the HELAA and the HELAA methodology, and **no clear reason has been provided by the council as to why this suitable employment site is ruled out purely because of its location within the AWE Aldermaston DEPZ.**

In respect of the site's location within the DEPZ, the Regulation 18 draft Local Plan was published for consultation after the REPPPIR Radiation (Emergency Preparedness and Public Information) Regulations 2019 were revised, and therefore it is reasonable to assume that the Council would have taken account of these Regulations in the preparation of that plan and in the formal allocation of Easter Park as an Designated Employment Site, and in the allocation of adjacent land for its expansion.

At the time of preparation of the Regulation 18 draft plan there had been no increase in risk at AWE Aldermaston: in the AWE Detailed Emergency Planning Zone Report dated 4 March 2020 prepared by the Council's Emergency Planner Ms Richardson for Members of West Berkshire Council it was stated in Section 3 under the heading *“risk management”*, that *“It is important to note that there are no changes in activity on the AWE sites, and there is no greater risk to the public than before this legislation was introduced.”* This is repeated in the conclusion at paragraph 7.1. Subsequently, a further 'declaration of no change' for AWE Aldermaston was issued in November 2022.

Nevertheless, and importantly, the Regulations and the Guidance **do not** preclude development within the DEPZ. They do not state anywhere that development should be prevented from coming forward just because it is in the DEPZ. On the contrary, REPPPIR Regulations recognise that the population within the DEPZ will naturally change within the life of the emergency plan hence why Regulation 12 of REPPPIR requires the Council to, at intervals not exceeding three years, review and revise the emergency plan. The Regulations also envisage that development will come forward within the DEPZ, and there are many passages in the Guidance which acknowledge that development will take place in the DEPZ, particularly Paragraph 250: *“In order to understand if a change in the local area necessitates a redetermination [of the DEPZ], the local authority should consider developments within or adjacent to the detailed emergency planning zone taking into account their potential impact on the effectiveness of the emergency plan.”*

As such, it is only the Council's role to consider whether the Proposed Development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint to development. In short, the REPPPIR-19 does not support the Council's moratorium on development in the DEPZ.

In respect of the council's reference to new information regarding off-site plans, as this key piece of evidence has not been made publicly available, the approach to amending the local plan to prohibit development on this basis is unjustified. Nevertheless, Paragraph 13 of the appeal decision at Boundary Hall, Tadley in 2011 (a copy of the SoS decision is provided at Appendix A), confirms the Secretary of State's conclusion an off site plan is designed to be flexible and can be amended to accommodate the implementation of development proposals: *“the Off Site Plan is designed to be flexible and extendable and that, while it is possible that the implementation of the application scheme would necessitate changes to the Plan, the evidence does not lead to the conclusion that the Plan would fail”.* (paragraph 13).

As such, we consider that the strategy is simply not justified or informed by the evidence, and that the council's misguided approach to the role of the REPRIR has significant repercussions to the delivery of

	<p>much needed employment floorspace, and the objective of sustainable development, which includes balancing employment opportunities with providing new homes and conserving the environment. It is also considered that, given that the starting point for development should be that there is a presumption in favour of sustainable development (NPPF Paragraph 10), we do not consider that the Plan, particularly Policy SP4 (particularly in reference to development likely being refused) has been positively prepared.</p> <p>The Council's approach risks undermining the long term viability of this existing and established employment site. Without recognition of its existing status, or enabling suitable opportunities for growth, the site is restricted by countryside policy; furthermore if it becomes unviable that businesses cease to operate from the site, the result will be a vacant, sterilized, previously developed site.</p> <p>As stated above, the council have a long history of under-provision of employment floorspace, including offices and industrial uses. The council's most recently published evidence base documents, including the West Berkshire Employment Land Review (ELR) Addendum December 2022 and the Employment Background Paper January 2023, once again identifies a significant shortfall in provision against identified need.</p> <p>As drafted, Policy SP21 allocates four sites (ESA1; ESA2, ESA4; and ESA6) for B2/B8 industrial uses, and two sites (ESA3 and ESA5) for Egiii/B2 (office/industrial) uses. Assuming sites ESA3 and ESA5 adopt a 50%/50% split of these uses, the total quantum of new employment floorspace to be provided for across the plan period is as follows:</p> <ul style="list-style-type: none"> • B2/B8 = 63,001 sqm • Egiii = 5,800 sqm <p>This is significantly below the identified need for 91,109 sqm of industrial floorspace and 50,816 sqm of office space as set out at paragraphs 7.8 and 7.4 of the Draft LPR Proposed Submission Version respectively. The LPR is also clear that these demand figures are a minimum. As such, and at present, it is therefore considered that the plan does not meet the government's aims as set out within the NPPF to build a strong and competitive economy, particularly Paragraph 81 which states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.</p> <p>Conclusion</p> <p>In conclusion Hope & Clay Construction Ltd object to the West Berkshire Council Regulation 19 submission version of the Local Plan Review (LPR) to 2039 on the basis that it has not provided an appropriate, evidence-based strategy for development. It is considered unsound for the following reasons:</p> <ul style="list-style-type: none"> • The LPR fails to recognise and support the growth of existing employment sites including Easter Park and risks undermining their success and viability, which is inconsistent with national planning policy; • There is a significant shortfall in employment land provision and the LPR does not identify sufficient additional employment sites to meet the district's employment needs in the context of a consistent under-supply. This is inconsistent with national planning policy; • The proposed removal of Easter Park and proposed extension (site ref. ALD6 - Land off Benyon Road, Easter Park) due solely to the location of these sites within the DEPZ of AWE Aldermaston, has been done so without due regard for the remit of the REPRIR (2019) regulations and is inconsistent with the available evidence base. We consider that complete change of position is not justified by the DEPZ issues, which does not represent a moratorium on development. We consider this strategy to be unjustified and draft Policy SP4 not to have been positively prepared. <p>As a result, the Plan is not sound and should be modified to address the concerns in this letter prior to submission. We trust this Statement clearly sets out our client's position at this stage and respectively request that the above is given due consideration as part of any examination into the West Berkshire Local Plan. Our client would like the option of participating in the examination of the plan to elaborate on these matters.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Russell Trust
Consultee Full Name	I Cheshire R Shaw & The Russell Trust
Consultee Organisation	
Agent Full Name	Mr John Cornwell
Agent Organisation	
Comment ID	PS1178
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The following submissions are made on behalf of the above three landowners who own part of the land allocated under Policy HSA 16 in the Adopted West Berkshire Local Plan 2017. The land in question is identified as Policy HSA16 'Land to the rear of The Hollies Nursing Home, Reading Road and Land opposite 44, Lamden Way, Burghfield Common'. Phase One of the site has already been implemented for some 28 dwellings. The second phase, owned by the above landowners is proposed for 32 dwellings. The allocation of that site was the result of many years of promotion by the landowners and the examination of that land for housing through a lengthy development plan preparation process. The allocation was followed by the optioning of the land by a reputable local developer and the submission of a detailed planning application in early 2022 under ref: 22/00244/FULEXT.</p> <p>Between the adoption of the Local Plan in May 2017 and the submission of this planning application in February 2022 there was a material change to the planning policy context to this site by the extension of the Detailed Emergency Planning Zone (DEPZ) at AWE Burghfield to cover all of the settlement of Burghfield Common, including this allocation site. This change occurred in March 2020. In December 2020 the Council consulted on this Local Plan Review Emerging Draft which commenced in December 2020, nine months after the DEPZ had changed, yet the site was still proposed for allocation in that Draft Plan. It is assumed that the Council's Emergency Planning Officer, AWE personnel and the Office for Nuclear Regulation (ONR) were consulted on this Draft Plan and had no objection to the inclusion of this housing allocation at that time despite the site now clearly inside the revised DEPZ area. There was therefore no necessity to challenge the Draft Plan's provisions at that time as far as this allocation was concerned. It was assumed, reasonably, that the Council had taken the DEPZ changes into account and had determined that the allocation should be maintained because of its statutory status and that the site was capable of accommodating new housing without adversely affecting the ability of the Council to implement the Emergency Offsite Plan.</p> <p>During consideration of the planning application the Council's Emergency Planning Officer objected to the proposed development and the application was subsequently refused, essentially the principle issue being the site's location within the DEPZ. That decision is awaiting an appeal decision by way of a Public Local Inquiry at the time of writing.</p> <p>The purpose of these submissions is therefore twofold. Firstly, to secure the reinstatement of this Housing Allocation in this Local Plan Review; and second, to seek a revision to Proposed Policy SP4 'Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield'.</p> <p>The need for a Revised Policy SP4 'Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield.</p> <p>A similar Policy to that now proposed, has been in place in both West Berkshire, Wokingham Borough, Reading Borough and Basingstoke and Deane District for some 15 years. It has led to serious inconsistencies in decision making depending on the LPA area involved; and to tensions, with Members often overriding Emergency Planning and ONR objections to allow the development concerned. Some applications have been required to submit a Radiological Impact Assessment (RIA) and have still been refused even when that RIA clearly demonstrated no adverse impact on the implementation of the Emergency Plan; while other applications have been allowed without being required to submit an RIA and with no objection from Emergency Planning or ONR. The result is that these DEPZ development restraint policies are being applied inconsistently and unreasonably and the credibility of the policies is being seriously undermined.</p> <p>A major problem is that none of the refused applications has been taken to appeal by way of a public local inquiry where detailed evidence could be examined. That situation has recently been resolved in relation to a site at Three Mile Cross, in Wokingham Borough, for 49 dwellings (Appeal Ref: APP/X0360/W/22/3304042 refers). The relevant Development Plan Policy states that development will only be permitted when the applicant demonstrates that the increase in the number of people living, working, shopping, and/or visiting the proposal can be safely accommodated having regard to the needs of 'blue light' services and the Emergency Plan for the AWE site. The Inspector notes, at para 11, that the risk of an incident is very small, with a risk assessment concluding that such an event could occur on a 1 in 10,000 year basis. Additional factors reduced that even further to a single event in many more thousand or millions of years. This was on a greenfield site which was:</p>

- outside of an adopted Settlement Policy Boundary, and not allocated in an Adopted or Emerging Local Plan;
- larger than this H16 site;
- and which was located north-east of AWE Burghfield and therefore downwind of the facility (prevailing wind being from the south-west) whereas H16 is upwind of that facility.

All of these are further mitigating factors in favour of the reinstatement of the H16 allocation.

The Inspector notes, at para 21, that other appeal decisions that have been refused have been the subject of appeals by way of 'written representations' where the Inspectors have rightly assumed a precautionary approach in the absence of detailed evidence. In comparison the evidence presented at the Three Mile Cross Inquiry was thoroughly examined and tested.

The Inspector concludes that the proposal (para 22 refers)

'...would not present a barrier to the ability of blue light services to safely carry out their duties, and nor would it affect the Council's ability to execute and manage its obligations under the REPPPIR Plan. Furthermore people living in or using the appeal site could be safely accommodated'

The facts of the matter and the reasoning undertaken by the Inspector on the basis of the evidence before him, make it clear that there must be some flexibility in the application of these AWE policies; that they can not reasonably be used to apply a blanket refusal to accept any further development within the DEPZ. Development proposals must rather be determined on the basis of the weighing of the factors in each individual case. These policies do not allow for this as proposed, and are therefore unreasonable, and are leading to inconsistent decision-making to the detriment of the proper comprehensive planning of the area.

As noted above similar policy inconsistencies are also occurring in the other three local planning authority areas impacted by the DEPZ designations at AWEs Aldermaston and Burghfield. Particularly, in respect of Basingstoke and Deane Borough whose Local Plan Review is also moving forward at the present time I made representations to that Review and proposed a revision to the relevant Policy (SS7 in that case) in November 2020. The intention was to revise the wording of the policy to facilitate the above-mentioned requirements. A similar policy wording is now set out here for consideration:

'Policy SP4 Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield

The Council requires development in the land use planning consultation zones surrounding (1) Aldermaston and (2) Burghfield to be managed in the interests of public safety.

Development proposals will be required to be accompanied by a Radiological Impact Assessment (RIA) prepared by a recognised specialist. The RIA will evaluate the potential impact of the proposed development on the Offsite Emergency Plan, including the use and scale of development proposed, and the location of the development, against the following criteria:

- 1 **Warning and informing of the affected population;**
- 2 **Short-term and long term sheltering;**
- 3 **Evacuation and relocation/resettlement needs;**
- 4 **Access and egress for emergency vehicles;**
- 5 **Requirements for resettlement, decontamination and long-term recovery;**
- 6 **Any other notified appropriate issues.**

If the RIA demonstrates to the satisfaction of the Council that the Offsite Emergency Plan can accommodate the needs of the population in the event of an emergency then the proposed development will be considered acceptable under the terms of this policy'.

This revised policy wording is intended to enable policy SP4 to be clearer, criteria-specific and robust, whilst allowing for appropriate development which meets the policy tests. The above policy wording was prepared in close consultation with Dr. Mike Thorne, and acknowledged radiological impact expert, and who gave expert evidence at the recent Three Mile Cross Inquiry referred to above.

In conclusion, Proposed Policy SP4 and its predecessors are unreasonable and open to inconsistent application, to the detriment of the policy itself and good planning in general. The policy wording is too constraining, preventing new development in locations which are entirely appropriate; and unreasonably constraining fully sustainable settlements such as Burghfield Common from accommodating their share of new housing growth. Housing Allocation HSA16 is an example of such an appropriate location. Half of it has already been developed, it is allocated in a statutory Local Plan and its development will not adversely impact on the ability of the Council to implement the Emergency Offsite Plan. The allocation should properly be reinstated as a Housing Allocation in this Local Plan Review. Proposed Policy SP4 should be re-worded as set out above.

I would be grateful if you would take these comments into account in your further Local Plan Update preparations. If any additional information of clarification is required please do not hesitate to contact the writer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1569
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We have reviewed the policies and site allocations in relation to our remit (flood risk, biodiversity and conservation of fisheries and the water environment, groundwater quality and contaminated land, water quality and water resources) and have provided you with comments below. These comments are not soundness issues but will provide some clarity to the plan.</p> <p>We make no comments or suggest amendments to policies SP4 or DM33 of the draft plan. The Environment Agency is part of an offsite planning group who are consulted by West Berkshire District Council on any development proposals in the Detailed Emergency Planning Zone (DEPZ) of the AWE sites. We have permitted a number of activities and installations within AWE sites under our regulatory requirements and influences and would expect that AWE, or any other organisation undertaking new activities in developments considered under DM33 to consult with us if their activities would require environmental permits.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucklebury Parish Council (Represented by Andrew Black Consulting)
Consultee Full Name	Bucklebury Parish Council
Consultee Organisation	Bucklebury Parish Council
Agent Full Name	Andrew Black
Agent Organisation	Andrew Black Consulting
Comment ID	PS1255
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:11:00
Attached Files	Andrew Black Consulting (Bucklebury PC) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	No

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep' for full consultation response]</p> <p>AWE Aldermaston and Burghfield (SP 4)</p> <p>The LPR contains very limited information regarding AWE Aldermaston and AWE Burghfield which is illogical given the significant impact this has had on the overall strategy for WBC including the site selection process.</p> <p>The changes to the Detailed Emergency Planning Zone for AWE Burghfield covers the area formerly identified for Grazeley Village and the allocation was subsequently dropped following objection from the Defence Nuclear Organisation.</p> <p>Paragraph 6.33 of the supporting text on Policy SP4 (Site Allocations in the Eastern Area) states that <i>if in future the DEPZ is reviewed and emergency planning arrangements are amended then future reviews of the Local Plan will consider whether strategic allocations in this area would be suitable</i>. Given the history of the DEPZ it is equally possible that the area could again be increased which would have a severe impact on the allocation for North East Thatcham and other allocations.</p> <p>BPC has identified that the approach taken to the DEPZ has been inconsistent and subject to significant changes in the period leading up to the regulation 19 consultation. BPC also has concern over the consultation process with AWE, particularly over the strategic allocation of a scale of development the size of North East Thatcham which is within the Outer Consultation Zone. There is a lack of compelling evidence that WBC has adequately consulted and considered the impact of AWE Aldermaston and AWE Burghfield in the preparation of the LPR.</p> <p>BPC will set out further information on this matter should the LPR reach the examination process.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>BPC has wider concerns around the way in which WBC has undertaken the consultation process for the LPR and the Duty to Cooperate in general. Failings with Duty to Cooperate are matters which are not capable of being remedied in advance of the plan being submitted for examination. BPC will set out further details of these failings to the inspector should the plan be submitted to the Planning Inspectorate by WBC.</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence through the submission of matters statements and oral evidence from experts.</p> <p>To provide updated evidence to the examiner. For other relevant experts employed by parish council to give detailed technical views on matters.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Green Park Reading No.1 LLP (GPR) (Represented by Deloitte)
Consultee Full Name	Green Park Reading No1. LLP (GPR)
Consultee Organisation	Green Park Reading No.1 LLP (GPR)
Agent Full Name	Phil Wright
Agent Organisation	Deloitte
Comment ID	PS1223
Chapter / Policy / Appendix Number	Policy SP 4
Chapter / Policy / Appendix Title	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
Order	20
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:50:00
Attached Files	Deloitte obo Green Park Reading No1 LLP_Figure 1.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>West Berkshire Local Plan Review to 2039 – Regulation 19 Proposed Submission Consultation</p> <p>We write on behalf of our client Green Park Reading No.1 LLP, which is the owner of Green Park. Green Park Reading No.1 LLP (“GPR”) is ultimately wholly owned by Mapletree Investments Pte Ltd (“Mapletree”). This response relates to the Regulation 19 Proposed Submission Consultation of the West Berkshire Local Plan Review (“the LPR”), which is open for comment until 3 March 2023. Deloitte previously responded to two Regulation 18 Consultations on behalf of GPR on 21 December 2018 and 5 February 2021.</p> <p>In writing this letter, we do so under the statutory provisions of a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Background to Green Park</p> <p>Since acquiring GPR in 2016, Mapletree has been reviewing the Park’s potential, undertaking asset management and considering future opportunities. GPR is keen to support the Council in achieving sustainable development in the Borough.</p> <p>Green Park is a premier business park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of the three local authority areas, covering a 79-hectare plot offering high quality office stock and associated amenities, located around a central body of water.</p> <p>Green Park is accessed from the A33 relief road and is located south of Reading town centre. The Park is home to a variety of office occupiers across a range of business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.</p> <p>The Park continues to be highly successful with ongoing interest from both global and smaller companies for office space. In 2016/17, Aukett Swanke undertook a refresh of the Fosters masterplan prepared in 1998 in order to update the development potential of the Park. Mapletree continue to look for opportunities to respond to market demand and manage the planned growth of the Park in a sustainable way. Securing an allocation for employment uses on land at 900 South Oak Way forms part of this ambition (referred to hereafter as the Site (see Figure 1 below)).</p> <p><i>[See attached map - Deloitte obo Green Park Reading No1 LLP_Figure 1]</i></p> <p>Previous Response to Regulation 18 Draft Local Plan</p> <p>On behalf of GPR, Deloitte submitted formal representations in response to the LBW Pre-Publication (Regulation 18) Draft Local Plan on 21 December 2018 and 5 February 2021. As part of the previous consultation, GPR proposed a series of changes, including the below:</p> <ul style="list-style-type: none"> • Requested that Green Park was included as a Designated Employment Area; • Requested an emphasis on the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park; • Requested support for Data Centres; and, • Requested clarification be added to Policy SP 4 that although the Office for Nuclear Regulation will be consulted, it is unlikely this will restrict non-residential development in the Detailed Emergency Planning Zone (DEPZ). <p>Local Plan Regulation 19 Response</p> <p><u>Policy SP4: Atomic Weapons Establishment (AWE)</u></p> <p>Aldermaston and Atomic Weapons Establishment (AWE) Burghfield Policy SP4 identifies Green Park within the Burghfield Atomic Weapons DEPZ. It is stated that residential development within this zone is likely to be refused planning permission, especially if the Office for Nuclear Regulation (ONR) objects to the development. It also identifies that any new development in the DEPZ that could lead to an increase in non-residential populations will be considered in consultation with the ONR. GPR notes the updated maps to take account of the revised consultation zones as of March 2020. The Site is also now located in the 12km consultation zone for the AWE Aldermaston which requires consultation for major hazard facilities and military uses.</p> <p>GPR recognises the need to consult the ONR for non-residential planning applications within the DEPZ. However, subject to appropriate emergency planning, it is not anticipated that non-residential development would have a significant impact on the off-site emergency plan for AWE Burghfield. Furthermore, it is</p>

	<p>considered that employment uses identified in either extant planning consents or established business park locations should also still be recognised as appropriate for further development of the same use. GPR therefore reiterates its request that clarification is added to Policy SP4 that although the ONR will be consulted, it is unlikely this will restrict non-residential development in the DEPZ subject to appropriate consideration of emergency planning.</p> <p>GPR notes that the ONR consultation zones will be reviewed every three years. In discussions with West Berkshire previously, it has been noted that there would be the publication of guidance for developers to refer to in relation to the consultation process and timescales with regard to applications impacted by the AWE facilities and related DEPZs. GPR requests an update on this guidance and that its principles are included within the Local Plan.</p> <p>Summary</p> <p>In summary, GPR welcomes the West Berkshire LPR and the published Regulation 19 document. However, GPR requests several modifications to the LPR as set out in this letter. In particular, GPR requests that the identified Site is classified as a Designated Employment Area to reflect its existing uses and its existing allocation, and that additional guidance is given in relation to the consultation process and considerations for development located within a DEPZ.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Basingstoke & Deane Borough Council
<p>Consultee Full Name</p>	Anne Shattock
<p>Consultee Organisation</p>	Basingstoke & Deane Borough Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1722
<p>Chapter / Policy / Appendix Number</p>	Policy SP 4
<p>Chapter / Policy / Appendix Title</p>	Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield
<p>Order</p>	20

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 09:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	It is noted that policy SP4 of the draft Plan sets out planning policy requirements in respect of the Atomic Weapons Establishments at AWE Aldermaston and Burghfield, including details of the DEPZ, OCZ and 12km consultation zone. It is recognised that this policy is in response to the requirements of the Office for Nuclear Regulation. The council has ongoing concerns about how restrictions relating to the AWE are applied to the borough and, most notably, the limitations they place on future sustainable growth at Tadley. The council would like to continue to work proactively with Emergency Planners at West Berkshire to ensure a suitable approach is taken to future growth and change and that all options, including suitable housing allocations, are fully considered.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy SP 5 Responding to Climate Change

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bradfield College (Represented by Lucy White Planning)
Consultee Full Name	Julia Bond
Consultee Organisation	Bradfield College
Agent Full Name	Lucy White
Agent Organisation	
Comment ID	PS16
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	23/02/2023 10:03:06
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comment.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<ul style="list-style-type: none"> • Bradfield College broadly supports the principles of Policy SP5 to deliver new developments which are more resilient to climate change. In particular, it supports the recognition that the application of the policy will depend on the nature and scale of the proposals. It is often impractical or inefficient in the case of small scale alterations or extensions to existing College buildings to overhaul the energy strategy for the building as a whole, or to introduce a separate energy strategy for the extension alone when the existing infrastructure remains fit for purpose and could support an enlarged building. Bradfield College acknowledges it has a significant part to play in reducing carbon emissions and is exploring opportunities to introduce renewable and low carbon infrastructure as part of a whole campus strategy. In accordance with NPPF, paragraphs 155 and 156, Policy SP5 should support employers and organisations to develop such strategies and for these to be taken into account when considering planning applications for individual development proposals on campus which may benefit from a longer term approach for lower carbon/renewable energy sources. • The following observations are made regarding the policy criteria: <ul style="list-style-type: none"> • In accordance with the National Planning Policy Framework (paragraph 154, 2021 Version), any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Accordingly, Policy SP5 can encourage but not require delivery of measures which would exceed the prevailing Building Regulation requirements. • Criteria c) and e) require new development to generate and supply of renewable, low and zero carbon energy and to supply local distribution networks. In the case of schools, colleges and other institutions, the policy should be positively prepared to support the delivery of energy strategies which could ultimately meet the whole campus needs through renewable and low carbon energy generation. This policy should recognise that it may not be feasible or practical for all individual developments to generate and supply energy but opportunities may exist to connect into existing or proposed "off-site" renewable/low carbon infrastructure as part of a whole campus energy strategy.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>No comment.</p>
<p>4. Proposed Changes</p>	<p>The following observations are made regarding the policy criteria:</p> <ul style="list-style-type: none"> • In accordance with the National Planning Policy Framework (paragraph 154, 2021 Version), any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Accordingly, Policy SP5 can encourage but not require delivery of measures which would exceed the prevailing Building Regulation requirements. • Criteria c) and e) require new development to generate and supply of renewable, low and zero carbon energy and to supply local distribution networks. In the case of schools, colleges and other institutions, the policy should be positively prepared to support the delivery of energy strategies which could ultimately meet the whole campus needs through renewable and low carbon energy generation. This policy should recognise that it may not be feasible or practical for all individual developments to generate and supply energy but opportunities may exist to connect into existing or proposed "off-site" renewable/low carbon infrastructure as part of a whole campus energy strategy.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	<p>No comment.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hermitage Parish Council
Consultee Full Name	Nicky Pierce
Consultee Organisation	Hermitage Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS387
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 10:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>HPC does not feel competent to provide such detailed comments on proposals for other parishes; but we would like to express our support for the following overarching policies:</p> <ul style="list-style-type: none"> • SP5 Responding to climate change
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Donnington New Homes (Represented by Pegasus Group)
<p>Consultee Full Name</p>	Mr Philip Simmons
<p>Consultee Organisation</p>	Donnington New Homes
<p>Agent Full Name</p>	Rebecca Humble
<p>Agent Organisation</p>	Pegasus Group
<p>Comment ID</p>	PS703

Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Sandleford Park West (SPW) My client continues to support the principles of this policy which seeks to ensure new development responds appropriately to climate change. However, the introduction of the requirement to 'achieve net zero operational carbon development' poses a risk to the viability of new development which, in turn poses a risk to the delivery of new development and, ultimately, the delivery of the targets contained within the Council's Plan. The inclusion of the words '....will be <u>required to</u>' represents an excessively

	<p>onerous expectation at a time when development is already being challenged by the introduction of BNG later in (November) 2023. Since the Regulation 18 Plan was published, Part L of the Building Regulations has come in force. This provides a measurable benchmark against which new development could be considered. To futureproof the Policy, the wording should be amended to require new development to comply with the Building Regulations in force at the time the development is considered instead to requiring all new development to meet potential unattainable targets that render a development unviable. The deletion of the 'blue' infrastructure from 'k.' of the policy limits the valuable contribution new and existing water environments can make to the ability of new development to positively respond to climate change over time.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Canal & River Trust
Consultee Full Name	Mrs Jane Hennell
Consultee Organisation	Canal & River Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS419
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	01/03/2023 14:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	It is not clear why 'blue' has been removed at bullet point K. The plan refers to green and blue infrastructure numerous times within the plan.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jardim, Jean-Claude
Consultee Full Name	Jean-Claude Jardim
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS558
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 22:55:42
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>I propose that within Policy SP5 the objective of enabling and promoting the consumption of local goods and materials is added, and that favourable consideration is given to developments that aid this. This will ultimately reduce transport emissions, and aid the Net Zero goal while enabling local economic opportunities. Making West Berkshire a more robust to external risks, as the Covid Pandemic has shown us we can't continue to be wholly reliant on globalization to meet local demands.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS597
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 11. SP5. The Plan proposes to build on Thames Water peat bog which is a flood plain. We strongly object to this as it would drastically increase the flood risk to Theale residents. The peat also helps address the importance of climate change due to the peat capturing carbon. The Plan conflicts with the identified site, policy RSA11. SP5 and SP6 therefore conflict each other.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Marriage (Represented by ET Planning)
Consultee Full Name	Messrs Marriage
Consultee Organisation	
Agent Full Name	Robyn Milliner
Agent Organisation	ET Planning
Comment ID	PS403
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	28/02/2023 11:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The principles of Policy SP5 are supported. Whilst the policy itself focuses on low and zero carbon technologies, it is suggested that reference is made to supporting infrastructure associated with renewable energy, specifically battery storage and the key role these provide in ensuring the national grid is stable. There is also a need for battery storage to be located in appropriate and suitable locations in close proximity to the renewable source and this element should be recognised within the policy and supporting text.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it	Yes

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	<i>To represent my clients' best interests and explain the merits of the site and why it should be included within the site boundary</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS532
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:26:09
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	RBC supports this policy. Both WBDC and RBC have declared a Climate Emergency, and application of this policy will be critical in moving towards net zero carbon in the area.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Vilna Walsh
Agent Organisation	Firstplan
Comment ID	PS763
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:46:00
Attached Files	Firstplan (Englefield Estate) Full Rep.pdf Firstplan (Englefield Estate) Appendix 5.pdf Firstplan (Englefield Estate) Appendix 1.pdf Firstplan (Englefield Estate) Appendix 3.pdf Firstplan (Englefield Estate) Appendix 2.pdf Firstplan (Englefield Estate) Appendix 4.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comment
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><i>For Full Representation see attachment.</i></p> <p><i>By reference to Response Form Question 2, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below.</i></p> <ul style="list-style-type: none"> • <i>The Plan is not positively prepared – it does not respond to identified need and it does not facilitate sustainable development.</i> • <i>The Plan is not justified – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.</i> • <i>The Plan is not Consistent with National Policy – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); and considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	No comment
4. Proposed Changes	<p><i><Proposed Changes shows as underlined for additions and strikethrough for deletions></i></p> <p>Policy SP5, Responding to Climate Change</p> <p><i>"The principles of climate change.....Depending on the nature and scale of proposals, development will be expected to satisfy the following criteria:</i></p> <ol style="list-style-type: none"> 1 To withstand... 2 To take advantage.... 3 To achieve net zero..... 4 To achieve the highest... 5 To generate and ... 6 To provide for sustainable forms of vehicular and personal transport... 7 <u>To demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured.</u> 8 To enable....
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>Response made raises significant issues with regard to the soundness of the plan if the proposed amendments are not made.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS784
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>CHPT 5 – OUR ENVIRONMENT & SURROUNDINGS</p> <p>A General Comment is that I find this Chapter a little confusing and lacking and if it were retitled Climate Change & the Natural Environment it would be more logical and easier for Planning Officers & Developers to find and follow development Planning Policy.</p> <p>SP5 – REPONSE TO CLIMATE CHANGE</p> <p>This Policy is a bit motherhood and apple pie. And I expect to see much more Policies identified under this as an Umbrella topic:</p> <ul style="list-style-type: none"> • Standalone Renewable Energy, Solar Farms (WBC are building one themselves so need development policy), Windfarms, Hydro- electric, Bioenergy, (no tidal) • Water Management, Water Supply, Flood Risk Management, Sustainable Drainage, Water Protection Zones, Water Quality, Wastewater & Sewage disposal, Water Source Protection Zones, Water Pollution, Chalk Rivers Management, Canalside development, Water Neutrality/NNZ, • Preserving the Natural Landscape, Landscape Gaps, Local Wildlife Corridors, • Biodiversity, Biodiversity Net Gain, Geology • Landscape Character, International & National Designated Habitats, Trees/Hedgerows/Woodlands as part of Landscape, Countryside • Air Quality Management & Air Pollution • Lighting Management & Light Pollution. I cannot see a Dark Skies Policy • Noise Management & Noise Pollution • Preventing Heat Hotspots • Managing Contaminated Land, Source Protection Zones, Building on Contaminated Land, Managing Pollution from Contaminated Lands – no current Contaminated Land Strategy or Policy (it has expired)
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rectory Homes Ltd
Consultee Full Name	Steven Kerry
Consultee Organisation	Rectory Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS753
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:09:00
Attached Files	Rectory Homes REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p><i>[For full response see attached document]</i></p> <p>SPS: Responding to Climate Change</p> <p>Since the previous iteration of the Local Plan Review, part c) has been added to the policy requiring all development to achieve net zero carbon operationally. Whilst it is clear that there is a transition towards zero carbon development, and rightly so, this transition will not happen instantaneously. It will take the development industry, including building suppliers, materials and technical design specifications, a period of adjustment to ensure the processes and products are in place to successfully facilitate zero carbon development nationally.</p> <p>It is our position therefore that the most effective way of achieving more energy efficient housing is through the application of building regulations and implementation of the Future Homes Standard. This provides a clear and universal set of requirements providing certainty to developers from the outset.</p> <p>We maintain our objection to the requirement of Policy SPS for all development to achieve the highest viable levels of energy efficiency (part d) as such an approach will require a viability assessment to be submitted with every planning application, leading to further delays due to negotiations regarding what level of efficiency can be achieved. The planning process already takes a considerable amount of time and it is our experience that even small-scale developments can take in excess of a year to be determined. The requirement for a viability assessment to assess the maximum energy efficiency measures that can be provided will delay the timescales of planning applications from date of submission to determination further.</p> <p>Whilst Rectory Homes are committed to responding positively to climate change and we strive to make improvements to the efficiency of our development schemes where possible, the requirements under Policy SPS as drafted provides no certainty to the applicant or the decision maker as to what is expected. This is contrary to Paragraph 16 of the NPPF which requires local planning policies to be unambiguous. In light of the above, parts c) and d) are unsound as they are not consistent with the Framework relating to technical building standards.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Bell Cornwell LLP)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Brigid Taylor
Agent Organisation	Bell Cornwell LLP
Comment ID	PS1242
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	As currently drafted the policy is not capable of giving the certainty required. It calls into doubt the accuracy of the whole plan viability assessment, which purports to assess the financial impact of a policy which is not clear on its scope of application.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The policy is not clearly drafted. Requiring development 'to contribute to' carbon neutrality by 2030 is an admirable aim, but the expectations are not clearly set out here. Of key concern is the fact that the detailed requirements of sub clauses a) to m) (setting out carbon neutrality measures) will be expected "depending on the nature and scale of proposals". The expectation should be set out clearly so that developers know what will be expected of them and can factor this into the development models. It is difficult to understand how the whole plan viability assessment has assessed the cost implications of policy SP5, when the policy itself does not give any indication what scale or type of development proposal will be subject to it. Our client supports efforts to improve building / energy standards and progress toward carbon neutrality; it simply wishes to ensure the expectations are clear, transparent, and applied equally so there is a level playing field.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Policy needs to be redrafted to make clear what scale of development will be subject to the requirements of the proposal. Remove words 'depending on the nature and scale of proposals' and replace with clear wording setting thresholds for application of the policy requirement.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1184
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	Yes

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>While we broadly support the proposed policy, including the intention we infer underlies criterion m, there are ways other than reversibility and minimum intervention that could enable improved environmental performance. So, the criterion as worded could be unintentionally constraining. We suggest simplifying the criterion as shown.</p> <p>Further work the Council may decide to undertake on measures that could enable the District to reach its net zero ambitions could reveal other principles that the Council may find useful. We advise also referring to a 'whole building approach' as stated in paras 5.55 and 10.92 of the submission plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Depending on the nature and scale of proposals, development will be expected to satisfy the following criteria:</p> <p>m. To maintain the integrity of the historic environment and to respect the character and improve the environmental performance of heritage assets without compromising their significance, by adopting principles of reversibility and minimum intervention in accordance with Policy SP9. <u>This necessitates taking a whole building approach and use of appropriate materials.</u>"</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Network Rail
<p>Consultee Full Name</p>	Ms Lisa Bullock
<p>Consultee Organisation</p>	Network Rail
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1104

Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>c) Comments on other LPR Draft Policies (SP1, SP5, SP23, DM42 and supporting text)</i> In non-site-specific terms the LPR policies in respect of spatial strategy, climate change and transport considerations also raise concerns in the context of the tests of soundness. The spatial strategy, climate change policy and transport policy should equally be consistent with National Policy requirements with regard to supporting and promoting sustainable transport.

Across the LPR there are concerns that opportunities for policies to support sustainable development and specifically to encourage modal shift (to ensure the plan is positively prepared and consistent with national policy) have not been included. This again raises issues of soundness.

The LPR as currently drafted is not consistent with NPPF requirements in terms of meeting the challenge of climate change (paragraphs 152-154). Neither is it consistent with wider national policy

d) Consideration of Tests of Soundness

By reference to **Response Form Question 2**, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:

- **The Plan is not positively prepared** – it does not respond to identified need and it does not facilitate sustainable development.
- **The Plan is not justified** – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.
- **The Plan is not Consistent with National Policy** – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

e) Changes required to make the West Berkshire Proposed Submission (Reg 19) Local Plan Sound

By reference to **Response Form Question 4** changes are identified as being required to make the West Berkshire Proposed Submission Local Plan sound. Specifically, the changes are required to ensure the plan is positively prepared, justified, and consistent with National Policy.

To address the concerns raised with regard to soundness and specifically the failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes are sought in the context of spatial strategy, climate change and transport policies. Additionally, in site specific terms express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan 'sound' are as follows: (Changes required shown in red underlined/struck through). It is confirmed that the schedule of required changes has been jointly drafted and agreed between NR, Bampton and the Englefield Estate.

Schedule of Required Changes

(b) Policy SP5, Responding to Climate Change

"The principles of climate change.....Depending on the nature and scale of proposals, development will be expected to satisfy the following criteria:

- a. To withstand...
- b. To take advantage....
- c. To achieve net zero.....
- d. To achieve the highest...
- e. To generate and ...
- f. To provide for sustainable forms of vehicular and personal transport...

g. To demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured.

gh. To enable....

Early discussion with West Berkshire Council with regard to the representations made and suggested changes would be welcomed.

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Royal Borough of Windsor & Maidenhead
Consultee Full Name	Royal Borough Windsor & Maidenhead
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1540
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We are also pleased to see the West Berkshire Local Plan Review includes a policy (SP5) on responding to climate change, in particular setting ambitious expectations that new development will achieve net zero operational carbon (policy SP5 c.)</p> <p>In conclusion, the Royal Borough of Windsor and Maidenhead has no concerns or objections to the Regulation 19 version of the Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1739
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	5.3 Policy SP5 'Responding to Climate Change – We support the general aim of this policy, however the wording should require conformity with Building Regulations in force at the time of development coming forward due to the period of time covered by the plan period. There is vagueness within the policy relating to the viability of energy efficiency levels. This provides uncertainty for developers and should be re-worded.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1314
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change

Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Object. Bloor Homes supports the Council's objective to ensure development responds positively to the challenges of climate change but an amendment is required to Policy SP5 to ensure it is effective and, therefore, sound.</p> <p>Policy SP5 sets out the Council's overarching policy with respect to climate change which directly supports the NPPF and specifically Paragraph 153, which states; 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.</p> <p>Furthermore Paragraph 154(b) states; 'New development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local</p>

	<p>requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.'</p> <p>In addition to a range of requirements which consider the climate resilience and adaptability of development, the Policy includes criteria c., d, and e., which relate to energy and carbon emissions.</p> <p>These are set out below:</p> <p>c. To achieve net zero operational carbon development by applying the energy hierarchy, achieving the highest viable levels of energy efficiency, generating and supplying renewable, low and zero carbon energy, and as a last resort carbon offsetting in accordance with Policy DM4;</p> <p>d. To achieve the highest viable levels of energy efficiency;</p> <p>e. To generate and supply renewable, low and zero carbon energy for its own use and/or local distribution networks in accordance with Policy DM4;</p> <p>Para 6.55</p> <p>Object. The supporting wording is not justified or consistent with national policy guidance. Supporting paragraph 6.55, which specifies that additional policy criteria will be added as the Local Plan Review progresses. Now the plan is at consultation stage, this caveat should be removed. The policy needs to be clear and sound, giving certainty to the developers.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Proposed amendment 1.</p> <p>Criterion c. should also be amended to reflect the reality that the energy solution for a site must be viable to be deliverable. This will assist in ensuring that the policy is effective as it will facilitate sustainable delivery of the development strategy for housing and other development set out in the plan.</p> <p>c. Where viable and practical, To achieve net zero operational carbon development by applying the energy hierarchy, <u>achieving the highest viable levels of</u> enhancing energy efficiency, generating and supplying renewable, low and zero carbon energy, and as a last resort carbon offsetting in accordance with Policy DM4;</p> <p>Proposed amendment 2.</p> <p>To ensure that SP5 provides an over-arching strategy policy approach to climate change and to provide consistency with the requirements of Policy DM4 (and Bloor Homes' representations to DM4), criteria d. and e. of Policy SP5 should be removed. Criteria d and e are appropriately included in the more detailed climate change development management policy (DM4).</p> <p>d. To achieve the highest viable levels of energy efficiency;</p> <p>e. To generate and supply renewable, low and zero carbon energy for its own use and/or local distribution networks in accordance with Policy DM4;</p> <p>Para 6.55 - Remove</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Yes. To provide the Inspector with further explanation of the need for appropriate policy wording to ensure a deliverable approach towards the delivery of climate change resilient development in West Berkshire.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1594
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 16:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p><i>*Late Response*</i></p> <p>There is no mention with in the LPR about micro-generation, the use of solar panels on houses as well as micro wind turbines, where appropriate to install them. As well as other evolving micro-generation technologies that would put the District reducing it's carbon foorprint.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Thames Valley Chamber of Commerce (Represented by DPDS Consulting Group Ltd)
<p>Consultee Full Name</p>	Mr Paul Britton
<p>Consultee Organisation</p>	Thames Valley Chamber of Commerce
<p>Agent Full Name</p>	Ms Mandy Wetherell
<p>Agent Organisation</p>	DPDS Consulting Group Ltd
<p>Comment ID</p>	PS1625
<p>Chapter / Policy / Appendix Number</p>	Policy SP 5
<p>Chapter / Policy / Appendix Title</p>	Responding to Climate Change
<p>Order</p>	24
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p>	E-Mail

* Unknown	
Response Date	03/03/2023 16:22:00
Attached Files	DPDS obo TVCC_attachment_full rep_redacted
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<See attached report for full representation - DPDS obo TVCC_attachment_full rep_redacted> <u>Policy SP5 Responding to Climate Change</u> The Chamber supports the Council's commitment to responding to the ongoing climate emergency, and agrees with the criteria set out within this policy. This is in line with the Chamber's stated Local Plan Priority of promoting "initiatives that support a green recovery, and proposals that are helping to build a

	<p>local economy centred around net-zero, sustainability principles and social purpose". However, the policy could provide greater clarity on the thresholds for each criteria.</p> <p>Conclusion</p> <p>These representations have outlined West Berkshire Chamber of Commerce's concerns as to the soundness of the Local Plan preparation process. The primary concern of WBCC is that the proposed policies regarding designated employment areas, in particular SP20 as exemplified by the Council's approach to LRIE, are unsound and do not go far enough to ensure that the development or redevelopment of DEAs across the district is sustainable and creates the best conditions for attracting inward investment. This is as well as the policies potentially not being appropriately justified. As they are, the policies run the risk of enabling piecemeal development at Designated Employment Areas which would result in a lower quality of land available for business use as well as potentially resulting in vital environmental investigation not being able to take place.</p> <p>As such, various modifications have been proposed to ensure the soundness of the Local Plan. Most importantly, a development-plan and SEA led framework of criteria-based site specific policies for each DEA should be adopted which would guarantee that development or redevelopment is sustainable and can create the best conditions for inwards investment and regeneration. There have also been several wider minor comments and representations on other policies throughout the Local Plan.</p> <p>To conclude, these representations have concluded that the Proposed Local Plan is potentially unsound and we therefore respectfully request that the sentiments of these representations be fully considered and reflected in further Modification to the submitted Local Plan.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	We believe it is necessary as we are proposing significant modifications and the content of our representations is important.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1500
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p>	Web

* Web * Unknown	
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework. Policy SP5 sets out a number of criteria for new developments requiring climate change mitigation and adaptation to be embedded into new development. These criteria are to be applied 'depending on the nature and scale of the proposals' and the level of information provided should be 'proportionate to the scale and nature of the development proposed'. This policy is vague and unclear for applicants as to what exactly the Council are expecting developments to deliver and what supporting information needs to be provided with applications. This could very easily result in an entirely ineffective policy. The policy is entirely open to interpretation, there is no clarity as to what 'baseline' sustainability is expected or indeed what weight and support will be afforded to development that goes beyond the level of sustainability that the Council are expecting to be delivered. Policy SP5 misses the opportunity to encourage sustainable development by its vague nature.

	It is suggested that the policy is amended to provide clarity on what is expected to be provided as part of a planning application. The policy should also note that weight and support will be afforded to development which exceeds sustainability standards.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Policy SP5 should be amended to include: 'Positive weight will be afforded to development that demonstrates to the Authority that exceeds the required sustainability standards'
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Churchill Retirement Living Ltd (Represented by Planning Issues Ltd)
Consultee Full Name	Churchill Retirement Living Ltd
Consultee Organisation	Churchill Retirement Living Ltd
Agent Full Name	Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Comment ID	PS950
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2040 is commendable and detailed at length in the justification to <i>Policy SPS</i>.</p> <p>The wording of the policy requires all new development to achieve 'net zero operational carbon' from the point of adoption.</p> <p>It is our view that the stepped approach to net zero in the Building Regulations is more pragmatic, as it allows developers appropriate time to suitably amend their designs and specifications in an efficient way and for the cost of energy efficiency technologies to fall.</p> <p>Were the Council to seek net zero from new development from the point of the Local Plan's adoption then we would respectfully remind the Council that the PPG states that "<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>" (Paragraph: 002 Reference ID 10-002-20190509)</p> <p>Appropriate uplift to build costs for delivering net zero embodied carbon should be allowed for in the forthcoming Local Plan Viability Assessment.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beftonforth Ltd (Represented by PSP Consulting)
Consultee Full Name	Beftonforth Ltd
Consultee Organisation	
Agent Full Name	Patrick Gurner
Agent Organisation	PSPconsulting
Comment ID	PS1514
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:01:00
Attached Files	PSPconsulting on behalf of Beftonforth Ltd REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	All as set out in detail in the Local Plan Review Documentation
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>[See attached document for full accompanying statement - PSPconsulting obo Beftonforth Ltd REDACTED]</p> <p>Please refer to Section 3 and Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 3 - POLICY REVIEW INCLUDING DRAFT POLICIES DM43 AND DM42</p> <p>National Planning Policy Framework (NPPF July 2021)</p> <p>The National Planning Policy Framework (NPPF) has a presumption in favour of sustainable development at its heart. Of particular relevance to the potential for growth in rail use at the Theale Railhead, Beftonforth have highlighted below particular elements of National Policy which support the Government's intention to increase the use of rail freight to assist in achieving national decarbonisation targets and deliver net-zero.</p> <ul style="list-style-type: none"> • At NPPF paragraph 106(c), planning policies should: <ul style="list-style-type: none"> “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;” • At NPPF paragraph 106(e) planning policies are also required to: <ul style="list-style-type: none"> “provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy...” • Footnote 44 on page 31 confirms that: <ul style="list-style-type: none"> “Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight,” [our underlining]. • NPPF paragraph 83 is clear that in the context of building a strong, competitive economy: <ul style="list-style-type: none"> “Planning policies and decisions should recognise and address the specific locational requirement of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” [our underlining]. • At NPPF paragraph 152 In the context of meeting the challenge of climate change, the planning system should help to: <ul style="list-style-type: none"> “shape places in ways that contribute to radical reductions in greenhouse gas emissions...” • And NPPF paragraph 153 requires that: <ul style="list-style-type: none"> “Plans should take a proactive approach to mitigating and adapting to climate change...” • Similarly, NPPF paragraph 154 confirms that new development should be planned in ways that: “can help reduce greenhouse gas emissions...”

	<p>The consultation on the December 2022 proposed updates to the NPPF, which run to March 2023, do not propose any material change to the NPPF paragraphs quoted above.</p> <p>The Planning Practice Guidance (PPG) on Climate Change gives advice at paragraph 003 on “How the challenges of climate change can be addressed through the Local Plan”. The Guidance states that “there are many opportunities to integrate climate change mitigation and adaptation objectives into the Local Plan. Sustainability appraisal can be used to help shape appropriate strategies in line with the statutory duty on climate change and ambition in the Climate Change Act 2008.</p> <p>Examples of mitigating climate change by reducing emissions:</p> <ul style="list-style-type: none"> • Reducing the need to travel and providing for sustainable transport;” <p>Draft Policies SP1 ‘Spatial Strategy’; SP5 ‘Responding to Climate Change; and SP23 ‘Transport’</p> <p>Consistent with the above National Policy advice, Bectonforth consider that the following Draft Local Plan Policies should be amended as below:</p> <ul style="list-style-type: none"> • Draft Policy SP1 ‘Spatial Strategy’ should be extended to include opportunities to increase and expand the provision for the movement of freight by sustainable means. • Draft Policy SP5 ‘Responding to Climate Change’ listed criteria should also include an item to demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured. • Draft Policy SP23 ‘Transport’ should similarly include a requirement for development that generates a transport impact to demonstrate that all options to secure modal shift from road to more sustainable transport means have been explored. • The Supporting Text to Draft Policy SP23 should include a new paragraph encouraging modal shift for the movement of freight from road to rail.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>All as set out in detail in the Local Plan Review Documentation</p>
<p>4. Proposed Changes</p>	<p>Please refer to Section 4 of the accompanying statement prepared by PSP on behalf of Bectonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 4 - REQUIRED CHANGES TO MAKE THE PLAN SOUND</p> <p>With reference to Response Form Question 2, in the absence of any wording in the Regulation 19 Submission Draft Local Plan expressly supporting the growth of the Theale Railhead, and with wider omissions with respect to the Spatial Strategy, Climate Change Policy and Transport Policies, the Submission Draft Local Plan is not considered to meet the tests of Soundness for the reasons identified above and summarised below:</p> <p>The Submission Draft Local Plan is not positively prepared since it does not respond to identified need and it does not facilitate sustainable development in accordance with National and Regional Policy.</p> <p>The Submission Draft Local Plan is not justified since it fails to deliver an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives.</p> <p>There is no clear audit trail as to why this approach has been adopted and changed from the adopted Development Plan and from earlier stages of the current Local Plan Review. The Sustainability Appraisal fails to consider the increased use of rail freight consistent with National and Local Policy, when the evidence points to the need to support the growth in rail freight provision. The Sound approach and reasonable alternative would be to provide supporting text which supports the growth of rail freight at Theale and to have this expressed within the Policy itself.</p> <p>The Submission Draft Local Plan is not Consistent with National Policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site-specific considerations of the Theale Rail-Road Transfer Site under Policy DM43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</p> <p>Changes required to make the West Berkshire Regulation 19 Proposed Submission Draft Local Plan Sound</p> <p>With reference to Response Form Question 4 changes have been identified below which are considered necessary to make the Submission Draft Local Plan Sound. The changes are required to ensure that the Submission Draft Local Plan is positively prepared, justified, and consistent with National Policy.</p> <p>To address the concerns raised in these representations with regard to Soundness, and specifically the failure of the Submission Draft Local Plan to appropriately identify and support modal shift in the context of the movement of freight, changes are sought below with respect to spatial strategy, climate change and transport policies. Additionally, in site specific terms, express support for growth of the Rail-Road</p>

	<p>Transfer Site at Theale is sought. The specific changes required to make the plan 'Sound' are shown below in red underline or strike through.</p> <p>It is confirmed that the schedule of required changes set out below, has been jointly drafted and agreed between Network Rail, Bectonforth and the Englefield Estate.</p> <p>(b) Policy SP5, Responding to Climate Change</p> <p>"The principles of climate change.....Depending on the nature and scale of proposals, development will be expected to satisfy the following criteria:</p> <p>a. To withstand... b. To take advantage.... c. To achieve net zero.... d. To achieve the highest... e. To generate and ... f. To provide for sustainable forms of vehicular and personal transport... <u>g. To demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured.</u> g.h. To enable</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To explain in detail to the Inspector, the importance of the Local Plan Review including the opportunity for the growth of rail freight at the Theale Railhead.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gleeson Strategic Land Ltd
Consultee Full Name	Mr Peter Rawlinson
Consultee Organisation	Gleeson Strategic Land Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1120
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	03/03/2023 14:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Gleeson supports the Council's intention to improve the resilience of land, buildings and existing future communities to the opportunities and impacts arising from climate change. However it is considered that the most effective way for this goal to be achieved will be through following the national Future Homes Standard that will be delivered through building regulation changes, which will require new homes to be zero carbon ready by 2025. There is no need to replicate this requirement in Policy SP5 (c) and (d), and it is therefore considered that these points should be removed from Policy SP5.</p> <p>To summarise the above points, Gleeson Land supports the overall intentions of the Local Plan Review to deliver sustainable development for the district, the settlement hierarchy and the spatial strategy. However, it is considered that there should be a requirement for an earlier review of the Local Plan should any changes arise in the AWE Burghfield and AWE Aldermaston DEPZ's or the capabilities of the Emergency Planning Services that may change the acceptability of new residential development in areas currently covered by the DEPZ. In addition the housing target should be more clearly defined at the upper end of the given range. It should be clear throughout the whole Plan that the housing target is for 9,146 dwellings (538dpa), plus the 230 dwellings of unmet need from Reading Borough Council. This unmet need should be provided for in new site allocations now, rather than being left for a later review. Serious consideration should also be given to increasing the overall housing target further to support the delivery of more affordable homes given the very high need for such homes</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)
Consultee Full Name	Lochailort Newbury Limited
Consultee Organisation	Lochailort Newbury Limited
Agent Full Name	Sarah Ballantyne-Way
Agent Organisation	Lochailort Investments Ltd
Comment ID	PS1400
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We support the ambitions set out in Policy SP5</p> <p>We do however note that the minimum parking standards set out in Policy DM44 entirely conflicts with this policy which requires that:</p> <p><i>The principles of climate change mitigation and adaptation will be required to be embedded into new development, improving the resilience of land, buildings and existing and future communities to the opportunities and impacts arising from climate change. All development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</i></p> <p>Requiring minimum parking standard even in highly sustainable locations clearly conflicts with the above statement, and particularly bullet point f which seeks to reduce car usage.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1552
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>We have reviewed Policy SP5 - Responding to Climate Change and make the following comments.</p> <p>Firstly, to ensure flood risk is assessed against climate change we ask that an additional point is included in the criteria that all developments will be expected to satisfy. This should be added before point i):</p> <p><i>'To assess any future increase in flood risk because of climate change in accordance with policy SP6'</i></p> <p>This is to ensure the policy is fully compliant with National Planning Policy and the associated Planning practice guidance.</p> <p>Secondly, there should be a bullet point about protecting and conserving the water environment - not just in terms of water quality and resources (as in bullet point h), but in terms of protected and important species and habitat this is particularly relevant due to the includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) status'. We suggest the following:</p> <p><i>'To manage and conserve adequate water resources and avoid harming important biodiversity species and habitat.'</i></p> <p>Thirdly, there should be a point about BNG and to have at least 10% at every site to help mitigate against climate change mitigation effects. For instance, Natural Flood Management (NFM) techniques could be used, for example by re-connecting rivers to their floodplains when and where possible. This is to ensure that development provides suitable mitigation and adaptation to climate change, considering the long-term implications for flood risk as well, and safeguards the future resilience of communities and infrastructure to climate change impacts. This is in accordance with Paragraph 149 of the National Planning Policy Framework (NPPF).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>We ask that additional points are included in the criteria that all developments will be expected to satisfy. We suggest the points below.</p> <p><i>To assess any future increase in flood risk because of climate change in accordance with policy SP6.</i> This should be added before point i)</p> <p><i>To manage and conserve adequate water resources and avoid harming important biodiversity species and habitat.</i> This should be added before point h)</p> <p>Thirdly, there should be a point about having at least 10% BNG at every site to help mitigate against climate change mitigation effects.</p> <p>Policy SP5 We reviewed policy SP5 and note Paragraph 5.1 states - <i>The gases emitted such as carbon dioxide, methane and nitrous monoxide have added to our atmosphere and the greenhouse 'blanket' accelerating global temperatures and affecting the climate in ways that could change how we live and our long term behaviours.</i> We believe 'nitrous monoxide' should be 'nitrous oxide'. This should be amended.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to attend the examination for an opportunity to explain the need to adequately assess and mitigate against impact of climate change in the plan. The suggested wording for example will ensure developments are not at risk of flooding as well as ensure the protection important biodiversity species and habitat.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1606
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Policy SP5 (Responding to Climate Change) – Thakeham supports the need to respond to climate change and we have set out own targets in this regard that exceed Government objectives, as highlighted above. However, Thakeham does not support the creation of bespoke policies and suggests the most effective way of achieving the national ambition to be net zero by 2050, alongside delivering the homes required to meet the needs of the country, is through the application of building regulations and the Future Homes Standard, and any opportunities for developers to exceed this. Creating bespoke policies which may require different building techniques is likely to only restrict the delivery of homes, therefore Thakeham does not support parts C and D of Policy SP5.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	<p>Yes</p>

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1675
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>4. Comment on DM policies</p> <p>4.1 Policy SP5 'Responding to Climate Change – we support the general aim of this policy, however the wording should require conformity with Building Regulations in force at the time of development coming forward due to the period of time covered by the LPR period. There is vagueness within the policy relating to the viability of energy efficiency levels. This provides uncertainty for developers and should be re-worded.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Home Builders Federation
<p>Consultee Full Name</p>	Mark Behrendt

Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1681
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

Please give reasons for your answer	<u>Part c and d are unsound as they are not consistent with national policy relating to technical building standards.</u> Our detailed concerns regarding the requirement for new residential to achieve net zero operational carbon are set out in our comments on DM4 which sets out the Council's policy approach to achieving this. The HBF recognises the need for new homes to be more energy efficient and support the national ambition to be net zero by 2050. However, we consider that the most effective way of achieving this alongside delivering the homes required to meet the needs of the country is through the application of building regulations and the Future Homes Standard. This will ensure that new homes are zero carbon ready from 2025 with net zero being achieved through the decarbonisation of the national grid. We would therefore suggest that SP5 is amended to remove point c and d which the HBF does not consider to be consistent with national policy.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1411
Chapter / Policy / Appendix Number	Policy SP 5
Chapter / Policy / Appendix Title	Responding to Climate Change
Order	24
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes	No

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 6 Flood Risk

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cairns, Hilary
Consultee Full Name	Ms Hilary Cairns
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS94
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 16:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Regarding the proposed and reduced plan to develop an area of North East Thatcham with 1,500 houses up to the year 2039. Thatcham has had many developments over the years (from 1972 when we moved here); in all these developments infrastructure has been sorely lacking, roads such as Tull Way and Floral Way can hardly be called infrastructure, yet they are there to ease the movements from the most recent developments, yet in Policy SP17 it is stated that the mitigation of the development impact on the highways network - this is not shown and at the February 2019 meeting there was going to be no improvement to Harts Hill Road, which already carries a heavy amount of traffic.</p> <p>Your policy also states that priority habitats and ecological features will be protected, and yet you also state that all people will have access to the area's land, very hard to achieve both.</p> <p>Policy SP6 states that flood risk for the site will not be increased, but does not state that flood risk to surrounding areas will not be increased, which is almost impossible to achieve with such a huge number of hard standings with houses on. It is also stated that the benefit to the community will outweigh the risk of flooding. That is hardly something that will endure you to all the people whose houses flooded in previous years and who either can no longer insure or pay increased premiums.</p> <p>Floral Way was supposed to be the boundary of North East Thatcham. It would be preferable to build a new secondary and primary school, with leisure centre on part of the proposed site and develop the current Francis Bailey Primary School, Kennet Secondary School and the Kennet Leisure Centre on what is a brownfield site that is much closer to the heart of Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Floral Way was supposed to be the boundary of North East Thatcham. It would be preferable to build a new secondary and primary school, with leisure centre on part of the proposed site and develop the current Francis Bailey Primary School, Kennet Secondary School and the Kennet Leisure Centre on what is a brownfield site that is much closer to the heart of Thatcham.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Hoddinott, Keith</p>
<p>Consultee Full Name</p>	<p>Keith</p>

	Hoddinott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS482
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

<p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Schedules (Sections) 3 (SUDS) & 42 (Sewers). Flood & Water Management Act 2010.</p> <p>You will be aware from past correspondence of my efforts to get the Government to implement the above legislation. I have now exhausted all the direct contact with departments, agencies & organisations to pressure DEFRA to ABIDE by Government original intentions, & the Parliamentary Scrutiny Cilee's recommendations (2017), & the Food & Rural Affairs dee. (HC1 70— Sept. 2020) conclusions; & show some "Duty of Care" to home owners. The LGA will not accept my representations as an individual, but only from one of its local authority members.</p> <p>Therefore, I am formally requesting that West Berks Council makes representations to the LGA to pressure Government to implement this legislation immediately. This will enable the mandatory adoption of SUDS & Sewers, & close the loophole in planning procedures, which large developers are using to the legal, financial & environmental detriment of homeowners.</p> <p>Bracknell-Forest Council have gone some way in their policy towards SUDS provisions on new developments. Therefore why can not WBC do likewise. G.Eaton (Dept.for Levelling-up, Hsg. &Communities) has said in correspondence that LA's & Water Co.'s should be more robust at the early planning stages to require infrastructures to be adopted.</p> <p>This is not only a serious National issue, but of particular concern to the Thatcham Flood Forum. They are concerned that unregulated design, construction & future maintenance of private SUDS & sewer infrastructures on proposed developments north of the town on the rising escarpments up to Cold Ash & Bucklebury could in the future compromise & prejudice the integrity of the recent Flood Alleviation schemes being undertaken by WBC.</p> <p>I have spoken informally to some Thatcham & Newbury Town Councillors, who are sympathetic to the implementation of this legislation.</p> <p>There are many nuances & unintended legal, financial & environmental consequences to the delays in the Government's inaction on these issues, which have been outlined in previous correspondence. Therefore, I would be willing to discuss these issues with yourself & members.</p> <p>Recent correspondence from the Dept. for Levelling Up, Housing & Communities suggest that Councils should be expected to be more robust in their policies for the provision of infrastructures including flood risk management & sewerage infrastructures.</p> <p>An opportunity of the SUDS infrastructures is that they could be used as an integrated part of open space areas, developed to provide planting & biodiversity. Hence the need for such areas to be adopted & maintained by the Council.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stratfield Mortimer Parish Council
Consultee Full Name	Lynn Hannawin
Consultee Organisation	Stratfield Mortimer Parish Council
Agent Full Name	Lynn Hannawin
Agent Organisation	
Comment ID	PS584
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 10:22:43
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	
* Yes	
* No	

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	With respect to run-off on pre-developed sites the maximum discharge rate equivalent to 50% of the exiting 1 in 100 year runoff rate is not acceptable. There is normally an logarithmic relationship between probability and run-off data. Thus 50% of the existing runoff rate has a priority of about 0.1 i.e. is a 1 in 10 year event. This is unacceptable and could lead to relatively frequent flooding. A 1 in 50 year runoff rate would be much more appropriate
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holybrook Parish Council
Consultee Full Name	Pamela Kirkpatrick
Consultee Organisation	Holybrook Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS634
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other	Web

* SMS * Web * Unknown	
Response Date	03/03/2023 11:32:49
Attached Files	Local_Plan_Review_HPC_Response_02_2023.pdf (4)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Holybrook Parish Council would like to see the floodplain in the Eastern Area protected and, ideally, made into conservation areas. It is noted that the plan encourages Flood Risk mitigation measures but, in practise, these are rarely upheld. Many roads are flooded and stay that way for long periods of time because drainage trenches are not dug and those that are, are not maintained often being overgrown and full of litter. The north side of the A4 Bath Road being a perfect example of this issue.</p> <p>The Holy Brook is owned by several private landowners but part is also owned by West Berkshire Council. The Holy Brook river is integral to the history of the Parish and is a highly valued asset yet the management and protection of this asset is not mentioned or referenced in the Plan.</p> <p>Preserving the floodplain and maintenance of the Holy Brook should be an integral part of WBC's Climate Change Policy.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No

Please give reasons for your answer	The Parish Council has previously raised concern with lack of mention of the floodplain and Holy Brook river in the Parish of Holybrook and this has not been added to or addressed in the Local Plan.
4. Proposed Changes	Include the Holy Brook river and floodplains in Holybrook to the plan.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes No
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS949
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". Flooding from sewers should therefore also be referenced in Policy SP6 for clarity.</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewerage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximize the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: <u><i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></u>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS785
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson response REDACTED' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP6 – FLOOD RISK (and Sustainable Drainage – SuDS)</p> <p>Like many other Local Plans, I would prefer SuDS to have its own SP, rather than being a DM or SPD. My research is too long to go into here but suffice to say Planning Officers have had little attention to Flood Risk and SuDS, with the SuDS SPD often not quoted as a Material Consideration.</p> <p>The LLFA has been under resourced and does not look at Minor Developments, even though Newbury is identified by the EA as a Flood Risk Area, and the SuDS SPD 2018 states that ALL Planning Applications in Newbury should include a Surface Water Drainage Statement or Strategy (SWDS) these are often Not demanded at Validation Stage and were not on the list of Documents required at Validation. NB. The link to this within the Submission Document does not work.</p> <p>The EA Map system for Developers/Planning to look up flood risk does <u>not include</u> the Surface Water Risk Maps or Groundwater Risks Maps so having a deficient search tool is not helpful.</p> <p>Hence many developers do not take RoFSW from Upstream into account when calculating SuDS and groundwater impacts are often a mystery. As it is quite possible to get more than 10 units on less than 1 hectare sometimes Flood Risk from Pluvial, Groundwater & Sewage can go un-discovered or un-challenged.</p> <p>Many Planning Officers are not fully aware of the SuDS SPD 2018 and comment on Flood Risk in Officers Reports is often sketchy, and until I started to raise awareness local Councillors had little knowledge.</p> <p>The Actual Policy seems to repeat much of which is, thankfully, now part of the NPPF & the Flood Risk PPG so if change is made will this Policy need updating? The Policy does not give an indication on the absent Methodology for Cumulative Impact Assessment from ALL SOURCES, that is required by the NPPF Chpt 14 Para 160. Assessing Cumulative Impact Of Developments On Flood Risk In (a) Catchment Area – CIOD OFRICA – is covered under recent addition to the SFRA Level 1 – via Addendum 1-</p>

	however it does not include the Methodology. The absence of this caused residents not to be able to move into new properties at Shaw Valley.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Community Football Club (Represented by DPDS Consulting Group)
Consultee Full Name	Newbury Community Football Club
Consultee Organisation	Newbury Community Football Club
Agent Full Name	Les Durrant
Agent Organisation	DPDS Ltd
Comment ID	PS904
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Our client supports the strict application of the sequential approach to sites within Flood Zones 2 and 3, along with the requirement for a site-specific flood risk assessment for all developments located within Flood Zone 2 or 3.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincents Lane (Represented by TOWN)
Consultee Full Name	Pincents Lane
Consultee Organisation	Pincents Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1356
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincents Lane) Full Rep.pdf TOWN (Pincents Lane) App 8 Flood Risk.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The site Promoters have commissioned Civic Engineers to undertake a review of the Strategic Flood Risk Assessment published by West Berkshire Council given the recent changes in advice under the National Planning Policy Framework 2021 (paragraphs 161- 162); together with a review of the very recent Sequential Test Report (2023). Civic Engineers' study is entitled Review of West Berkshire Council Local Plan 2022-2039 Proposed Development Sites Against Flood Risk and is attached at Appendix 8.</p> <p>The Civic Engineers study highlights a number of errors in the production of the Strategic Flood Risk Assessment and Sequential Test, including:</p> <ul style="list-style-type: none"> • No consideration is given as to whether sites are in Flood Zone 2 as distinct to Zone 1 or Zone 3 plus climate change; • The use of percentile limits (less than 10% and 75% of area of site at risk from certain flooding events) which have been used without any clear quantitative explanation of how these figures have been discerned ,as they are not referenced in the Planning Policy Guidance (PPG). <p>Furthermore, the "...sequential test found that four proposed residential development sites proposed allocated in the local plan were highlighted as having flood risks from one or more sources. The proposed development site at Pincents Lane, Tilehurst was found to have no flood risks. This is in itself demonstrates that these allocated sites do not comply with the sequential test in accordance with the NPPF. Moreover Pincents Lane is another site with a lower probability of flood risk which should be allocated in the local plan ahead of high risk sites."</p> <p>This failure to demonstrate the allocations comply with the sequential test is a significant error which demonstrates that the R19 LPR plan should not be found sound, since it is inconsistent with NPPF 161 & 161. As such fails the tests of soundness set out in NPPF paragraph 35. Moreover NPPF para 11 b) i) makes clear that flood risk policy is one which provides a strong reason for restricting the overall scale, type or distribution of development. The evidence base does not demonstrate that such an exercise has been undertaken to show for example how levels of flood risk at North East Thattham ought properly to restrict the physical extent or quantum of development.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Full Rep • Appendix 8 - Civic Engineers: Review of Proposed Development Sites Against Flood Risk
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1412
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)
Consultee Full Name	Lochailort Newbury Limited
Consultee Organisation	Lochailort Newbury Limited
Agent Full Name	Sarah Ballantyne-Way
Agent Organisation	Lochailort Investments Ltd

Comment ID	PS1398
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	It is noted that Policy SP6 requires that the Sequential Test is strictly applied in all areas of flooding. We have no objection to this policy in principle however a large part of Newbury is located within the Flood Zone, including part of the Kennet Centre. As such, a Sequential Test is required for its redevelopment, and for any other sites within the Flood Zone.

	<p>However, the policy also notes that allocated sites will have been subject to the Sequential Test at the plan-making stage. Given the importance of the Kennet Centre to Newbury town centre, in respect of its size, current under-use and potential, alongside its highly sustainable location, it is entirely suitable to be allocated, as a large, town centre site within a predominantly rural local authority.</p> <p>The requirement for a Sequential Test as part of the planning application process, when a site allocation would forgo such need, on a site which is wholly suitable for redevelopment (with no objection to the recent application from the Environment Agency) results in additional and unnecessary bureaucracy and results in a Local Plan that fails to meet the over-arching soundness requirements of the NPPF in terms of delivery.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1501
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:09:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework. This policy sets out a clear intention to reduce the impact of flood risk: this links to Policy SP5 which seeks climate change mitigation and adaptation to be embedded into new development. However, as with Policy SP5, Policy SP6 does not set out that weight should be afforded to development that improves flood risk on site or improves flood risk on neighbouring sites. Developments are required to mitigate flood risk but there is a missed opportunity to encourage new developments to reduce flood risk overall. Weight should be afforded to developments that can reduce flood risk.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Policy SP6 should be amended to include: 'Positive weight will be afforded to development that reduces flood risk on site and/or to land outside the development boundary'

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1553
Chapter / Policy / Appendix Number	Policy SP 6
Chapter / Policy / Appendix Title	Flood Risk
Order	26
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>We have reviewed Policy SP6 - Flood Risk and to ensure the policy adequately complies with national policy, a few amendments will need to be made to the policy text.</p> <p>Please refer to section 4 for the suggested changes/amendments to policy text</p> <p>We reviewed Policy SP6 and the penultimate paragraph of Policy SP6 states "...in accordance with the SuDS Supplementary Planning Document, best practice, and the Non-statutory Technical Standards for Sustainable Drainage (19)()." It appears there a reference missing at the end of this sentence hence the empty brackets.</p> <p>Regarding policy SP6, we appreciate the use of Natural flood management (NFM), measures as it will ensure that development provides suitable mitigation and adaptation to climate change, taking into account the long-term implications for flood risk. It would also assist in safeguard the future resilience of communities and infrastructure to climate change impacts. This is in accordance with Paragraph 149 of the National Planning Policy Framework (NPPF).</p> <p>Developments should encourage NFM measures and look at opportunities for river restoration and enhancement, and projects which reconnect rivers with their floodplains. NFM measures such as backwater creation, de-silting, de-culverting and naturalising the channel through inchannel habitat enhancements and removal of structures should be sought. These concepts should be incorporated into plans for new development from an early stage.</p> <p>Irrespective of the above stated benefits, it should be understood however that NFM measures may not always be appropriate/possible. This should be acknowledged.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>We have reviewed Policy SP6 - Flood Risk and to ensure the policy adequately complies with national policy a number of amendments will need to be made to some of the policy Texts and we suggest the following changes/amendments to policy texts.</p> <p>We suggest adding the text below to Point 'd' of Policy SP6 <i>'The development will be safe for its lifetime' and not increase flood risk elsewhere.'</i></p> <p>We suggest Paragraph 6 of Policy SP6 should be reworded from: <i>"In applying the Sequential Test, where development has to be located in flood risk areas, it should be demonstrated that..."</i></p>

	<p>To; <u>'If the sequential test shows that it isn't possible for an alternative site to be used and therefore development has to be located in a flood risk area, it should be demonstrated that:..'</u></p> <p>Paragraph 8 of Policy SP6 states "Where an Exception Test is required, in accordance with national policy and guidance, this should demonstrate how flood risk would be managed on site, including that the sustainability benefits of the site outweigh the flood risk and that the development will be safe for its lifetime, taking into account the vulnerability of its users and that it will not increase flood risk elsewhere."</p> <p>We suggest this is reworded to the following text for clarity:</p> <p><u>'In addition to the sequential test, the exception test must be applied in certain situations according to national policy. This includes highly vulnerable development in flood zone 2, essential infrastructure in flood zone 3a or 3b, and more vulnerable development in flood zone 3a. The exception test should demonstrate how flood risk would be managed on site so that the development is safe taking into account the vulnerability of its users, and that it will not increase flood risk elsewhere. The exception test will also need to show that the sustainability benefits of the development to the community outweigh the flood risk.'</u></p> <p>Point 'p' of Policy SP6 states "Natural flood management measures can be implemented".</p> <p>While we support the implementation of Natural flood management measures, it may not always be appropriate/possible to provide these. We suggest this is reworded and suggest the following text;</p> <p><u>'Natural flood management measures can be implemented wherever possible.'</u></p> <p>Paragraph 5.17 of Policy SP6 states: "The sequential approach to the layout of a development site can reduce the risk of flooding from all sources and not increase flood risk overall, both off and on site. This approach also ensures that the most vulnerable development is located within the areas of lowest risk of flooding."</p> <p>We suggest this is reworded and suggest the following text; <u>'The sequential approach should be taken when determining the layout of a development site, meaning the most vulnerable development should be sited in the areas of lowest flood risk within the site.'</u></p> <p>We reviewed Policy SP6 and paragraph 1 states "Within Flood Zones 2 and 3 (and also on sites of 1 hectare or more in size, and in other circumstances as set out in the NPPF)". We note a minor typo in the form of an omitted closed bracket as above.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to attend the examination for an opportunity to explain the need to include the suggested wording to ensure developments in West Berkshire are not at risk of flooding as well as adheres to national policy.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Policy SP 7 Design Quality

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS192
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Point c of paragraph 130 of the NPPF requires planning policies and decisions to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).</p> <p>Accordingly, whilst we support the requirement to strengthen a sense of place through high quality locally distinctive design and place shaping, we do not consider it is appropriate to refer to the National Design Guidance (2021).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
<p>4. Proposed Changes</p>	We would suggest that local level design guidance is referenced and the now deleted design principles shown in the tracked changes version of the draft policy are re-inserted to ensure that design reflects local character, in accordance with the NPPF.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	N/A
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Saunders Family (Represented by Southern Planning Practice)
<p>Consultee Full Name</p>	Saunders Family
<p>Consultee Organisation</p>	Saunders Family
<p>Agent Full Name</p>	Alice Drew
<p>Agent Organisation</p>	Southern Planning Practice Ltd
<p>Comment ID</p>	PS238
<p>Chapter / Policy / Appendix Number</p>	Policy SP 7
<p>Chapter / Policy / Appendix Title</p>	Design Quality
<p>Order</p>	28

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We support the amendment to Policy SP7 which sets out that new development should reflect the National Design Guide (2021).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS600
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>12. SP7 – first sentence. We object to this as the Plan would not be in keeping with Theale's character.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holybrook Parish Council
Consultee Full Name	Pamela Kirkpatrick
Consultee Organisation	Holybrook Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS636
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 11:32:17
Attached Files	Local_Plan_Review_HPC_Response_02_2023.pdf (3)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	HPC welcomes this policy but would like to see it strengthened to state: <i>“cut and paste” design of substantial housing developments will not be permitted</i> . By way of example, the Bellway sites at Dorking Way, Calcot and Old Forest Road, Wokingham are identical in format and yet are in very different localities. In addition, the permitted Dorking Way development is in stark contrast to the existing character and design of Holybrook detracting from the Parish’s previous distinctive design and it changes the shape and character of the area.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	The Parish Council has raised many concerns with cut and paste design and this style of planning is strongly opposed to in the NPPF. These concerns have not been addressed or mitigated.
<p>4. Proposed Changes</p>	Include the following wording: <i>“cut and paste” design of substantial housing developments will not be permitted</i>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Stratfield Mortimer Parish Council
<p>Consultee Full Name</p>	Lynn Hannawin
<p>Consultee Organisation</p>	Stratfield Mortimer Parish Council
<p>Agent Full Name</p>	Lynn Hannawin
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS585
<p>Chapter / Policy / Appendix Number</p>	Policy SP 7
<p>Chapter / Policy / Appendix Title</p>	Design Quality
<p>Order</p>	28

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:24:17
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	5.30f Refers to local communities taking responsibility for the upkeep of their public spaces. This would appear to be a move from the usual maintenance by local authorities. If parish councils are to lead such maintenance, there needs to be consultation on how this is to be achieved and financed
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS786
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP7 – DESIGN QUALITY / DESIGN CODES</p> <p>Again, not clear whether they will adopt the <u>National Design Codes</u> AND the <u>NEW National MODEL Design Codes</u> in full or whether they are going to write their own as demanded by the July 2021 NPPF.</p> <p>And whether the Old Design SPD and incumbent individual policies of 2006 will become defunct? Likewise the fact that the Newbury Conservation Area Appraisal is still under negotiation puts parts of this Policy in the 'sheep' category, especially as some of the links don't work and 5.35 there is no list of Documents required at Validation stage of a PA. When I last gave feedback the Validation List of Documents did not include a Surface Water Drainage Statement which the SuDS SPD 2018 says should be submitted with every planning application etc. etc</p> <p>The Newbury Society were cut out of the process for Designing the revised Newbury Conservation Area when Consultants came onboard. And the deadline for rushing through the Newbury Conservation Area Appraisal is not conducive to good decision making and one can only assume the rush after years of non-action is so that it can feature in this plan?.</p> <p>As a minimum this SP7 should state which of the new and old National Codes it is going to comply with, what will happen to old Policy, and list the other Policies within the Plan that will input into overall Design Quality.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rectory Homes Ltd
Consultee Full Name	Steven Kerry
Consultee Organisation	Rectory Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS755
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:09:00
Attached Files	Rectory Homes REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p><i>[For full response see attached document]</i></p> <p>We support the amendments which streamline the policy including removal of a long list of separate design criteria. We agree that development proposals should refer to the National Design Guide, National Design Codes, or any local design guidance documents when seeking advice during the initial design phase of a scheme. As long as the adopted design guides are clear and justified in terms of the advice that is presented, it is considered this is a more effective way of assessing development proposals. This will also assist the Government's ambition to streamline local plans.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1185
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	Yes

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We note and do not object to the changes to this policy since Reg 18.</p> <p>However, we suggest the Council considers referring to design guides or codes, notwithstanding the possibility that "community planning documents" may include such guides or codes.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well- designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans, <u>design guides or codes</u> and relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>TA Fisher & Sons Ltd (Represented by Pro Vision)</p>
<p>Consultee Full Name</p>	<p>TA Fisher & Sons Ltd</p>
<p>Consultee Organisation</p>	<p>TA Fisher & Sons Ltd</p>
<p>Agent Full Name</p>	<p>Miss Katherine Miles</p>
<p>Agent Organisation</p>	<p>Pro Vision Planning & Design</p>
<p>Comment ID</p>	<p>PS1367</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 7</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Design Quality</p>
<p>Order</p>	<p>28</p>
<p>Submission Type</p>	<p>E-Mail</p>

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	02/03/2023 09:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	This policy has been amended to remove the design criteria; some design criteria would be useful in helping developers to ascertain the design approach that is expected by the LPA. Notwithstanding this comment, our client, T A Fisher, delivers a very high-quality product. Their philosophy is to build to a standard, not to a price. This quality can be seen in their existing scheme in Mortimer, which has been well-received locally. Working with the local community to achieve a scheme we can all be proud of, is something that T A Fisher would seek to replicate at MOR005.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1711
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Reference within this policy to 'relevant community planning documents' is problematic, as the phrase is not considered to relate to any specific identified set of considerations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>It is recommended that the second paragraph of this policy is amended in accordance with the below:</p> <p>i) Development proposals will be expected to show how they have responded positively to both national and local design At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans and relevant <u>material considerations</u> community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development</p>
<p>6. Notification of Progress of the Local Plan Review - The</p>	<p>Yes</p>

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1614
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Policy SP7: Design Quality</p> <p>Reference within this policy to 'relevant community planning documents' is problematic, as the phrase is not considered to relate to any specific identified set of considerations.</p> <p>Furthermore, Sovereign notes the Council's commitment to creating a 'sense of place' in new developments, which 'is about ensure that development responds in a holistic way'. Sovereign, as an organisation, is fully committed to the same approach, which is borne from our own Homes and Place Standard ('HPS'). Sovereign's HPS marks the organisation's commitment to building and maintaining good quality homes and better places to live. Whilst we have always striven for high standards in our developments, this new approach will underpin how we invest in our homes and how we build new communities.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation</p>

	of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities. Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.
4. Proposed Changes	It is recommended that the second paragraph of this policy is amended in accordance with the below: i) Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans and relevant material considerations community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1413
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1502
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework.</p> <p>New development is expected to be high quality, however there is no reference to the weight that should be afforded to good design in decision marketing. The Framework identifies that great weight should be afforded to good design; adding significant emphasis to the importance of high quality 'beautiful' design. Policy SP7 does not go far enough to encourage developments to deliver excellent design and improve the visual quality of sites/developments.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Policy SP7 should be amended to include:</p> <p>'Positive weight will be afforded to development that delivers excellent design and improves the overall visual quality of the site.'</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1420
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	Yes

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We concur with the importance of 'sense of place', but feel that there is scope to be more ambitious in stating acceptable design quality. The term 'high quality' is used in this policy, but needs specific definition in order to enable enforcement. In addition, under paragraph 5.30 sub paragraph h, we feel that there needs to be specific mention of increased home working within the area of 'functionality'</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)</p>
<p>Consultee Full Name</p>	<p>Newbury & Crookham Golf Club and Chartfield Homes</p>
<p>Consultee Organisation</p>	<p>Newbury & Crookham Golf Club and Chartfield Homes</p>
<p>Agent Full Name</p>	<p>Jonathan Walton</p>
<p>Agent Organisation</p>	<p>Opus Works</p>
<p>Comment ID</p>	<p>PS1293</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 7</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Design Quality</p>
<p>Order</p>	<p>28</p>
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	<p>E-Mail</p>

Response Date	03/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP7 – Design Principles is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes

5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1266
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<i>Policy SP7 – Design Principles is supported</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1555
Chapter / Policy / Appendix Number	Policy SP 7
Chapter / Policy / Appendix Title	Design Quality
Order	28
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We reviewed Policy SP7 and paragraph 5.31 states “<i>New waterside development adjacent to the Kennet & Avon Canal should seek to positively address the water, integrate the towing path and open up access to the water, link the waterside space to the water, make use of the water itself, incorporate access improvements, engage with the benefits of being by the water, and reflect the scale of the local waterway to the wider neighbourhood.</i>”</p> <p>Whilst this is a beneficial placemaking concept, however this appears to contradict the Policy SP6 – Flood Risk on page 29 of having an undeveloped buffer of 10m alongside and on both sides of main rivers (the Kennet & Avon Canal). We suggest that reference is made to this requirement in Policy SP6 in this section of Policy SP7.</p> <p>This is to ensure the provision of ecological corridors and protection of species and habitat which use the riverbanks and the water as required by national policy</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>The provision of an undeveloped buffer of 10m alongside and on both sides of main rivers should be stated in paragraph 5.31 of Policy SP7 as highlighted in the policy text of Policy SP6 to ensure consistency.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to attend the examination for an opportunity to explain the need to ensure consistency where the issue of providing an undeveloped buffer zone of 10 m alongside and on both sides of main rivers. This is to ensure the provision of ecological corridors and protection of species and habitat which use the riverbanks and the water as required by national policy.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>

Policy SP 8 Landscape Character

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heritage Forum
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	Heritage Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS156
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The Berkshire Gardens Trust has a more active role than the draft LPR suggests. It has carried out a survey of historic public parks in Central and East Berkshire, and wishes to extend this to West Berkshire. The Heritage Forum, in consultation with the WBC Heritage Service, will pursue this.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Pick, Anthony</p>
<p>Consultee Full Name</p>	<p>Mr Anthony Pick</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS155</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 8</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Landscape Character</p>
<p>Order</p>	<p>30</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	<p>E-Mail</p>

* Web * Unknown	
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	(i) Maintenance of the landscape will depend on the long term on the owners having both the income and the desire to do so. For major and public landscapes, this is straightforward. For small parcels of land attached to housing estates, diversified ownership is not likely to produce this result.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	A common policy for maintenance of all publically used landscape is needed.
5. Independent Examination - If your representation is seeking a change, do you consider it	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS193
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Whilst we support the objective of conserving and enhancing the diversity and local distinctiveness of the landscape character of the District, we do not consider it necessary for an appropriate landscape assessment to accompany all proposals for development. This would add further cost to householder and small-scale developments which could result in schemes being unviable.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We therefore suggest that this requirement is amended to state "proposals for major development or in areas within or adjacent to protected landscape designations (i.e., the AONB) should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and IEMA Institute of Environmental Management & Assessment".
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS704
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Sandleford Park West (SPW) The principle of Landscape led development outlined in Policy SP8 is generally supported however, reference to the 2019 West Berkshire Landscape Character Assessment could become outdated during the lifetime of the Plan. As such, the wording of the Policy should be amended so that, after the words 'set out in the West Berkshire Landscape Character Assessment (2019)', the words 'or landscape character assessment relevant at the time the application is determined'. This will avoid any ambiguity for developers in terms of which benchmark development is being assessed against.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS601

Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 14. SP8, c. We object to this as Theale already has a 57.3% increase in development and is over scale. 15. SP8, 5.39. We object to this as Theale already has a 57.3% increase in development and this affects the landscape so this conflicts.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS787
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP8 - LANDSCAPE CHARACTER APPRAISALS</p> <p>I am not sure that Town & Parish Councils have had input into these Appraisals, and I personally have concerns that the influences that prevail around the Boundaries between Newbury Clayhill & Cold Ash Parish Council & Shaw-cum-Donnington Parish Council may have come into play.</p> <p>Within the Evidence Base there appears to be no Landscape Character Appraisal for Site Allocation RSA3 – Land at Coley Farm, Stoney Lane, Newbury. As the Site is up on the hillside and currently agricultural land there could be impacts on the views of the hillside. IF LCA has taken place within the Planning Application or for the Appeal then the pages of the WBC web site could do with updating.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>

5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1414
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Support policies
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Liebreich Associates (Represented by Plainview Planning)

Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1504
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework. This policy supports landscape led development, however there is no reference to the weight that should be afforded to developments that provide enhancements to the landscape. This is a missed opportunity to encourage landscape enhancements. The supporting text highlights that one of the key issues facing West Berkshire is the conservation and enhancement of the distinctive local character of both the natural and built historic environment. However, this policy does not support proposals that go beyond 'no landscape harm' again, it is a missed opportunity to deliver landscape enhancements through new development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Policy SP8 should be amended to include: 'Positive weight will be afforded to development proposals that can demonstrate enhancements to the landscape character of the site over the existing'
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1615
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character

Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	DEVELOPMENT MANAGEMENT POLICIES The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response. Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.

	<p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Policy SP8: Landscape Character</p> <p>As currently formulated, the policy requires that all development, of any scale, would need to be supported by an appropriate landscape assessment. This is considered to be unduly burdensome on minor forms of development and may not be appropriate in all cases where major development is proposed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
<p>4. Proposed Changes</p>	<p>To introduce greater flexibility within the policy and avoid unnecessary delays further in the planning process, the following amendments are recommended:</p> <p>i) <u>Where appropriate</u>, Pproposals for development <u>major</u> should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and Institute of Environmental Management & Assessment.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1422
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	Yes

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We note and agree with the Landscape Character Assessment (LCA) that supports this Policy. In particular, the LCA supports no development west of the A34 in Speen Parish. The LCA states 'Conserve the dispersed settled character along the ridge [B4000 from A34 to Stockcross]. Seek to avoid linear development and ensure settlements retain their distinct character and identities. Development should be in-keeping with existing settlement form and vernacular, and should respect the role wider rural landscape makes to Benham Park Conservation Area in particular'.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Historic England</p>
<p>Consultee Full Name</p>	<p>Historic England</p>
<p>Consultee Organisation</p>	<p>Historic England</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1186</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 8</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Landscape Character</p>
<p>Order</p>	<p>30</p>
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	<p>E-Mail</p>

Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We support the proposed policies listed in this representation
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>unless justified to the satisfaction of the Council, that the proposed changes, loss or irreversible damage, and/or addition of new features to the Listed Building and its setting are:</p> <ul style="list-style-type: none"> • Less than substantial in terms of impact/harm on the character and significance of the Listed Building and its setting; and • Is off-set by the public benefit from making the changes, including enabling optimal viable use, and net enhancement to the Listed Building and its

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1267
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<i>Policy SP8 – Landscape Character is supported.</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1295
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character
Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	Yes

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP8 – Landscape Character is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1712
Chapter / Policy / Appendix Number	Policy SP 8
Chapter / Policy / Appendix Title	Landscape Character

Order	30
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	As currently formulated, the policy requires that all development, of any scale, would need to be supported by an appropriate landscape assessment. This is considered to be unduly burdensome on minor forms of development and may not be appropriate in all cases where major development is proposed.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	<p>To introduce greater flexibility within the policy and avoid unnecessary delays further in the planning process, the following amendments are recommended:</p> <p>i) <u>Where appropriate</u>, Pproposals for development <u>major</u> should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and Institute of Environmental Management &</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 9 Historic Environment

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heritage Forum
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	Heritage Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS166
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The general tenor of SP9 is welcomed. A proposal to update the HEAP has been submitted to the Heritage Service, and a response is awaited.</p> <p>The value of each Conservation Area lies in direct proportion to the extent that a Conservation Area Appraisal has been prepared and approved for it. Little or no progress in this regard has taken place. If it is to be rectified, considerably more attention and time will be need to be allocated by the Council, in collaboration with the Heritage Forum, than has been apparent to date.</p> <p>The support of the Council in extending local listing under the agreement with the Heritage Forum is welcomed. This would be assisted by pointing local parish councils towards the Forum when issues are raised regarding planning permission or proposed developments which may impact on heritage assets.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Theale Parish Council
<p>Consultee Full Name</p>	Theale Parish Council
<p>Consultee Organisation</p>	Theale Parish Council
<p>Agent Full Name</p>	Samantha Haywood
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS603

Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 16. SP9. Planning application 16/02850/OUTMAJ for the old sewerage works in Theale. The Archaeological Officer stated "No development/site works/development shall take place within the application area until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall incorporate and be undertaken

	<p>in accordance with the approved statement." The Plan does not mention this. It should be included. It also conflicts with SP9.</p> <p>17. SP9. "Development that would lead to substantial harm.....". Theale High Street is a conservation area and more development would have a detrimental effect on that in regards to pollution, additional traffic etc.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Jardim, Jean-Claude
<p>Consultee Full Name</p>	Jean-Claude Jardim
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS441
<p>Chapter / Policy / Appendix Number</p>	Policy SP 9
<p>Chapter / Policy / Appendix Title</p>	Historic Environment
<p>Order</p>	32
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Web
<p>Response Date</p>	02/03/2023 00:54:43
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	Yes

<p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>5.47 Designated heritage assets in 2020 include:</p> <ul style="list-style-type: none"> • 53 Conservation Areas • Approximately 1900 Listed Building • Approximately 90 Scheduled Monuments <p>The above should contain the exact amount of listed buildings and not approximations, especially considering total net listed builds and Scheduled Monuments are part of the outlined monitoring plan and objectives.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	<p>No</p>

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Society
Consultee Full Name	Mr David Peacock
Consultee Organisation	Newbury Society
Agent Full Name	
Agent Organisation	
Comment ID	PS775
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	Although the role of the HER (Historic Environment Record) receives attention in the Local Plan, we do not see any detail included here to support the role of the council's conservation officers, which (for us) appears crucial if this "positive action" for conservation of "heritage assets" is to take place.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS788
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	No

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP9 - HISTORIC ENVIRONMENT</p> <p>No comment apart from the Objective is called <u>Heritage</u> and both could do with being renamed as Heritage & Historic Environment and both need defining in the Glossary of Terms.</p> <p>The local History Societies and the Newbury Society sometimes feel marginalised in terms of their input to key Heritage & Historic Environment Policy Documents & Planning Applications.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)</p>
<p>Consultee Full Name</p>	<p>James Hole</p>
<p>Consultee Organisation</p>	<p>Yattendon Estates Ltd</p>
<p>Agent Full Name</p>	<p>Ms Patricia Tercerio</p>
<p>Agent Organisation</p>	<p>Barton Willmore now Stantec</p>
<p>Comment ID</p>	<p>PS1151</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 9</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Historic Environment</p>
<p>Order</p>	<p>32</p>

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Our comments to the Regulation 18 Consultation on the Local Plan Review 2020 – 2037: Emerging Draft (December 2020) raised that Policy SP9 did not accord with para 203 of the NPPF. Although we note that part of this Policy was revised, we remain of the view that this policy does not meet the test of soundness because it is not consistent with national policy.</p> <p>Policy SP9 lists the heritage assets to which it should be applied. We note that points f) and g) relate to Local Heritage Assets and, on this basis, Policy SP9 is interpreted as affording the same level of protection to designated and non designated heritage assets. In particular, we note that Policy SP9 states that 'development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7'.</p>

	<p>This does not accord with paragraph 203 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a 'balanced judgement [...] having regard to the scale of any harm or loss and the significance of the heritage asset'. We note that there is no requirement within the NPPF for development that has an impact upon a non-designated heritage asset to maximise opportunities to preserve or enhance it.</p> <p>As such, the Draft Local Plan sets a higher standard than the NPPF on development that affects non-designated heritage assets, which could inhibit the delivery of sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>Based on our comments above, we request that Policy SP9 is revised as detailed below (additions shown underlined deletions shown with a strikethrough). For ease of review we have only included the paragraphs that, in our view, should be subject to change so that Policy SP9 is in line with the NPPF.</p> <p>[...] These heritage assets include:</p> <p>a. Listed Buildings;</p> <p>b. Scheduled Monuments and archaeological sites of national importance;</p> <p>c. Registered Parks and Gardens;</p> <p>d. Registered Battlefields;</p> <p>e. Conservation Areas;</p> <p>f. Buildings, monuments, sites, places, areas and landscapes that have been added to the West Berkshire Local List of Heritage Assets; and</p> <p>g. Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of West Berkshire's heritage and are positively identified on the West Berkshire Historic Environment Record, or through the development management or other planning processes.</p> <p>Development that has an impact upon a <u>designated</u> heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7.</p> <p>[...]</p> <p>Weight will be given to the conservation of the District's designated heritage assets in a manner according to their importance. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</p> <p>[...]</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Donnington Valley Group (Represented by Barton Willmore now Stantec)
Consultee Full Name	Paul Michael
Consultee Organisation	Donnington Valley Group
Agent Full Name	Ms Patricia Terцерio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1346
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	No

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Our comments to the Regulation 18 Consultation on the Local Plan Review 2020 – 2037: Emerging Draft (December 2020) raised that Policy SP9 did not accord with para 203 of the NPPF. Although we note that part of this Policy was revised, we remain of the view that this policy does not meet the test of soundness because it is not consistent with national policy.</p> <p>Policy SP9 lists the heritage assets to which it should be applied. We note that points f) and g) relate to Local Heritage Assets and, on this basis, Policy SP9 is interpreted as affording the same level of protection to designated and non designated heritage assets. In particular, we note that Policy SP9 states that ‘development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset’s significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7’.</p> <p>This does not accord with paragraph 203 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a ‘balanced judgement [...] having regard to the scale of any harm or loss and the significance of the heritage asset’. We note that there is no requirement within the NPPF for development that has an impact upon a non-designated heritage asset to maximise opportunities to preserve or enhance it.</p> <p>As such, the Draft Local Plan sets a higher standard than the NPPF on development that affects non-designated heritage assets, which could inhibit the delivery of sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Based on our comments above, we request that Policy SP9 is revised as detailed below (additions shown underlined deletions shown with a strikethrough). For ease of review we have only included the paragraphs that, in our view, should be subject to change so that Policy SP9 is in line with the NPPF.</p> <p>[...] These heritage assets include:</p> <p>a. Listed Buildings; b. Scheduled Monuments and archaeological sites of national importance; c. Registered Parks and Gardens; d. Registered Battlefields; e. Conservation Areas; f. Buildings, monuments, sites, places, areas and landscapes that have been added to the West Berkshire Local List of Heritage Assets; and g. Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of West Berkshire’s heritage and are positively identified on the West Berkshire Historic Environment Record, or through the development management or other planning processes.</p> <p>Development that has an impact upon a designated heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset’s significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7.</p> <p>[...]</p> <p>Weight will be given to the conservation of the District’s designated heritage assets in a manner according to their importance. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</p> <p>[...]</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1767
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	In reference to paragraph 5.54: The significance of a heritage asset includes its setting. A wording change is merited
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Development proposals likely to affect the significance of a designated or non-designated heritage asset, including the contribution to that significance made by or its setting,
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	Historic England
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1162

Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	We have concerns about the soundness of policy SP9 on the historic environment. We assert that "enabling development" should not appear in the Local Plan, in policy or supporting text, because it deals with circumstances when a proposal for development conflicts with planning policies. If criteria on enabling development were included, a proposal could align with planning policies, thereby

no longer representing enabling development. We recommend deleting the Plan's text on enabling development, or risk being unsound due to conflict with national policy (paragraph 208 of the NPPF).

Also, there is a missing "and" in policy SP9, which should be added or risk the policy being unsound and, again, in conflict with national policy (paragraph 201); see Appendix A for details.

Finally, on policy SP9, as the Council knows, we expressed concern in our response to the Council's Regulation 18 consultation in 2021 that it had only 2 Conservation Area Appraisals (CAAs) for the plan area's 53 conservation areas (CAs). We welcome the Council outlining a programme for CA Appraisals and Management Plans (CAAMPs) in its Local Plan, in paragraph 10.81; but we are very concerned by the resourcing that accompanies this, and the progress made since we highlighted our concerns. Additionally, this matter connects with policy DM9 on conservation areas and has the potential to undermine implementation of policy DM9. To be clear, when read in isolation, we do not regard policy DM9's wording as unsound. However, the Council's commitment to CAAs/CAAMPs needs to be strengthened, which we believe could most effectively be done via policy SP9.

While significant detail on preparing CAAs/CAAMPs is beyond the plan's scope, we propose two steps that the Council could take in its Local Plan which would help to address our concerns (in so far as the Local Plan can influence this matter):

- 1 Currently the Council's programme for CAAs/CAAMPs is outlined in the section on Development Management, as text supporting policy DM9 on Conservation Areas. We recommend moving this (specifically paragraph 10.81) to support policy SP9, as this is a strategic issue about the Council's strategic approach to conservation areas, rather than a development management issue;
- 2 Also, we advise including additional text in policy SP9 that relates to this programme, underlines the Council's commitment to action and supports the implementation of policy DM9. We share the following wording for consideration, expanding on the opening lines in policy SP9, and reinforcing other elements of the Council's positive strategy for the historic environment:

"Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised. For example, this will include, but not be limited to:

- 1 producing and adopting conservation area appraisals and management plans;
- 2 maintaining a local list of non-designated heritage assets; and
- 3 maintaining a list of local heritage assets which are at risk, but which do not meet the criteria for inclusion on the national Heritage at Risk

The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will also be sustained and enhanced through new development, including promoting heritage-led regeneration where appropriate and delivering public benefits from the District's archaeological resources."

Our detailed comments on the plan's policy framework are included in Appendix A and on the proposed allocations in Appendix B. Also we provide some further comments on the Sustainability Appraisal in Appendix C.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
* Yes
* No

Yes

Please give reasons for your answer

4. Proposed Changes

Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised. For example, this will include, but not be limited to:

- 1 producing and adopting conservation area appraisals and management plans;
- 2 maintaining a local list of non-designated heritage assets; and
- 3 maintaining a list of local heritage assets which are at risk, but which do not meet the criteria for inclusion on the national Heritage at Risk

The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will also be sustained and enhanced through new development, including promoting heritage-led regeneration where appropriate and delivering public benefits from the District's archaeological resources.

- 1 No viable use of the asset can be found in the medium term through appropriate marketing that will enable its conservation; and

Development proposals for enabling development which would otherwise conflict with other policies in the Local Plan but which would secure the future conservation of a heritage asset will be permitted where:

- 1 the proposals will not materially harm the heritage value of the asset or its setting; ii. it can be demonstrated that alternative solutions have failed;
- the proposed development is the minimum necessary to protect the significance of the heritage asset;
- 1 it meets the tests and criteria set out in Historic England guidance GPA4: Enabling Development and Heritage Assets;
- 2 it is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and

	<p>3 it enables public appreciation of the saved heritage</p> <p><u>Supporting text</u></p> <p>5.57 The long-term conservation of a small minority of heritage assets can sometimes present particular problems. Enabling development is a planning mechanism which, in extreme cases, permits a departure from planning policies in order to enable the conservation of a relevant heritage asset in cases where the future of that asset would not otherwise be secured. Where planning applications propose enabling development, the Council will use the detailed and rigorous tests set out by Historic England in order to determine whether planning permission would be appropriate.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sulham Estate (Represented by Barton Willmore now Stantec)
Consultee Full Name	Mr Henry Scutt
Consultee Organisation	Sulham Estate
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1636
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	03/03/2023 12:13:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	Yes

Please give reasons for your answer	N/A
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p>Our comments to the Regulation 18 Consultation on the Local Plan Review 2020 – 2037: Emerging Draft (December 2020) raised that Policy SP9 did not accord with para 203 of the NPPF. Although we note that part of this Policy was revised, we remain of the view that this policy does not meet the test of soundness because it is not consistent with national policy.</p> <p>Policy SP9 lists the heritage assets to which it should be applied. We note that points f) and g) relate to Local Heritage Assets and, on this basis, Policy SP9 is interpreted as affording the same level of protection to designated and non designated heritage assets. In particular, we note that Policy SP9 states that 'development that has an impact upon a heritage asset, whether designated or non designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7'.</p> <p>This does not accord with paragraph 203 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a 'balanced judgement [...] having regard to the scale of any harm or loss and the significance of the heritage asset'. We note that there is no requirement within the NPPF for development that has an impact upon a non-designated heritage asset to maximise opportunities to preserve or enhance it.</p> <p>As such, the Draft Local Plan sets a higher standard than the NPPF on development that affects non-designated heritage assets, which could inhibit the delivery of sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
Please give reasons for your answer	

<p>4. Proposed Changes</p>	<p>Based on our comments above, we request that Policy SP9 is revised as detailed below (additions shown underlined deletions shown with a strikethrough). For ease of review we have only included the paragraphs that, in our view, should be subject to change so that Policy SP9 is in line with the NPPF.</p> <p>[...] These heritage assets include:</p> <p>a. Listed Buildings;</p> <p>b. Scheduled Monuments and archaeological sites of national importance;</p> <p>c. Registered Parks and Gardens;</p> <p>d. Registered Battlefields;</p> <p>e. Conservation Areas;</p> <p>f. Buildings, monuments, sites, places, areas and landscapes that have been added to the West Berkshire Local List of Heritage Assets; and</p> <p>g. Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of West Berkshire's heritage and are positively identified on the West Berkshire Historic Environment Record, or through the development management or other planning processes.</p> <p>Development that has an impact upon a <u>designated</u> heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7.</p> <p>[...]</p> <p>Weight will be given to the conservation of the District's <u>designated</u> heritage assets in a manner according to their importance. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</p> <p>[...]</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Historic England</p>
<p>Consultee Full Name</p>	<p>Historic England</p>
<p>Consultee Organisation</p>	<p>Historic England</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1768</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 9</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Historic Environment</p>
<p>Order</p>	<p>32</p>
<p>Submission Type</p>	<p>E-Mail</p>

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	With reference to paragraphs 5.55 and 10.92: We welcome reference to taking a "whole building approach"
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)
Consultee Full Name	Lochailort Newbury Limited
Consultee Organisation	Lochailort Newbury Limited
Agent Full Name	Sarah Ballantyne-Way
Agent Organisation	Lochailort Investments Ltd
Comment ID	PS1401
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We have the following comments and concerns in relation to Policy SP9. Generally, the policy should be divided into designated and non-designated heritage assets. They are dealt with collectively in parts of the policy, which is confusing, and would have the effect of artificially elevating the status of NDHAs beyond what is intended by statute or the NPPF. This is illustrated by 5.45 of the supporting text which gives great weight to all assets.</p> <p>The policy contains a section on substantial harm which states:</p> <p><i>Development which would lead to substantial harm to, or loss of, the significance of a designated heritage asset or its setting will not be permitted, unless...</i></p> <p>This statement is incorrect as it refers to harm to the setting of an asset. The setting of a LB or CA is not a designated heritage asset in itself and so harm to setting is not a test in the NPPF and one cannot substantially harm 'setting'. Harm arising from development in a setting needs to be understood as harm to the significance of that asset, where setting contributes to that significance.</p> <p>Similarly, the bullet points h-l comprise the re-wording of bullet points a-d of para 201 of the NPPF. For example, the following NPPF wording:</p> <p><i>conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible;</i></p> <p>has been changed to:</p> <p><i>Conservation by grant funding or some other form of charitable or public ownership is demonstrably not possible;</i></p> <p>The wording of para 201 of the NPPF should be used, there is no point in altering it and it means that the wording in the local plan is not entirely sound.</p> <p>Similarly, with regards to less than substantial harm, the local plan states: <i>Development which would lead to less than substantial harm to the significance of a designated heritage asset or its setting will not be permitted, unless this harm is outweighed by the public benefits of the proposal, including securing its optimum viable use.</i></p> <p>This should be reworded so that it copies the wording of paragraph 202 of the NPPF, otherwise this is unsound.</p> <p>Again, and for the same reasons, the following paragraph:</p> <p><i>Development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance (including that contribution to its significance by its setting), and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7.</i></p> <p>Should be amended to read:</p> <p><i>Development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to maximise opportunities to preserve, enhance, or better reveal the asset's significance and/or setting, and make a positive contribution to local character and distinctiveness through high standards of design in accordance with Policy SP7.</i></p>

	<p>ii. 'Proposals will be weighed against the public benefits of the proposal'. When one is dealing with DHAs it is not a simple balance, but one that accords great weight to the conservation of DHAs (see para 199 of the NPPF). This paragraph therefore does not reflect the provision of the NPPF and needs to be amended.</p> <p>iii. The proposed policy wording introduces additional tests for the assessment of development affecting DHAs and NDHAs (<i>whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset</i>) These are unnecessary – development proposals for DHAs should be considered in accordance with the suite of NPPF policies in paras 199-202 of the NPPF, and NDHAs in accordance with para 203.</p> <p>iv. The tests are themselves problematic. How does one comply with the limbs of the policy referring to 'use' when dealing with development proposals that affect a CA?</p> <p>v. The tests cloud and add complexity to the approach set out in the latter part of the policy (which as above should be amended to accurately reflect the NPPF).</p> <p>The section on enabling needs to be re-written in accordance with the guidance set out in HEAN4 (Enabling Development and Heritage Assets). For example (i) should refer to the balance of benefits (as enabling development may itself create some harmful effects that might on balance be outweighed by benefits elsewhere.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The following paragraph is superfluous, internally inconsistent and conflicts with the NPPF: <i>Weight will be given to the conservation of the District's heritage assets in a manner according to their importance. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</i></p> <p>This should be deleted for the following reasons:</p> <p>i. It refers to the justification of harm to designated and non-designated assets in the same sentence. This is liable to confuse as statute and the NPPF treat DHAs and NDHAs differently. While para 200 of the NPPF states that harm to a DHA should require clear and convincing justification, this is no more than demonstrating the requirements of paras 201 or 202. In contrast, para 203 requires that: <i>"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</i></p> <p>This distinction is blurred by the policy wording.</p> <p>ii. 'Proposals will be weighed against the public benefits of the proposal'. When one is dealing with DHAs it is not a simple balance, but one that accords great weight to the conservation of DHAs (see para 199 of the NPPF). This paragraph therefore does not reflect the provision of the NPPF and needs to be amended.</p> <p>iii. The proposed policy wording introduces additional tests for the assessment of development affecting DHAs and NDHAs (<i>whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset</i>) These are unnecessary – development proposals for DHAs should be considered in accordance with the suite of NPPF policies in paras 199-202 of the NPPF, and NDHAs in accordance with para 203.</p> <p>iv. The tests are themselves problematic. How does one comply with the limbs of the policy referring to 'use' when dealing with development proposals that affect a CA?</p> <p>v. The tests cloud and add complexity to the approach set out in the latter part of the policy (which as above should be amended to accurately reflect the NPPF).</p> <p>The section on enabling needs to be re-written in accordance with the guidance set out in HEAN4 (Enabling Development and Heritage Assets). For example (i) should refer to the balance of benefits (as enabling development may itself create some harmful effects that might on balance be outweighed by benefits elsewhere.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1415
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	Yes

account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	

Agent Organisation	
Comment ID	PS1766
Chapter / Policy / Appendix Number	Policy SP 9
Chapter / Policy / Appendix Title	Historic Environment
Order	32
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	In reference to para 5.45:

	It may be misleading to state the Council is solely responsible for identifying assets as non-designated heritage assets. As stated in the PPG, and indeed supported by para 5.48 in the proposed Local Plan, there are a number of processes through which non-designated heritage assets may be identified.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Heritage assets include designated heritage assets and assets identified <u>as</u> by the Council; 'non-designated' heritage assets.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 10 Green Infrastructure

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS239
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	We support the amendment to Policy SP7 which sets out that new development should reflect the National Design Guide (2021).
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Theale Parish Council
<p>Consultee Full Name</p>	Theale Parish Council
<p>Consultee Organisation</p>	Theale Parish Council
<p>Agent Full Name</p>	Samantha Haywood
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS604
<p>Chapter / Policy / Appendix Number</p>	Policy SP 10
<p>Chapter / Policy / Appendix Title</p>	Green Infrastructure
<p>Order</p>	34
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 18. SP10. The Blossom Lane peat bog area conflicts with the site selection.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sport England
Consultee Full Name	Mr Bob Sharples
Consultee Organisation	Sport England
Agent Full Name	
Agent Organisation	
Comment ID	PS423
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	01/03/2023 14:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I have gone through the Local Plan a few times and I am extremely disappointed about the lack references to formal sport facilities and playing fields.</p> <p>West Berkshire has an up to date robust playing pitch strategy and it identifies short falls in provision across the borough which the plan could have addressed.</p> <p>The Local Plan should be using this evidence base not to just to protect playing field sites, but to enhance them where required and provide more. For example, Henwick Worthy Sports Ground is a constrained site and needs to expand. Colleagues from leisure are investing in a masterplan, but there may not be enough land to meet all the sporting requirements on this site. The obvious solution is to allocate land the other side of Tull Way for relocating the sports hub and to allocate the current site for housing, to pay for it.</p> <p>An example of where the local plan fails to recognise the benefits of sport is 5.64 <i>Examples of GI assets</i>. In every other local plan I have dealt with which has a similar supporting policy statement or policy, playing fields are identified as an asset.</p> <p>Therefore I do not consider the Local Pan to be sound as currently written.</p> <p>However if there was a policy referring to the PPS and the need to enhance and provide playing fields, we would reconsider our position.</p> <p>Given the work Sport England and some your colleagues from a number of departments across WBC including development management, have been involved in over the past few years, this situation is very disappointing.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gujrati, Hemant
Consultee Full Name	Hemant Gujrati
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS672
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 12:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Local plan mentions about Green Infrastructure and the supporting document "SA_SEA Nov 2022 (for PS)", also mentions about greenspace. I could not find a designated map for the greenspaces. Please let me know if it is mentioned somewhere else in the document and I might have missed it</p> <p>I would also be keen to know more about the plans to meet the netzero target and steps taken to reduce the carbon footprint</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Reading Borough Council
<p>Consultee Full Name</p>	Mark Worringham
<p>Consultee Organisation</p>	Reading Borough Council
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS533
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:27:48
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	RBC generally supports this policy, but it lacks recognition of the need to link into identified green links or corridors within adjoining areas. In particular, much of the boundary with Reading is within the urban area, and the Reading Borough Local Plan has identified Green Links that connect to the boundary.

	Criterion g of the proposed policy particularly recognises the importance of wildlife connectivity in urban areas, and this could therefore benefit from a reference to connections beyond the boundary.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	The following change is suggested: <i>“Enhance the natural environment and natural processes to improve biodiversity and increase natural capital whilst seeking opportunities to use green infrastructure to extend wildlife corridors and provide habitat connectivity, particularly in urban areas, including where it crosses authority boundaries, and where it contributes to nature recovery networks;”</i>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS824
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP10 – GREEN INFRASTRUCTURE</p> <p>It is very disappointing that there is no proper Evidence work within this Plan as the promises made under OLD Policy CS 18 of a Green Infrastructure SPD never materialised. It is obvious from looking at the new development which has taken place that significant opportunities have been missed due to the lack of a GI Strategy, Categorisation, and mapping by typology.</p> <p>And there has been no attempt to Categorise or give typologies to Public Open Spaces which has led to confusion over the Categorisation of the Old Football Ground with a grass pitch at Faraday Road at the end of the LRIE and next to the Kennet SSSI. At one stage I identified it was within the Brownfield BR/2017/29 Boundary which was incorrect. The Old Newbury Town Football site should be allocated as a separate site within the Plan and given some policy that clearly states its Status and value as an Asset of Community Value. What its final use can be must be determined after a holistic Flood Risk Assessment & Surface Water Drainage Strategy for the wider site (NEW1 – LRIE or larger DEA) has been produced. It may be needed as a Wetland!!</p> <p>Likewise, without this Work and Categorisation of POS the Playing Pitch Strategy has become dominant and led to the possibility of the Manor Park NATURE-BASED Field with No Buildings and significant wildlife (Bats, Badgers & Slowworms) near the Coley Farm (RSA3) being turned into a Football Pitch. The Manor Park field also forms part of the SuDS for the houses down the hills in Turnpike – it is on a</p>

	<p>slope and is often water-logged and a small kiddies play-park has been agreed as part of the POS Off-site provision for the Coley Farm development.</p> <p>Without the presence of a Green/Blue Infrastructure or BAP or a Leisure & Culture Strategy the Playing Pitch Strategy is dominating, and it should be demanding more Playing Pitch space within Developments rather than trying to pinch what is already there for other purposes – such as walking and Nature preservation and recovery.</p> <p>This new Policy is not strong enough as it does not clearly articulate how much the buffer zones should be,</p> <p>There is no DM for the Canal Corridor.</p> <p>The Old Newbury Town Football Ground Public Open Space</p> <p>Again this is an old problem which is still seeing much discontentment over its future and as a separate Recreational Space next to the Kennet SSSI it needs a Sita Allocation and some DPD Policy behind it to protect and reform its future. Whilst it sits in limbo it is under utilised as a recreational space, its buffering function is not being enhanced for Nature Recovery or as part of the Wildlife Corridor.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Newbury Community Football Club (Represented by DPDS Consulting Group)
<p>Consultee Full Name</p>	Newbury Community Football Club
<p>Consultee Organisation</p>	Newbury Community Football Club
<p>Agent Full Name</p>	Les Durrant
<p>Agent Organisation</p>	DPDS Ltd
<p>Comment ID</p>	PS905
<p>Chapter / Policy / Appendix Number</p>	Policy SP 10
<p>Chapter / Policy / Appendix Title</p>	Green Infrastructure
<p>Order</p>	34
<p>Submission Type</p> <p>* E-Mail</p>	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The policies do not follow national advice
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Our client supports the commitment to protecting and enhancing existing Green Infrastructure assets across the District, especially where it states that proposals involving the loss of green spaces "will not be supported unless there is no longer a need for the existing infrastructure or an alternative is provided to meet the local needs that is both accessible and of equal or greater quality and benefit to the community". Our client also supports the inclusion of amenity green space, such as outdoor sports facilities, as green infrastructure assets.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes

Please give reasons for your answer	
4. Proposed Changes	However, it is noted that Natural England's (NE) Green Infrastructure Framework (which was emerging at the time, but has now been released) was referenced within the policy's supporting text. The Proposed Local Plan should provide further clarity on how the NE Framework has informed the policy.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We believe it is necessary as we are proposing significant modifications and the site which is the subject of our core representations is both important and controversial.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1152
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Policy SP10 seeks to maximise the potential for strengthening both local and strategic green infrastructure (GI) assets across the District. We are fully supportive of this Policy, and we consider that it is line with Section 15 of the NPPF, which seeks to Conserve and Enhance the Natural Environment.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	N/A
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1268
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP10 – Green Infrastructure is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1713

Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	To avoid introducing potential delays in the planning process, it is recommended that additional clarification is necessary to support the final paragraph of this policy, in accordance with the below:
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	i) Proposals involving the loss of green or blue spaces and other natural features will not be supported unless there is no longer a need for the existing infrastructure or an alternative is provided to meet the local needs that is both accessible and of equal or greater quality and benefit to the community <u>at the time of the determination of any planning application (with the exception of Reserved Matters where details of appropriate green infrastructure provision may be fixed as part of the outline planning permission).</u>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Valley Chamber of Commerce (Represented by DPDS Consulting Group Ltd)
Consultee Full Name	Mr Paul Britton
Consultee Organisation	Thames Valley Chamber of Commerce
Agent Full Name	Ms Mandy Wetherell
Agent Organisation	DPDS Consulting Group Ltd
Comment ID	PS1577
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:22:00
Attached Files	DPDS obo TVCC_attachment_full rep_redacted

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><See attached report for full representation - PS1577 DPDS obo TVCC_attachment_full rep></p> <p>Specific details within the attached rep relating to SP10 are below: Policy SP10 Green Infrastructure The Chamber supports the commitment to protecting and enhancing existing Green Infrastructure assets across the district, recognising the value that they can bring on a range of factors.</p> <p>The Chamber particularly supports the inclusion of amenity green space, such as outdoor sports facilities, as a type of green infrastructure asset, as maintaining and improving the health and happiness of the district's citizens is a mutually beneficial process which also helps local businesses.</p> <p>Again, using LRIE as an example, the Chamber is aware of the ongoing controversy surrounding the Faraday Road Football Ground (including its inclusion as a site for development in the Refresh Report), and would like to highlight it as a great example of important green infrastructure of considerable merit. The Chamber therefore fully supports the retention of the football ground for community sport use and as a key green infrastructure asset. This would also be a further example where a site specific policy would give certainty of the retention of this highly valued community facility.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes</p>	<p>Yes</p>

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We believe it is necessary as we are proposing modifications and the content of our representations is important.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1616
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Policy SP10: Green Infrastructure <i>See proposed changes below.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p>3. <i>The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or</p>

	<p>would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
4. Proposed Changes	<p>To avoid introducing potential delays in the planning process, it is recommended that additional clarification is necessary to support the final paragraph of this policy, in accordance with the below:</p> <p>i) Proposals involving the loss of green or blue spaces and other natural features will not be supported unless there is no longer a need for the existing infrastructure or an alternative is provided to meet the local needs that is both accessible and of equal or greater quality and benefit to the community <u>at the time of the determination of any planning application (with the exception of Reserved Matters where details of appropriate green infrastructure provision may be fixed as part of the outline planning permission)</u>.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1416
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure

Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mid and West Berkshire Local Access Forum
Consultee Full Name	Sandra Griffin
Consultee Organisation	Mid and West Berkshire Local Access Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS852
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	04/02/2023 13:54:00
Attached Files	PS852 MWBLAF - Photo.pdf PS852 MWBLAF - Policy 23 M
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	It is beyond the remit of the Forum to give an opinion on this question.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Paragraph 100 of the NPPF (July 2021) states: "Planning policies and decisions should protect and enhance public rights of way and access....".</p> <p>In the Regulation 18 consultation, the Forum proposed the addition of a specific policy on Public Rights of Way, based closely on the policy on Public Rights of Way in the West Berkshire Minerals and Waste Local Plan (version adopted by the Council on 1 December 2022, Policy 23; page 47 – reproduced below). In its response, the Council said:</p> <p>"The Council has considered the inclusion of a standalone policy on public rights of way but feels there is adequate legislation for rights of way outside of the Local Plan process." (see pages 638 and 640 of the Consultation Statement).</p> <p>The Forum believes that this conclusion is unsound, for two reasons:</p> <ol style="list-style-type: none"> 1 This is inconsistent with the Minerals and Wastes Local Plan; if there is "adequate legislation for rights of way", then there would be no need for a policy in the Minerals and Waste Local Plan. 2 The legislation relevant to public rights of way provides only limited protection of the ability to use that route (i.e. to 'pass and repass'), and in general no protection to maintaining the character of the right of way – the surrounding environment and the views from it. <p>The principal legislation relevant to public rights of way (PROW) is:</p> <ul style="list-style-type: none"> • Sections 41 and 130 of The Highways Act 1980: Section 41 places a duty on the highway authority to maintain the surface of a PROW, and Section 130 gives it a duty to prevent it from being obstructed. However, these duties only extend to the legal width of the PROW. • Part XIII of The Highways Act 1980: This contains provisions for the diversion, extinguishment or 'stopping up' of a public right of way. • The Town and Country Planning (General Permitted Development) (England) Order 2015: This gives permitted development rights for erection of a fence of up to 2m height, immediately adjacent to a PROW. <p>There are several locations in West Berkshire where a public right of way has been subsumed into the road network of a development, and has in effect become an urban footway. The photograph shows one example in Thatcham, where public footpath THAT/8/3 runs along the footway of Cowslip Crescent.</p> <p><i>[See attachment PS852 MWBLAF - Photo]</i></p> <p><i>[See attachment PS852 MWBLAF - Policy 23 M&W Local Plan]</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	

* Yes * No	
Please give reasons for your answer	It is beyond the remit of the Forum to give an opinion on this question.
4. Proposed Changes	<p>A specific policy on Public Rights of way should be added to the Local Plan: Public Rights of Way</p> <p>Development proposals will be permitted where the proposals do not adversely affect the Public Right of Way (PROW) network and, where possible, enhance it. When considering the adverse impacts consideration will be given to whether:</p> <ul style="list-style-type: none"> • The proposal maintains the character of the PROWs within the development or adjacent to it; • The proposal maintains the existing route during construction or, when this is impossible, propose an acceptable alternative route; • PROW should be reinstated as soon as is practicable; and • Opportunities are proposed that would secure appropriate, improved access, to the countryside. <p>The text that has been added to Policy SP10 (Green Infrastructure) complements this proposal for a new policy, and should be retained.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>The Forum wishes to have the opportunity to explain the importance of public rights of way, and how a specific policy is necessary to have a specific policy in order to protect their character. This is particularly important for any new sites that are proposed during the plan period, as these will not have a site policy in the Local Plan that addresses concerns that are specific to that site.</p> <p>We might also wish to comment on any West Berkshire Council response to the Forum's submission relating to the legislation applicable to Public Rights of Way.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1296
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP10 – Green Infrastructure is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1188
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	Yes

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	We welcome reference to the potential for green infrastructure to enhance access to the historic environment (e.g. through criterion j)
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	Yes

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1505
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	No
* Yes	
* No	
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework.</p> <p>The supporting text to the policy notes that green infrastructure is 'integral to successful place making'. However policy itself is vague and open to interpretation. The policy does not encourage development proposals to provide enhancements to green infrastructure that is over and above the baseline. For something which is, in the Council's own words; integral to successful place making, there is a distinct missed opportunity to encourage developments to deliver enhancements to green infrastructure.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Policy SP10 should be amended to include: 'Positive weight will be afforded to development that can demonstrate enhancements to Green Infrastructure'</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Englefield Estate (Represented by Savills)
<p>Consultee Full Name</p>	Englefield Estate
<p>Consultee Organisation</p>	Englefield Estate Office
<p>Agent Full Name</p>	Mr Jonathan Sebbage
<p>Agent Organisation</p>	Savills
<p>Comment ID</p>	PS1774
<p>Chapter / Policy / Appendix Number</p>	Policy SP 10
<p>Chapter / Policy / Appendix Title</p>	Green Infrastructure

Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Draft LPR Policy SP10 requires development proposals to protect and enhance green infrastructure across the District. It is noted that supporting paragraph 5.63 has been updated to include reference to the NPPF definition of green infrastructure and supporting paragraph 5.64 sets out 'examples of GI assets'.</p> <p>However, further clarification is required to specify land which is GI and subject to this policy. This is based on the Estate's experience where the relevant Core Strategy policy (Policy CS18) relating to GI has previously been misapplied to restrict development in rural areas. The NPPF glossary defines GI as land which can provide 'a wide range of environmental, economic, health and wellbeing benefits...for local and wider communities' and therefore it is clear that such land must be publicly accessible. As</p>

	such, it should be made clear that GI excludes for example open countryside, agricultural land and garden land, in line with the NPPF.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Policy SP10 and the supporting text as currently worded does not meet the tests of soundness set out in NPPF paragraph 35. The following changes are thereby recommended in order to ensure the soundness of the Plan: <ul style="list-style-type: none"> Supporting paragraphs 5.63-5.64 should be updated to state that 'GI assets exclude open countryside, agricultural land and garden land.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1570
Chapter / Policy / Appendix Number	Policy SP 10
Chapter / Policy / Appendix Title	Green Infrastructure
Order	34
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>We have reviewed Policy SP10 - Green Infrastructure and suggest that the title is changed to - Blue Green infrastructure.</p> <p>We understand that the NPPF defines Green Infrastructure as “A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.” However, the use of the terminology ‘blue’ is to capture the fact that blue infrastructure elements – such as water bodies (rivers, ponds, streams etc) are also being considered as is the case with this policy.</p> <p>In bullet point ‘o’, the provision of 'buffer strips' is mentioned. This should be changed to buffer zones to match with the rest of the wording in the plan. It will be useful to also state that these buffer zones need to be at least 10m wide and should be planted with primarily local native species of UK genetic provenance and used to provide habitat and corridors for species which use the riverbanks and the water.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	<p>In bullet point 'o', the provision of 'buffer strips' is mentioned. This should be changed to buffer zones to match with the rest of the wording in the plan. It will be useful to also state that these buffer zones need to be at least 10m wide and should be planted with primarily local native species of UK genetic provenance and used to provide habitat and corridors for species which use the riverbanks and the water.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy SP 11 Biodiversity and geodiversity

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS194
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	We support the requirement to deliver Biodiversity Net Gain however we note that the required minimum gain will be imposed under the Environment Act 2021. This requirement is not yet in force, and it is expected to be required from November 2023.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
<p>4. Proposed Changes</p>	<p>We therefore suggest that this policy is amended to state “development proposals will be required to demonstrate how they conserve and enhance biodiversity and/or geodiversity including their long-term future management and deliver Biodiversity Net Gain in accordance with the Environment Act 2021”. This would ensure that planning policy takes account of new and evolving requirements under the Act.</p> <p>The sub-text of the policy in para 5.87 indicates that householder and minor applications would need to be supported by a Preliminary Ecological Appraisal. This would incur additional costs to planning applications for even small-scale developments which could result in such developments becoming unviable. We therefore suggest that para 5.87 is amended to require a Preliminary Ecological Appraisal to be dealt with via planning condition if the site is considered to be ecologically sensitive to avoid potentially abortive costs for small-scale applications in the event the proposals are considered unfavourably.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	N/A
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hermitage Parish Council
<p>Consultee Full Name</p>	Nicky Pierce
<p>Consultee Organisation</p>	Hermitage Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS388
<p>Chapter / Policy / Appendix Number</p>	Policy SP 11

Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 10:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	HPC does not feel competent to provide such detailed comments on proposals for other parishes; but we would like to express our support for the following overarching policies: <ul style="list-style-type: none"> • SP11 Biodiversity and geodiversity, though we would suggest that point (a) should read "status of the site and species" since both factors will come into play.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Berkshire Ornithological Club and Newbury District Ornithological Club
Consultee Full Name	Mr Neil Bucknell
Consultee Organisation	The Berkshire Ornithological Club and Newbury District Ornithological Club
Agent Full Name	
Agent Organisation	
Comment ID	PS546
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 15:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<i>It does not comply with NPPF policies 174 (by not fully protecting biodiversity), 179 (by not having a policy to specifically promote the identification of LWS sites or cover sites of biodiversity importance that have yet to be designated as such, or provide protection pending the formulation of a Local Nature Recovery Strategy) and 180 (by not making it clear that applications that do not comply with biodiversity policies and result in net loss of (or overall adverse impact on) any protected habitat or species, where such loss is not either prevented on-site or in exceptional circumstances by other mitigation for such habitat or species will be refused).</i>

	<p><i>In applying a sequential test to applications possibly affecting designated sites, there is no requirement that the biodiversity feature for which the site has been designated should be the primary consideration in assessing whether any mitigation to be considered in "last resort" cases is acceptable – if the mitigation does not fully address the biodiversity feature or features for which the site is designated it should be refused.</i></p> <p><i>There are two particular problems locally. Our experience is that there has not been an adequate (and consistently maintained) review of LWSs, so sites which are discovered to have wildlife value remain unprotected pending their promotion, assessment and designation. The formulation of a Local Nature Recovery Strategy is still in its very early stages, and pending its completion and adoption there will be an important gap in the basis upon which the policies will be based. Unless there are policies that cover these gaps the plan cannot achieve compliance with the NPPF.</i></p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>Because it does not satisfy the requirements of the NPPF as set out in section 1 above.</i></p> <p><i>In relation to effectiveness, there is currently no Local Nature Recovery Plan, which will be formulated in conjunction with the other Berkshire unitary authorities.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>To cover our objections we suggest-</p> <p>1 - An overriding policy on a precautionary basis to cover the position pending adoption of the LNRS and in respect of species and sites for which conservation management plans have yet to be formulated or LWS designation has not been concluded by-</p> <p>1.1. - amending para (h) of policy CP11 as follows (addition shown underlined) –</p>

	<p><i>Is compatible with any Biodiversity Action Plan, Local Nature Recovery Strategy and /or other strategic conservation management plans or <u>site designations</u> for species or habitats that have been formally adopted by the Council,</i></p> <p>1.2 - adding a further para (i) to policy CP11 as follows-</p> <p><i>(i) where such plans, strategies or designations referred to in para (h) have yet to be formulated, completed or adopted, it does not adversely affect any fauna or flora on the site or habitat or that is potentially affected by the proposed development which has been identified as having an adverse conservation status (a) by JNCC designation as having red- or amber-list status, or (b) under any emerging local conservation management plan as a species or habitat requiring conservation measures.</i></p> <p>2 - To deal with our concerns about ensuring that any mitigation offered and implemented in exceptional cases protects the species for which the affected site is important, add a further paragraph to the end of the policy as follows-</p> <p><u>Mitigation or Compensation in exceptional cases</u></p> <p><i>Any mitigation or compensation measures proposed as referred to in paras (l), (q) and (t) above must fully mitigate the effect of the proposed development on the habitats and species which are either those for which the impacted site has been designated, or for which the site has have been identified as being significant, and should they not satisfy the council (applying a precautionary approach) that they will do so, permission will be refused.</i></p> <p>3 - To deal with our concerns about the problems of keeping the list of LWSs up-to-date, by adding a sentence to the end of para 5.83 as follows – <i>The council recognises that the process of designating such sites is a continuing process, and that sites discovered by new investigations and surveys as having value, and the changing conservation status of species over time as disclosed by national and local monitoring schemes will result in further sites qualifying for consideration for designation. It will seek to review its list of sites, and take evidence of potential qualification for designation into account when considering the impact of proposed development on biodiversity.</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jarman, Alastair
Consultee Full Name	Mr Alastair Jarman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS360
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 17:55:57
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>SP 11 appears to be in direct conflict with the NPPF 180 c, especially regarding what defines "exceptional" circumstances. Government guidance infers this to be Nationally important infrastructure (HS2 for example). I do not believe a local housing estate is a nationally important project, and if it were, then ANY ancient woodland would fail to be protected by the NPPF.</p> <p>"c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 63 and a suitable compensation strategy exists;</p> <p>SP11 states.</p>

	<p>Proposals which are likely to result in the loss or deterioration of an irreplaceable habitat (such as ancient woodland, ancient or veteran trees, ancient hedgerows, traditional unimproved meadows/ancient grasslands and lowland fens) will only be permitted for wholly exceptional reasons where:</p> <ol style="list-style-type: none"> 1 The need and benefits of the development in that location clearly and unambiguously outweigh the loss; 2 It has been adequately demonstrated that the irreplaceable habitat cannot be retained with the proposed scheme; and 3 Appropriate compensation measures are provided on site wherever possible and off site where this is not feasible. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat and will be considered on a site by site basis, including long term management and maintenance.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS706
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Sandleford Park West (SPW) Like Policy SP5, my client supports the principles outlined in Policy SP11 – Biodiversity and Geodiversity , however reference within the policy to the requirement for '10% Biodiversity Net Gain' is currently unlawful – the Environment Act 2021 sets out that this requirement will be mandatory from a yet to be confirmed date, in November 2023. As such, at the time of drafting, the Council does not have the legal basis upon which to require applicants to provide this requirement. Accordingly, Policy SP11 should be amended to reflect the relevant, national requirement for Biodiversity Net Gain in force at the time an application is considered.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Say No to Sandford (David Cooper)
Consultee Full Name	David Cooper
Consultee Organisation	Say No to Sandford
Agent Full Name	
Agent Organisation	
Comment ID	PS466
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 20:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write on behalf of the campaign organization SayNoToSandleford (SNTS) in relation to the above document. We have the following comments on the following specific policies.</p> <p><u>Policy SP11: Biodiversity and geodiversity</u></p> <p>SP 11 appears to be in direct conflict with the NPPF 180 c, especially regarding what defines "exceptional" circumstances. Government guidance infers this to be Nationally important infrastructure (HS2 for example). I do not believe a local housing estate is a nationally important project, and if it were, then ANY ancient woodland would fail to be protected by the NPPF.</p> <p>"c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons [63] and a suitable compensation strategy exists;</p> <p>SP11 states.</p> <p>Proposals which are likely to result in the loss or deterioration of an irreplaceable habitat (such as ancient woodland, ancient or veteran trees, ancient hedgerows, traditional unimproved meadows/ancient grasslands and lowland fens) will only be permitted for wholly exceptional reasons where:</p> <p>15. The need and benefits of the development in that location clearly and unambiguously outweigh the loss;</p> <p>16. It has been adequately demonstrated that the irreplaceable habitat cannot be retained with the proposed scheme; and</p> <p>17. Appropriate compensation measures are provided on site wherever possible and off site where this not is feasible. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat and will be considered on a site by site basis, including long term management and maintenance.</p> <p>The threshold of "wholly exceptional" does not apply to a local housing development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Marriage (Represented by ET Planning)
Consultee Full Name	Messrs Marriage
Consultee Organisation	
Agent Full Name	Robyn Milliner
Agent Organisation	ET Planning
Comment ID	PS405
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	28/02/2023 11:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The principles within Policy SP11 are supported, particularly the requirement for development proposals to demonstrate how they conserve and enhance biodiversity and/or geodiversity including their long-term future management and deliver a minimum 10% biodiversity net gain.</p> <p>It is considered that the Plan could go further in supporting biodiversity by allocating specific sites for biodiversity net gain.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p><i>To represent my clients' best interests and explain the merits of the site and why it should be included within the site boundary</i></p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes</p>	<p>Yes</p>

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	BioCap (Ed Cooper)
Consultee Full Name	Ed Cooper
Consultee Organisation	BioCap
Agent Full Name	
Agent Organisation	
Comment ID	PS724
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 14:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Policy SP11 states the following;</p> <p>"Biodiversity Net Gain</p> <p>All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using the most up to date biodiversity accounting metric developed by Natural England and provide details of the long-term maintenance and management of the net gain. <i>This should be delivered on site in the first instance, or through biodiversity off setting where appropriate.</i>"</p> <p>The above highlighted statement and in particular the emphasis on, on-site delivery in the first instance, is contrary to other guidance in the NPPF (see below) which has a greater ambition for the local plan area and biodiversity. On-site delivery will often be compromised by the nature of the development and/or the short/medium/long term pressure and harmful impacts over 30 years of people/children recreation and pets. In many instances off-site provision will be better managed over the 30 year period and will provide longer lasting higher quality biodiversity gains.</p> <p>NPPF 174</p> <p>Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>d) minimising impacts on and providing net gains for biodiversity</p> <p>175 Plans should:</p> <p>plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p> <p>1 To protect and enhance biodiversity and geodiversity, plans should: b) identify and pursue opportunities for securing measurable net gains for biodiversity.</p> <p>To comply with the above NPPF guidance the wording in SP11 needs to allow the use of off-site BNG, not as a last resort, but where BNG will positively contribute to habitat creation, and significant biodiversity enhancements in the wider local countryside over the 30 year period.</p> <p>Wording such as below would comply more closely with NPPF guidance: <i>This should be delivered on site where possible or through local biodiversity offsetting where a better result for biodiversity would be achieved over the contracted 30 year period and beyond.</i></p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	To comply with the above NPPF guidance the wording in SP11 needs to allow the use of off-site BNG, not as a last resort, but where BNG will positively contribute to habitat creation, and significant biodiversity enhancements in the wider local countryside over a minimum of a 30 year period. Wording such as below would comply more closely with NPPF guidance: <i>This should be delivered on site where possible or through local biodiversity offsetting where a better result for biodiversity would be achieved over the contracted 30 year period and beyond.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	To comply with the above NPPF guidance the wording in SP11 needs to allow the use of off-site BNG, not as a last resort, but where BNG will positively contribute to habitat creation, and significant biodiversity enhancements in the wider local countryside, in accordance with emerging Local Nature Recovery Strategies. Wording such as below would comply more closely with NPPF guidance: <i>This should be delivered on site where possible or through local biodiversity offsetting where a better result for biodiversity would be achieved over the contracted 30 year period and beyond.</i>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The WBC method of managing biodiversity seems to mainly involve policing on-site habitat activity which the Biodiversity Metric may score well in the first instance but would in fact be severely negatively impacted by 30 years of domestic/residential/business activities and pressures on and around the site. We believe there is an opportunity to make real benefits and gains in the wider countryside to reverse biodiversity loss but this needs the proactive help of planners encouraging local off-site high quality habitat creation and linkage schemes, as is happening in other local authority areas.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North Wessex Downs AONB
Consultee Full Name	Rebecca Davies
Consultee Organisation	North Wessex Downs AONB
Agent Full Name	
Agent Organisation	
Comment ID	PS684
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:49:44
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	The AONB would encourage a higher minimum net gain for areas in the AONB given the unique habitats in this chalk landscape and there sensitivity to change. The AONB would encourage a 20% net gain.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS828
Chapter / Policy / Appendix Number	Policy SP 11

Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP11 – BIODIVERSITY & GEODIVERSITY</p> <p>There is little work within the Evidence Base to allow us to think this has been a priority for WBC. Ecological Reports are not listed within Planning Documents, and the Public are not allowed to view them which means the work of the various Mammal Societies is inhibited. Relocation of species on sites underway is not monitored, and snakes and slowworms are just thrown over fences.</p>

	<p>The recently arrived Ecologist is buried under the Planning Department rather than taking on a strategic role within the Organisation.</p> <p>Despite the Climate Emergency being declared in Spring 2019 there has been little concentration on Nature Recovery or trying to ensure local Wildlife Corridors can still exist and operate.</p> <p>The examples of Coley Farm and Sims Metal yard and their proximity to Ancient Woodlands is a classic example where it would have been possible to consider these aspects but the opportunity is lost as will the wildlife be lost.</p> <p>Planning Committee Councillors never bring up these aspects in their debates just concentrating on making sure Humans are provided for. There are much better examples of Biodiversity & Geology Policies out in other plans.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1259
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
<p>Submission Type * E-Mail * Letter * Other * SMS</p>	E-Mail

* Web * Unknown	
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The use of the word "will" where it is intended to refer to the placing of a constraint on development should be replaced by "must". For example, in the first line of SP11, instead of "development proposals will be required to demonstrate", it should say "must". Otherwise the sentence could be argued to merely mean that the policy predicts that such proposals will "conserve and enhance ..." so that developers could argue that in a particular circumstance their proposals need not comply with the policy.</p> <p>This is supported by central government guidance from The Office of Parliamentary Counsel: Drafting Guidance'; June 2020 (Footnote: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892409/OPC_drafting_guidance_June_2020-1.pdf (retrieved 12/02/2023)) Conserving biodiversity and where possible enhancing it is an existential matter for the Planet and there can be no easy exemptions. There may be many and/or complex ways to achieve it but no development can be allowed that has not been subject to a rigorous examination of how this will be achieved. The policy and its supporting text needs to be reviewed in this light.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	Yes

* No	
Please give reasons for your answer	N/A
4. Proposed Changes	"Will" should be replaced with "must" in the following places: Line 1; line 2 of 'a'; line 1 under "Internationally Designated Sites"; line 2 of 'q'.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We would expect the normal legal meaning of the words "will", "must" and "shall" are accepted during Examination of the Plan. In the context of imposing an obligation on a developer, "must" is essential, whereas "will" is merely a prediction. There are other uses of "will" in other policies in the draft Plan which we would hope are scrutinised by the Inspector. This is just the most important Policy of all as it affects all forms of life.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Woodland Trust
Consultee Full Name	Ms Bridget Fox
Consultee Organisation	The Woodland Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS851
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 00:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	The draft policy complies with the NPPF requirement to protect irreplaceable habitats, including ancient woodland, except in exceptional circumstances and with compensation commensurate to the loss or deterioration of the irreplaceable habitat to be considered on a site by site basis, including long term management and maintenance.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As noted above, the draft policy is consistent with NPPF policy on protection of irreplaceable habitats. This is made more effective by the wording in the supporting text in para 5.80 which clarifies that compensation measures for irreplaceable habitats will not be considered acceptable where the replacement habitat provided results in a neutral impact, that compensation will be based on the nature or extent of damage or loss, and will be assessed on a site by site basis in consultation with the relevant conservation body. The Woodland Trust supports this approach
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	n/a
4. Proposed Changes	n/a
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	n/a

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Allison, Roger
Consultee Full Name	Roger Allison
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS469
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stratfield Mortimer Parish Council
Consultee Full Name	Lynn Hannawin
Consultee Organisation	Stratfield Mortimer Parish Council
Agent Full Name	Lynn

	Hannawin
Agent Organisation	
Comment ID	PS586
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:43:48
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	All proposals demonstrating biodiversity gain of 10% minimum “ if intended to mean ALL planning proposal would seem to be impractical as this would include every house extension requiring planning permission. That this is the intention is reinforced in 5.87 by “The assessment should be proportional to the scale of the development and so for householder and most minor applications this will initially involve a Preliminary Protected Species Survey or Preliminary Ecological Appraisal”. It is unlikely there are sufficient ecologists available to produce such surveys for every planning application.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	BBOWT
Consultee Full Name	Daniel Tritton
Consultee Organisation	BBOWT
Agent Full Name	
Agent Organisation	
Comment ID	PS1246
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	BBOWT welcomes the policy on biodiversity and geodiversity aimed at conserving and enhancing biodiversity and delivering a net gain and the addition of wording to protect main rivers. We would suggest this include all rivers and stream corridors. Biodiversity Net Gain The government consulted on the introduction of mandatory biodiversity net gain into the planning system in late 2018 and confirmation of this was announced in spring 2019. The Environment Bill passed in 2021 and the New Environment Act (2021) was adopted. The adopted Environment Act sets out the statutory obligations of this decision in detail. The legislation sets the minimum gain required in biodiversity units at 10% over base value. However, several leaders in this policy area have already adopted a 20% minimum gain, with robust justification for doing so (See; Lichfield District Council Biodiversity & Development: Supplementary Planning Document 2016, (p.17) & Oxfordshire's Biodiversity Advisory Group proposals for the Oxfordshire Plan 2050).

Relevant findings from Defra’s Impact Assessment document (See; Biodiversity Net Gain Consultation Impact Assessment, Defra 2018 (21/11/2018) include:

- “..In simple terms, [10%] is the lowest level of net gain that [Defra] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”
- “..Advice from some Natural Capital Committee members suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses.”
- “..The department therefore favours as high a level of net gain as is feasible... The analysis undertaken in this Impact Assessment indicates that the level of requirement makes relatively little difference to the costs of mitigating and compensating for impacts.”

BBOWT’s position is therefore to support and actively encourage the universal adoption of a required minimum 20% biodiversity net gain within policy in West Berkshire.

Irreplaceable Habitats

Paragraph 180 (c) NPPF states that “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists” BBOWT believe that irreplaceable habitats should not be developed on and that no amount of a mitigation measures or compensation can never really be adequate when irreplaceable habitat is lost.

q. Appropriate compensation measures are provided on site wherever possible and off site where this not is feasible. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat and will be considered on a site by site basis, including long term management and maintenance.

BBOWT are concerned about the way this is worded using the term commensurate. There is a danger that commensurate could be interpreted as meaning the same area e.g. some definitions of commensurate use terms such as “corresponding or equal in size or extent or amount”. Whilst this may not be what is intended there is a risk that this is taken to mean that if 1ha of ancient woodland is lost, then 1 ha should be replaced. This would be a vast under expectation compared to what is widely accepted as being needed in terms of compensation measures for irreplaceable habitats. These habitats are, by definition, irreplaceable and where lost then very large amounts of replacement habitat are needed to even begin to compensate for the loss. For example, in the Natural England report to HS2 on the net gain metric, Natural England stated the opinion: “23. For a project of this scale, it is the judgement of Natural England that HS2 Ltd should aim to create 30 hectares of new woodland for every hectare lost, where ancient woodland is to be replaced by new woods.” Therefore we consider that alternative wording should be used or else a definition should be attached to commensurate to make clear it is not meaning the same in area but instead compensation of a considerable scale that reflects the huge impact resulting from the loss of irreplaceable habitats.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Royal Borough of Windsor & Maidenhead
Consultee Full Name	Royal Borough Windsor & Maidenhead
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1541
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We are also pleased to see the West Berkshire Local Plan Review includes a policy on 10% Biodiversity Net Gain (policy SP11). In conclusion, the Royal Borough of Windsor and Maidenhead has no concerns or objections to the Regulation 19 version of the Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1714
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	To future-proof the policy, it is recommended that additional wording is included to provide for greater flexibility in the use of an appropriate metric to measure Biodiversity Net Gains which is not specifically the current metric developed by Natural England:
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	ii) All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using the most up to date an appropriate biodiversity accounting metric, either developed by Natural England or an agreed alternative, and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off setting where appropriate.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Thakenham Homes
<p>Consultee Full Name</p>	Craig Pettit
<p>Consultee Organisation</p>	Thakenham Homes
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1607
<p>Chapter / Policy / Appendix Number</p>	Policy SP 11
<p>Chapter / Policy / Appendix Title</p>	Biodiversity and geodiversity
<p>Order</p>	36
<p>Submission Type</p>	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Policy SP11 (Biodiversity and Geodiversity) – Thakeham is supportive of the Council's requirement for all proposals to demonstrate a minimum of 10% biodiversity net gain, within the development at the first instance, or via off setting where not viable. This is in line with Thakeham's own internal commitment to achieving a 10% biodiversity net gain across all of our developments, which will increase to 20% from 2025.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1417
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Support policies
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1556
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>We have reviewed Policy SP11, Biodiversity and geodiversity and have concerns regarding this policy most of which we mentioned previously. Currently the policy does not satisfactorily adhere to the requirements of national policy – NPPF section 15.</p> <p>There is no inclusion on the size of the buffer zone and as stated in other places, this needs to be 10 metres. Bullet point 'd' states that development will be permitted where it: <i>“Provides or retains appropriate buffer zones between development proposals and designated sites, habitats for protected or priority species or main rivers, which are informed by detailed site-based assessment.”</i></p> <p>The use of 'appropriate' as stated is ambiguous and could end up with a buffer which is not sufficient. As we stated previously, some watercourses require even be more than a 10m buffer provided at either size of the watercourse due to the importance of the designated rivers in West Berkshire, the River Kennet SSSI and River Lambourn SAC. As well, habitats of principle importance also need a buffer zone, not just designated sites.</p> <p>We reiterate that a standalone policy specifically about the water environment to provide more protection for the water environment is required. This is particularly important given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain. We have made a separate representation regarding this.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>We suggest that the policy text point 'd' is amended to include the requirement for 10 buffer zone and we suggest the following;</p> <p><i>‘Provides or retains appropriate at least 10m buffer zones between development proposals and designated sites, habitats for protected or priority species or main rivers, which are informed by detailed site-based assessment. Due to the importance of the designated rivers in West Berkshire (i.e. the River Kennet SSSI and River Lambourn SAC), some watercourses require even be more than a 10m buffer provided at either size of the watercourse.’</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>We wish to attend the examination for an opportunity to explain the need for Policy SP11 - Biodiversity and geodiversity to be further strengthened to provide more protection for the water environment.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1297
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	Yes

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP11 – Biodiversity and Geodiversity is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1270
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<i>Policy SP11 – Biodiversity and Geodiversity is supported.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1617
Chapter / Policy / Appendix Number	Policy SP 11
Chapter / Policy / Appendix Title	Biodiversity and geodiversity
Order	36
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Policy SP11: Biodiversity and Geodiversity</p> <p><i>See proposed changes below.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met</p>

	<p>wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
4. Proposed Changes	<p>To future-proof the policy, it is recommended that additional wording is included to provide for greater flexibility in the use of an appropriate metric to measure Biodiversity Net Gains which is not specifically the current metric developed by Natural England:</p> <p>i) All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using the most up-to-date an appropriate biodiversity accounting metric, either developed by Natural England or an agreed alternative, and provide details of the long-term maintenance and management of the net gain. This should be delivered on site in the first instance, or through biodiversity off setting where appropriate.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 12 Approach to Housing Delivery

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Musgrave and Begley, M&W (Represented by Fisher German LLP)
Consultee Full Name	Mr M and W Musgrave and Begley
Consultee Organisation	
Agent Full Name	Angela Brooks
Agent Organisation	Fisher German LLP
Comment ID	PS148
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 14:36:00
Attached Files	Fisher German obo MusgraveandBegley
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>This consultation response has been prepared by Fisher German on behalf of our clients Mr M Musgrave and Mr W Begley in respect of their land adjacent to Oxford Road, Chieveley, as illustrated in the attached.</p> <p>The land, which extend to circa 6.58ha, is located to the east of Chieveley. The site is defined by residential development and Graces Lane to the south, Oxford Road to the east, residential development and East Lane to the north and a field to the west. The site benefits from mature boundary planting and forms a logical infill location close to the centre of Chieveley.</p> <p>These representations follow the order of the policies within the Submission Plan, wherein we have not commented we have no specific comments at this stage. If you have any questions regarding these representations, please contact the author.</p> <p><i>Extract of response relevant to consultation point:</i></p> <p>The Council set out that their Local Housing Need (LHN), as derived from the Standard Method, at the time of publication is 513 dwellings per annum. This forms the Council's proposed baseline housing requirement.</p> <p>The PPG is clear that when establishing a housing requirement "the standard method for assessing local housing need provides a <i>minimum starting point</i> in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates." [our emphasis] (Paragraph: 010 Reference ID: 2a-010-20201216). Examples of scenarios which may justify an increase of housing requirement include growth strategies, the delivery strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority.</p> <p>It is important to note that the PPG sets out that the consideration of whether uplifts to the housing requirement from local housing need are necessary should be undertaken prior to and independently from any consideration of the ability of an area to meet that need.</p> <p>It is therefore noticeable that independent studies commissioned by West Berkshire suggests strongly that the housing requirement should be higher to ensure economic growth ambitions can be realised, equating to 600 dwellings per annum at a minimum – some 87 dpa higher than the LHN.</p> <p>The Icen West Berkshire Updated Housing Needs Assessment insinuates at paragraph 4.46 that households will form at a rate of 1,002 dwellings per annum, with two-fifths of these being unable to afford private market housing. Whilst some of these forming households will be able to purchase or rent existing housing stock, it has not been demonstrated that the delivery of only 513 dwellings per annum will be sufficient to ensure that there is an adequate housing supply to meet household formation rates. This may result in overcrowding or people being forced out of the area due to unavailable housing. Post-recession this will result in disproportionate house price growth.</p> <p>In respect of affordable housing, it is apparent from the Council's evidence (West Berkshire Updated Housing Needs Assessment) that there is a significant affordable need in the District (between 223-330 dwellings per annum) and within the AONB specifically. Whilst the evidence document concludes that it is not practicable to directly link affordable housing need and overall housing need, it is clear given the high numbers involved that it would be proportionate to uplift housing need beyond LHN to at least ensure that the issue can be reduced as far as reasonably practicable.</p> <p>This issue is particularly significant in the AONB, with an annual residual need for affordable housing equating to as much as 150 dwellings per annum, but also where major housing sites are to be largely restricted, despite these forming the bulk provider of affordable housing. This demonstrates the acute need for some form of policy allowance for a pragmatic approach to housing delivery in the AONB.</p> <p>It is imperative that the Council can demonstrate clearly that the Plan will contain sufficient sites, including sufficient lead in times, to deliver a robust five-year housing land supply at the time of adoption and also the overall quantum of housing required over the entire Plan period.</p> <p>The Council proposes a 5% buffer, reduced from the 10% previously suggested. The Council justify this approach at paragraph 2.33 of the Housing Background Paper (January 2023) by stating this strikes the appropriate balance between "<i>boosting housing supply in the district while considering the limitations and constraints of a largely rural district</i>". The Paper then considers the Written Ministerial Statement of the 5th December 2022 which sets out that LHN is an advisory starting point, not mandatory and that local authorities will have some autonomy to deviate from LHN. It is noticeable however that this does not materially alter the established Standard Method which always enabled deviation if circumstances justified. It is also noted that current actions and rhetoric undertaken by the Government are likely politically motivated. It is clear from the Council's own evidence that the requirement, including the proposed buffer as discussed below, is likely to be insufficient, to the detriment of local people, particularly those in affordable housing need, maintaining balanced communities, particularly in the AONB and will not deliver economic growth. In the current economic climate, such outcomes will be particularly undesirable. Furthermore, Paragraph 60 of the NPPF confirms that the national objective is to boost <u>significantly</u> the supply of housing.</p> <p>It is noted that the proposed 5% buffer results in headroom of just 421 dwellings over the Plan period, or 24 dwellings per annum. This would leave the Plan highly vulnerable and is not at all robust. We</p>

	<p>consider that a buffer of at least 10% is more appropriate and would more suitably safeguard the Plan from issues of non-delivery or slower than anticipated delivery of strategic sites. This approach would also serve to contribute to additional affordable housing and economic growth if delivered.</p> <p>It is noted that a significant amount of supply relied upon by this Local Plan is derived from extant allocations. Clearly given the amount of time a number of these sites have been allocated for, approximately six years, it is not clear if they are deliverable. Particularly the non-strategic sites which would have reasonably expected to commence by now. Significant evidence would be required to demonstrate that all sites relied upon are actually deliverable having regard for the non-delivery to date.</p> <p>Further concern is raised in that the Council's assumptions for windfall development, and that past trends of windfall delivery can accurately predict future supply, where logically every windfall development delivered removes a potentially suitable site from future supply. It does not stand to reason that within the settlement boundaries which are not extended, the number of windfalls will remain consistent, unless there is clear and compelling evidence that there remains enough suitable land available for such delivery.</p> <p>Whilst we would always support appropriate development within the settlement boundary, due regard must be had for the contribution that green spaces and open gaps make within settlement boundaries. Encouraging their development can urbanise settlement centres, having a damaging impact on their form and character. As set out previously, this approach places weight on the approval of windfall schemes, which ultimately may be harmful to settlement character, such as garden grabbing or the intensification of housing delivery within existing curtilage plots. We do not consider the Council's approach to windfall development is sound, and we do not consider the methodology used is justified in light of the above, nor is likely to be effective. The expected rate of windfall delivery should be reduced on the above basis. Moreover, as set out previously, a strong reliance on windfall delivery logically will reduce the level of affordable housing delivered which is not appropriate given the evidenced acute need.</p> <p>We therefore consider for the various reasons set out above that the Policy is not sound, as it is not effective, justified or consistent with national policy.</p> <p><i>For full response please see attachent.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Withers, Brian
<p>Consultee Full Name</p>	Brian Withers
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS124
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	21/02/2023 17:27:11
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	It forms the basis for the requirement for such a document
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Some of the policies are very old and do not fit today's requirements as laid down in the NPPF

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Policy SP12</p> <p>New homes will be located in accordance with Policy SP1: Spatial Strategy, Policy SP3: Settlement hierarchy and Policy DM1: Development in the Countryside amongst the West Berkshire strategic Objectives should provide a range of sites to ensure that the District's housing needs and aspirations are met by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations.</p> <p>Policy SP12, identifies that several sources will ensure a continuous supply of land for housing across the plan period. That said, there is a note within SP12 that there may be a requirement that West Berks could have to support a shortfall of 230 homes in the period to 2036 that have been identified in the Reading Local Plan</p> <p>Windfall sites are covered as sites not specifically identified in the Local Development plan but those that will come forward through the development management process in accordance with policies set out in the Local Plan and through the use of permitted development rights. There will also be identified within that section new sites allocated in the LPR and also new sites to be allocated in identified neighbourhood plans once these are established. The council have declared that they are looking for over 1,958 units on windfall sites.</p> <p>The local Plan proposal says, [quote]: "<i>The NPPF states that local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes (Para.68). Policies within the LPR identify the most sustainable settlements and direct development to the built up areas within settlement boundaries. The Council also publishes and maintains a register of brownfield sites that are available and potentially suitable for residential development across the District.</i>"</p> <p>This is a slight stretch given what the NPPF actually says in Para 68. The NPPF policy indicates that councils should produce a strategic housing land availability assessment. There is no mention, as identified in the local plan proposal, for land availability only within settlements. It clearly states the number of deliverable sites within the plan period on developable sites or broad locations for growth. The NPPF does however identify in Para 69(c) that councils should support the development of windfall sites and give great weight to the use of suitable sites within existing settlements. However the weighting does not determine that locations for new sites should be exclusively grouped within those settlements. It should also be noted that there is no mention of formal boundaries to settlements within the NPPF so this would suggest that there is intended to be some flexibility towards sites which are adjacent but not isolated from the settlements. In fact Para 72(b) is clear that sites could be allocated on land adjacent to settlements as long as they are proportionate in size to them. The footnote 35 goes on to clarify that this land should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.</p> <p>SP1 determines that the focus of development in each spatial area will be required to follow the District-wide settlement hierarchy which takes account of the function and sustainability of settlements and promotes sustainable communities. Development and redevelopment within the settlement boundaries of those settlements will be supported. Outside of settlement boundaries, land will be treated as open countryside.</p> <p>This is not what the NPPF identifies as within that framework, there is no reference to settlement boundaries although it is clear however that isolated homes in the countryside should be avoided. A development which is small in nature but adjacent to a settlement or in West Berks terms a settlement boundary, should be supported.</p> <p>Within SP1 the Local plan does say that "Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings. However, lower density developments will be appropriate in certain areas of the District that are particularly sensitive to the impact of intensification and redevelopment. This may be because of the prevailing character of the area, the sensitive nature of the surrounding countryside or built form, and/or the relative remoteness from public transport." This appears to go against the policy of virtually no development outside a settlement boundary as identified in policy DM1. Further within SP1 the Local Plan identifies the opportunity for smaller non-strategic sites allocated in the LPR and in some neighbourhood plans, together with infill development, including that on windfall sites within settlement boundaries. Here once again the policy precludes any location outside a settlement boundary even those identified in the NPPF as being acceptable when adjacent to a settlement. Once again the word boundary is not included.</p> <p>Policy SP3 deals with;</p> <p>Urban Areas: Newbury, Thatcham, Eastern Urban Area (Tilehurst, Calcot, Purley on Thames)</p> <p>Rural Service Centres: Burghfield Common, Hungerford, Lambourn, Mortimer, Pangbourne, Theale</p> <p>Service Villages: Bradfield Southend, Chieveley, Cold Ash, Compton, Great Shefford, Hermitage, Kintbury, Woolhampton</p> <p>Both Urban and Rural locations have limited development opportunities and must meet the requirement for infill or changes of use within the settlement boundary.</p> <p>Development in smaller settlements with settlement boundaries, and which are not included in the settlement hierarchy, will be delivered in accordance with Policy SP1. Development outside of these settlements, in other rural hamlets and in isolated groups of development will be restricted to that which is appropriate in a rural area as set out in Policy DM1.</p>

	<p>Policy DM1 within the Local Plan proposal, will refuse any application for small potential windfall developments that do not meet that policy. This policy virtually precludes any development outside what the council identifies as a settlement boundary</p> <p>SP12 therefore is particularly restrictive and does not meet the requirements for development as provided for in the NPPF. This is mainly due to the heavy reliance and stated locations for developments within the Local Plan definition of "Settlement Boundaries". This restriction is reinforced with Policy DM1. This however does not comply with the directives of the NPPF and it therefore makes policy SP12 inconsistent with National Policy.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Butcher, Nigel
Consultee Full Name	Nigel Butcher
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS215
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	23/02/2023 12:11:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? -	

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I should like to register my objection to West Berkshire Council's LPR of 2023 for several reasons. The most basic reason is that updated guidance on these matters is due to be published later this year by the government and if this plan is proceeded upon it may become outdated and open to legal challenges if implemented leading to delays and missed targets. It is anticipated that the government's required numbers of houses in each area will be reduced, which is most significant. The plan also contradicts the national guidelines on impact on AONBs.</p> <p>There is insufficient information about who provided the information used in preparing this report, who paid the costs and who put it together. The plan has no explanation as to how it will be enacted in the time span covered by the report.</p> <p>The LPR lacks detailed and transparent supporting evidence to the assumptions used. This is particularly vital regarding the numbers and types of housing needed in the future. With the lack of substantive detail, it must be assumed that the any new estates will be the usual, high profit mix of executive and middle management houses. Given the current and foreseeable situation the biggest requirement must be affordable and social housing, true vision would provide a lot more of these types. The plans talk of a percentage of affordable housing but experience shows that the number of these reduce as developers find unforeseen profitability problems, the WBC roll over and a reduction in number is agreed. We should be catering for a high percentage of the types of housing all of the community need not just those with the income to buy.</p> <p>In the LPR there is no effective detail on mitigating the effects of the extra housing on the social, physical and environmental infrastructure. With the existing pressures on all of these no LPR can ignore this matter. The effects on traffic, schools, doctors, care homes, drainage, water supplies, education, countryside etc will be very significant. The plan does not address the need and cost for extra schools, GP surgeries, care provision, road improvements, new paths in local villages as commuting traffic increases. The roads around Newbury are already very busy and these plans will put extra traffic on all of the C roads as new rat runs to the motorway junctions become used.</p> <p>Any LPR should be looking at alternatives to simple large estates and there is no detailed confirmation this has been done. The capacity of smaller developments, brownfield sites, unbuilt planning permissions, and utility of other areas should all be quantified.</p> <p>All development plans should take into account their effect on the immediate and local communities. To provide large estates means smaller communities become one big urban sprawl to the detriment of living standards generally. For instance to enlarge Thatcham by 1500 to a potential 2500 would mean Thatcham,</p>

	Newbury and local villages like Cold Ash and Upper Bucklebury run one into another. Having resisted closing the green gap between Thatcham and Newbury for this reason it is ridiculous to propose this many houses around North Thatcham.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS232
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes	

* No	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
Please give reasons for your answer	<p><i>Extract of full response relevant to consultation point:</i></p> <p>These representations have been prepared by Southern Planning Practice on behalf of The Saunders Family who own the land east of Stoney Lane, Newbury, in response to West Berkshire's Regulation 19 Local Plan Review to 2037 Consultation.</p> <p>The site is located to the east of Stoney Lane which is in the north-eastern area of Newbury. The site is both closely related to the main urban areas of West Berkshire: Newbury and Thatcham.</p> <p>A small section of southern part of the site was submitted to the West Berkshire Housing and Economic Land Availability Assessment (HELAA) (2020) and was considered under site CA9 to be suitable, available and achievable. The site, land east of Stoney Lane, as a whole has not been previously assessed by the Council for its development potential. However, it is of note that the land immediately to the south west of the site, Land at Coley Farm, has been allocated through the Local Plan for the development of circa 75 homes. In fact, this site has full planning permission for 75 homes, this is set out in further detail under Policy</p>

RSA3 below. It is understood that Cala Homes has recently purchased this site and construction will commence in the near future. It is also understood that the land to the north of the site has developer interest and it was considered under site CA8 of the HELAA.

Southern Planning Practice submitted representations on behalf of the Saunders Family to the Regulation 18 version of the draft Plan published in February 2021. In addition to the responses, the representations set out the opportunity presented by the site whilst demonstrating the site is available, suitably located and achievable, considered against the definitions contained in the NPPF 2021, that would help meet West Berkshire's housing need.

The comments made in the previous representations are still relevant and these representations seek to provide comments on the changes made to the Regulation 19 Plan.

All references in these representations are to the revised National Planning Policy Framework (NPPF) published on 20 July 2021.

For full response see attachment.

Conclusion - Section 3 of the NPPF sets out that the planning system should be genuinely plan-led. Paragraph 16 makes it clear that plans should be prepared in a way that is aspirational but deliverable.

Paragraph 35 of the NPPF sets out the four tests for plans to be considered 'sound'. One of these tests is that the plan should be 'positively prepared'. As currently drafted, particularly in light of the inclusion of allocations which already benefit from planning permission and the reduction in housing provision, the local plan is not positively prepared and is unlikely to assist the Government in its objective to significantly boost the supply of new homes as it carries forward previous allocations which have failed to deliver and proposes new allocations which also may not deliver new homes or take a long time to provide new homes, when the need is now.

As highlighted throughout our representations to the Regulation 18 consultation, the council should be looking to allocate further sites of a range of sizes to provide a flexible, responsive and deliverable housing land supply. The land east of Stoney Lane is a suitable, sustainable site which, through allocation, would deliver homes within the first five years of the plan period.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Racecourse (Represented by Pro Vision)
Consultee Full Name	Newbury Racecourse
Consultee Organisation	Newbury Racecourse
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS525
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:14:00
Attached Files	Pro Vision (Newbury Racecourse).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Please see accompanying statement for our full representations.</p> <p>In summary, it is considered that the level of housing currently proposed is:</p> <ul style="list-style-type: none"> • insufficient to support the Government's objective of significantly boosting the supply of housing; • significantly below the Council's aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire; • does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and • The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites in identified in the HELAA. <p>In addition, there is concern that the Council expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period.</p> <p><u>Affordable Housing and Affordability Uplift</u></p> <p>The Vision at Chapter 3 of the Plan states that the Council will ensure that delivering "...housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability" [our emphasis].</p> <p>The Updated Housing Needs Assessment (dated, July 2022) prepared by Icenii (on behalf of the Council) confirms that there is a "notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the District" [our emphasis]. The conclusion adds that "the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise" [our emphasis].</p> <p>The report advises that the scale of affordable housing need is 697 dpa (a 188% increase on need following the Council's Housing Needs Assessment in 2020). This is also 136% of the standard method minimum LHN. Accordingly, the report advises that theoretically if 40% of all new housing delivered was for affordable housing around 1,740 dpa would be needed to meet West Berkshire's affordable housing need in full (paragraph 3.24). The Council's affordable housing position is clearly worsening.</p> <p>It is acknowledged that the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and thus reduce affordable housing needs) through the affordability uplift in the standard method. However, West Berkshire's past housing delivery rates have generally been in line - if not greater - than the current minimum LHN and yet affordability problems/affordable housing need remains pressing. As a result, not positively addressing the affordability problems and affordable housing need across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered, including in the Sustainability Appraisal (SA/SEA) for Policy SP12.</p> <p>For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement. Further, the current proposed level of housing is not aspirational and will not help the Council deliver its Local Plan 'Vision'. The Council's Vision provides the context of the Local Plan and, therefore, we observe that the strategic policies and housing requirements do not deliver these principles of the Plan and it will inevitably fail in meeting this key priority.</p> <p><u>The Buffer/Uplift</u></p> <p>The Council provide for a 5% buffer/uplift on the minimum LHN. The Council argue that this is to boost supply and have some built-in flexibility.</p> <p>The Council should be concerned that limiting the housing supply to only a 5% buffer will significantly restrict the delivery of new homes and therefore, amongst other issues, will further raise house prices to levels which create cost barriers to local residents and workers. There are many factors and variables that can affect housing supply, especially in such a constrained district, therefore there is clear justification for a significantly larger buffer. And the recent phosphates issue associated with the River Lambourn is a recent example of unforeseen issues affecting delivery of new homes.</p> <p>In addition, an appropriate buffer will support greater flexibility in the Plan if the anticipated housing supply does not deliver. This is considered further at Section 3 below.</p> <p>An appropriate uplift to the housing requirement is likely to fall between 10-20%. This would increase the Council's target housing requirement to 564 - 616 dpa, which would equate to finding a supply of 9,588 – 10,472 dwellings up to 2039. This follows the approach in other recently adopted Local Plans, including South Oxfordshire (c. 27% buffer), Maidenhead (c. 12% buffer), and North Herts (c. 13% buffer). Further, the draft Wokingham Local Plan currently includes a 20% buffer.</p> <p>The Regulation 18 version of the West Berks LPR included a 10% buffer/uplift. However, it is noted by the Council in the Housing Background Paper that they reduced this figure to 5% to provide a balance between boosting housing supply in the district while considering the limitations and constraints of a largely rural district (paragraph 2.33). This appears to be counter-intuitive; the greater level of constraint, the greater level of buffer is required to provide greater prospect of meeting the housing need, especially</p>

where one of the Plan's priorities is to improve affordability. Furthermore, the SA/SEA undertakes an analysis, at Appendix 4 Section 2.1, between LHN+ 5% and LHN+ 10%. The LHN + 10% scores significantly better with 'overall positive, with some significantly positive effects'. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue pressure. The SA/SEA therefore takes forward a flawed approach that does not fit with the objectives of the Plan.

The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district. Indeed, none of the key environmental constraints (e.g AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt, internationally protected habitats etc.), but instead will shape the form and direction of growth across the district via the broad spatial strategy. As such, there is no justification to identify such a reduction in the buffer, particularly as there is clear evidence of many more available sites in the HELAA to accommodate further growth.

Conclusion

Overall, it is considered that the level of housing currently proposed is:

- 1 insufficient to support the Government's objective of significantly boosting the supply of housing;
- 2 significantly below the Council's aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire;
- 3 does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and d) The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites identified in the HELAA.

It is considered that this justifies that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10 - 20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039. This level of housing will ensure sufficient flexibility to deliver the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire.

Accordingly, the Council's housing target does not meet the following tests for soundness: positively prepared, effective or consistent with national policy.

Meeting Housing Need

Housing Supply

The Framework, at paragraph 11 b), confirms that "strategic policies should, as a minimum, provide for objectively assessed needs for housing...". The LPR identifies several sources of housing supply across the plan period at Table 2 of the Plan. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.

Existing allocations

The history of some of these sites identified in the supply that do not currently have planning permission (around 95 units, excluding Sandleford Park West) or only have outline permission (392 units, excluding Sandleford Park East) or where a site's delivery has been continually delayed clearly does not support confidence in their timely delivery. As such, it is considered that a 10% non-implementation rate is factored in to, at least, some of this supply would provide a more robust strategy

Non-allocated Sites with planning permission

Table 2 shows that nearly 1,958 dwellings are provided on un-allocated sites (including prior approvals) with planning permission. Again, a 10% non-implementation rate should be applied to this figure to provide a more robust strategy as it is unlikely that all these permissions will be delivered.

Windfall allowance

The housing supply includes a windfall allowance of 1,949 dwellings (or 26.6% of the total housing supply) up to 2039. It has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 – 2022.

However, it is recommended that the Council remove or significantly reduce this windfall allowance to provide greater surety of supply through allocations and without having to rely on the use of a windfall allowance which by its nature is uncertain. The latest consultation on the revised Framework and the draft Levelling Up and Regeneration Bill also place a greater emphasis and need to provide a genuinely plan-led system.

The Council contend that delivery of windfalls has been consistent and reliable. The Council has not provided any evidence however about future supply to justify such an approach. There also appears to be a recent trend that opportunities for windfalls are reducing on small sites. As set out at Table 3.1 of the Housing Background Paper the delivery over the last three years 2019/20 to 2021/22 has reduced to an annual average of 97 completions. Indeed, in the last five years the annual average is also only 112 completions, notably lower than LPRs anticipation of 140 dpa.

In addition, it is also worth noting the windfall allowance is taken from smaller sites (i.e. less than 10 new homes) and, therefore, a reliance on sites for potentially between 1-4 dwellings in the housing supply will not deliver any affordable housing and further exacerbate affordable housing need within West Berkshire, contrary to the LPR's priority to improve affordability of housing for its existing and future residents.

As a result, the windfall allowance of around 140 dpa should be removed completely or significantly reduced given recent trends.

The implications of this are important. Even a relatively modest but more realistic reduction to 100 dpa would reduce immediately the total housing supply by, at least, 549 dwellings. The remedy is for more positive planning by taking forward more of the available sites from the HELAA. This will reduce the

reliance on windfall sites and provide greater surety of supply through allocations and improve overall affordable housing provision.

Future Supply

Notwithstanding the above comments regarding housing supply, the Plan explains that there is a need to identify sites for a further 1,809 dwellings to meet the 538 dpa target (or 9,146). The Plan allocates some 1,720 homes (which includes 1,500 at NE Thatcham) and a further 80 dwellings to come forward through Neighbourhood Plans.

Housing Trajectory

The Council are already slightly (9 dwellings) short of their housing target figure (LHN + 5%) rather than ahead of the target. However, it is considered that the housing trajectory during the plan period is unrealistic, particularly relating to the strategic allocations.

Sandleford Park (as allocated at Policies SP13 and SP16)

The Housing Background Paper, at Appendix 2, sets out the housing trajectory including the phasing of individual sites. The Council contend that Sandleford East (which benefits from outline planning permission) will begin delivering 100 dpa from 2025/26 through to 2034/35, with 80 dwellings provided during the year 2035/36.

This appears an optimistic timetable, particularly given the previous planning delays with the site (allocated in 2012), that a reserved matters application has yet to be submitted for any phase(s) and the need to address several planning conditions prior to commencement of construction. The start date of 2025/26 for first completions therefore seems very much a 'best case scenario'.

It is understood that the site is being delivered by a single housebuilder. This therefore could lead to a lower absorption rate due to lack of variety of housing product in accordance with the findings of Letwin's Independent Review of Build Out (October 2018). The 100 dpa across the plan period therefore is likely to be impractical and affect site delivery over the plan period.

With regards to Sandleford West, this site does not have any planning permission despite an outline application being submitted in April 2018. It appears that the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/8 is simply conjecture. There will also be a need to submit and agree reserved matters and address conditions ahead of that time.

With the above in mind, it is considered that the Council should take a cautious approach with the delivery of Sandleford Park during the plan period. The Regulation 18 Consultation on the LPR noted that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy.

Scale and timescales for Housing Delivery

Notwithstanding the above, the Council's assumptions on the expected housing supply from NE Thatcham are also clearly unreasonable.

The Housing Background Paper demonstrates that the Council expect NE Thatcham to start delivering 150 dpa from 2029/30 to 2038/2039. On the face of it, this appears to be overly optimistic.

The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), dated February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2024 in the LDS) and taking a view that the planning application for this site is submitted by the end of 2024/2025, first completions cannot be projected before 2031/2032. This timescale may be optimistic given there is a need to prepare and agree to a coherent masterplan or development framework, if prior mineral extraction is required and/or there are delays to the adoption of the Plan. In addition, as noted with Sandleford Park, the Council has a previous poor record of delivering strategic sites within their expected timescales.

Furthermore, market evidence suggests that for sites of 1,500, a realistic average annual build out rate is c.100-120 dpa (Source: Lichfield's Start to Finish (2nd Edition)). As such, delivering completions from 2031/32 at 120 dpa would therefore equate to, at best, 960 dwellings over the plan period. A shortfall of 540 dwellings.

Conclusion

The Housing Background Paper, at Table 3.4, sets out the housing supply and future supply for the Council during the plan period. The table below sets out a comparison with our analysis and findings above:

<table see attachment pg.12>

With the above in mind, it is considered that currently the Council's housing supply is not sufficient to meet the minimum LHN (8,721 dwellings). Indeed, even by just discounting the expected housing shortfall from NE Thatcham during the plan period, this would decimate any headroom built in by the 5% buffer/uplift and the Council's housing supply would fail to meet the minimum LHN (9,137 – 540 = 8,597).

Accordingly, the Council's approach to housing delivery does not meet the following tests for soundness: positively prepared, effective or consistent with national policy.

As a result, it is concluded that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy, and noting that many available sites in the HELAA including at 'land south of Newbury Racecourse' have been overlooked. The level of housing shortfall (potentially around 2,363 - 3,247 dwellings when providing a 10 - 20% buffer to the LHN in accordance with comments at Section 2) is substantial and, therefore, should be addressed through allocations in this Plan rather than any early/immediate review of the Local Plan, which would be to defer difficult, strategic planning decisions rather than demonstrating positive planning now.

	<Accompanying statement attached>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Please see accompanying statement for our full representations. In summary, it is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039. <accompanying statement attached>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Butcher, Liz
Consultee Full Name	Liz Butcher
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS214
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 12:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I should like to register my objection to West Berkshire Council's LPR of 2023 for several reasons. The most basic reason is that updated guidance on these matters is due to be published later this year by the government and if this plan is proceeded upon it may become outdated and open to legal challenges if implemented leading to delays and missed targets. It is anticipated that the government's required numbers of houses in each area will be reduced, which is most significant. The plan also contradicts the national guidelines on impact on AONBs.</p> <p>There is insufficient information about who provided the information used in preparing this report, who paid the costs and who put it together. The plan has no explanation as to how it will be enacted in the time span covered by the report.</p> <p>The LPR lacks detailed and transparent supporting evidence to the assumptions used. This is particularly vital regarding the numbers and types of housing needed in the future. With the lack of substantive detail, it must be assumed that the any new estates will be the usual, high profit mix of executive and middle management houses. Given the current and foreseeable situation the biggest requirement must be affordable and social housing, true vision would provide a lot more of these types. The plans talk of a percentage of affordable housing but experience shows that the number of these reduce as developers find unforeseen profitability problems, the WBC roll over and a reduction in number is agreed. We should be catering for a high percentage of the types of housing all of the community need not just those with the income to buy.</p> <p>In the LPR there is no effective detail on mitigating the effects of the extra housing on the social, physical and environmental infrastructure. With the existing pressures on all of these no LPR can ignore this matter. The effects on traffic, schools, doctors, care homes, drainage, water supplies, education, countryside etc will be very significant. The plan does not address the need and cost for extra schools, GP surgeries, care provision, road improvements, new paths in local villages as commuting traffic</p>

	<p>increases. The roads around Newbury are already very busy and these plans will put extra traffic on all of the C roads as new rat runs to the motorway junctions become used.</p> <p>Any LPR should be looking at alternatives to simple large estates and there is no detailed confirmation this has been done. The capacity of smaller developments, brownfield sites, unbuilt planning permissions, and utility of other areas should all be quantified.</p> <p>All development plans should take into account their effect on the immediate and local communities. To provide large estates means smaller communities become one big urban sprawl to the detriment of living standards generally. For instance to enlarge Thatcham by 1500 to a potential 2500 would mean Thatcham, Newbury and local villages like Cold Ash and Upper Bucklebury run one into another. Having resisted closing the green gap between Thatcham and Newbury for this reason it is ridiculous to propose this many houses around North Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bracknell Forest Council
<p>Consultee Full Name</p>	Bracknell Forest Council
<p>Consultee Organisation</p>	Bracknell Forest Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS218
<p>Chapter / Policy / Appendix Number</p>	Policy SP 12
<p>Chapter / Policy / Appendix Title</p>	Approach to Housing Delivery
<p>Order</p>	39
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	22/02/2023 12:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>A Local Housing Need figure of 513 dpa has been used (using a 2022 base date), equating to a minimum need of 8,721 dwellings over the plan period. If a 5% flexibility is added, this would increase the LHN to 538 (or 9,146 dwellings over the plan period). As such, proposed Policy SP12 includes a range of 8,721-9,146 dwellings.</p> <p>It is assumed that the LPR is meeting in full the general housing need for West Berks, and that there is no unmet need.</p> <p>Both BFC and West Berks are in the same housing market area (HMA) as Reading Borough, along with Wokingham (forming the Western Berkshire HMA). There is a signed Memorandum of Understanding with these authorities in relation to unmet need from Reading (dated August 2021), which sets out that this need will be met within the HMA. This relates to 230 dwellings in Reading's current Plan. It is noted that this is referred to within the LPR (paras. 6.5-6.7), however it is not stated how West Berks is intending (if at all) to help address this unmet need.</p> <p>The Inspector's post hearing letter relating to the BFLP, includes the following Main Modification in order to make the Plan sound:</p> <p>There is an unmet need within Reading Borough's adopted local plan (covering the period 2021 to 2036) of 230 dwellings, which is projected to arise in the second half of the plan period. As agreed by Western Berkshire HMA authorities [insert footnote], this unmet need will be accommodated in the HMA area.</p>

	<p>New footnote: Reading's housing needs: Memorandum of Understanding between the authorities in the Western Berkshire</p> <p>The Inspectors note that the BFLP demonstrates a housing supply of 10,780 dwelling, meeting the housing requirement of 10,438, which would include a buffer to contribute to Reading's housing needs if required.</p> <p>As yet, it is unclear how the unmet need is to be addressed by other authorities within the Western Berkshire HMA. Given that Reading Borough Council wishes the unmet need in its Plan to be met as close as possible to where the need arises (which includes parts of West Berks, being an adjacent authority to Reading, and encompassing part of wider urban area of Reading), it is considered that this matter should be reflected within the current LPR.</p> <p>Currently it does not appear to do so, and it is therefore considered that the LPR is unsound. This has implications for Duty to Co-operate, and it is therefore requested that further consideration is given to this matter.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Duff, Colin
Consultee Full Name	Colin Duff
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS424
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
<p>Submission Type * E-Mail * Letter</p>	Web

* Other * SMS * Web * Unknown	
Response Date	01/03/2023 14:49:19
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Given that only a small percentage of land in West Berkshire is free of planning restrictions, this places an enormous burden on the area and its residents of the small area that can be developed. New developments will fundamentally change the nature of the area in a way residents do not welcome, plus bring disturbance not only during building phases but forevermore because of the significantly increased population. This expansion is manifestly unfair on the residents of Newbury and Thatcham whilst the West Berkshire population outside of the two towns are unscathed. Surely the number of new houses required should be proportional to the area that is free of restrictions to take them? We should not be fitting the number of houses specified for a large district into such a small part of it. The result will be widening the divide between town and countryside that is not so great at the moment and will irrevocably change the ambience of West Berkshire. It should be taken into account that unless a considerable part of West Berkshire land is released from planning restrictions in the future there will be further pressure to build large number of houses around Newbury and Thatcham in the plan beyond 2039, and thus the size of new development needs to smaller and taken slower - in proportion to the amount of land free of planning restrictions.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	The plan will become sound if the amount of development is proportional to the ratio of land available for development compared to the overall area of the district.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rivar Ltd (Represented by Pro Vision)
Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS570
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:37:00
Attached Files	Pro Vision (Rivar) full response.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Please see accompanying statement for our full representations.</p> <p>In summary, it is considered that the level of housing currently proposed is:</p> <ul style="list-style-type: none"> • insufficient to support the Government's objective of significantly boosting the supply of housing; • significantly below the Council's aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire; • does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and • The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites in identified in the HELAA. <p>In addition, there is concern that the Council expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period.</p> <p><i>Extract from full representation relevant to consultation point (full response attached):</i></p> <p>Policy SP12 explains that provision will be made for 8,721 to 9,146 net additional homes for the period 1st April 2022 to 31st March 2039. It is acknowledged that the target figure of 538 dwellings per annum (dpa) does not constitute a ceiling or cap to development.</p> <p>The target figure of 538 dpa is a 5% uplift on the local housing need (LHN), as calculated using the standard method.</p> <p>However, it is considered that there is clear justification for higher housing growth in West Berkshire to meet the level of need identified in the evidence, not least in respect of addressing affordability.</p> <p>The Housing Requirement</p> <p><u>The Duty to Co-operate</u></p> <p>The Council, at paragraphs 6.5 to 6.8 of the Plan, note that there is a current unmet need from Reading Borough Council of around 230 dwellings up to 2036 and that there will be a need to consider any further unmet need given the housing needs generated by the standard method (i.e. the 35% uplift to Reading as one of the largest urban areas in England).</p> <p>The Council also notes that the distribution of any unmet need has not been agreed and will be subject to a further review through the plan making process before the need arises.</p>

Reading has identified that a five year review of its Plan is required by 2024. This will need to include an urban capacity assessment. A revised future unmet need figure is therefore likely to be available shortly. It is anticipated that the future unmet need from Reading will be significant – the housing requirement increases to 907 dpa from Lichfield’s analysis of the standard method for local housing need, dated April 2022 (from 689 dpa in the current Reading Borough Local Plan). However, at this stage without further evidence there is no certainty on what the unmet need will be or how it will be redistributed. However, it is widely accepted that Reading has limited land capacity to deliver these additional housing requirements in full and, therefore, highly likely that neighbours, including West Berkshire will be required to deliver in meeting some of this unmet need.

To address this expected significant future unmet need from Reading, it is considered that the Plan should include additional flexibility to address this future unmet need.

Affordable Housing and Affordability Uplift

The Vision at Chapter 3 of the Plan states that the Council will ensure that delivering

“... **housing of different types, sizes, tenures and affordability will be a priority** in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability” [our emphasis].

The Updated Housing Needs Assessment (dated, July 2022) prepared by Icenii (on behalf of the Council) confirms that there is a “notable need for affordable housing, and it is clear that provision of **new affordable housing is an important and pressing issue across the District**” [our emphasis]. The conclusion adds that “the evidence does however suggest that **affordable housing delivery should be maximised where opportunities arise**” [our emphasis].

The report advises that the scale of affordable housing need is 697 dpa (a 188% increase on need following the Council’s Housing Needs Assessment in 2020). This is also 136% of the standard method minimum LHN. Accordingly, the report advises that theoretically if 40% of all new housing delivered was for affordable housing around 1,740 dpa would be needed to meet West Berkshire’s affordable housing need in full (paragraph 3.24). The Council’s affordable housing position is clearly worsening.

It is acknowledged that the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and thus reduce affordable housing needs) through the affordability uplift in the standard method. However, West Berkshire’s past housing delivery rates have generally been in line - if not greater - than the current minimum LHN and yet affordability problems/affordable housing need remains pressing. As a result, not positively addressing the affordability problems and affordable housing need across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered, including in the Sustainability Appraisal (SA/SEA) for Policy SP12.

For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement. Further, the current proposed level of housing is not aspirational and will not help the Council deliver its Local Plan ‘Vision’. The Council’s Vision provides the context of the Local Plan and, therefore, we observe that the strategic policies and housing requirements do not deliver these principles of the Plan and it will inevitably fail in meeting this key priority.

The Uncertainty Buffer/Uplift

The Council provide for a 5% buffer/uplift on the minimum LHN. The Council argue that this is to boost supply and have some built-in flexibility.

The Council should be concerned that limiting the housing supply to only a 5% buffer will significantly restrict the delivery of new homes and therefore, amongst other issues, will further raise house prices to levels which create cost barriers to local residents and workers.

There are many factors and variables that can affect housing supply, especially in such a constrained district, therefore there is clear justification for a significantly larger buffer. And the recent phosphates issue associated with the River Lambourn is a recent example of unforeseen issues affecting delivery of new homes.

In addition, an appropriate buffer will support greater flexibility in the Plan if the anticipated housing supply does not deliver. This is considered further at Section 3 below.

An appropriate uplift to the housing requirement is likely to fall between 10-20%. This would increase the Council’s target housing requirement to 564 - 616 dpa, which would equate to finding a supply of 9,588 – 10,472 dwellings up to 2039. This follows the approach in other recently adopted Local Plans, including South Oxfordshire (c. 27% buffer), Maidenhead (c. 12% buffer), and North Herts (c. 13% buffer). Further, the draft Wokingham Local Plan currently includes a 20% buffer.

The Regulation 18 version of the West Berks LPR included a 10% buffer/uplift. However, it is noted by the Council in the Housing Background Paper that they reduced this figure to 5% to provide a balance between boosting housing supply in the district while considering the limitations and constraints of a largely rural district (paragraph 2.33). This appears to be counter-intuitive; the greater level of constraint, the greater level of buffer is required to provide greater prospect of meeting the housing need, especially where one of the Plan’s priorities is to improve affordability. Furthermore, the SA/SEA undertakes an analysis, at Appendix 4 Section 2.1, between LHN+ 5% and LHN+ 10%. The LHN + 10% scores significantly better with ‘overall positive, with some significantly positive effects’. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue pressure. The SA/SEA therefore takes forward a flawed approach that does not fit with the objectives of the Plan.

The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district. Indeed, none of the key environmental constraints (e.g AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt, internationally protected habitats etc.), but instead will shape the form and direction of growth across the district via the broad spatial strategy. As such, there

is no justification to identify such a reduction in the buffer, particularly as there is clear evidence of many more available sites in the HELAA to accommodate further growth.

Conclusion

Overall, it is considered that the level of housing currently proposed is:

- 1 insufficient to support the Government's objective of significantly boosting the supply of housing;
- 2 significantly below the Council's aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire;
- 3 does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs and
- 4 The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites identified in the HELAA.

It is considered that this justifies that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10 - 20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039. This level of housing will ensure sufficient flexibility to deliver the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire.

Accordingly, the Council's housing target does not meet the following tests for soundness: positively prepared, effective or consistent with national policy.

Meeting Housing Need

Housing Supply

The Framework, at paragraph 11 b), confirms that "strategic policies should, as a minimum, provide for objectively assessed needs for housing...". The LPR identifies several sources of housing supply across the plan period at Table 2 of the Plan. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.

Existing allocations

The history of some of these sites identified in the supply that do not currently have planning permission (around 95 units, excluding Sandleford Park West) or only have outline permission (392 units, excluding Sandleford Park East) or where a site's delivery has been continually delayed clearly does not support confidence in their timely delivery. As such, it is considered that a 10% non-implementation rate is factored in to, at least, some of this supply would provide a more robust strategy

Non-allocated Sites with planning permission

Table 2 shows that nearly 1,958 dwellings are provided on un-allocated sites (including prior approvals) with planning permission. Again, a 10% non-implementation rate should be applied to this figure to provide a more robust strategy as it is unlikely that all these permissions will be delivered.

Windfall allowance

The housing supply includes a windfall allowance of 1,949 dwellings (or 26.6% of the total housing supply) up to 2039. It has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 – 2022.

However, it is recommended that the Council remove or significantly reduce this windfall allowance to provide greater surety of supply through allocations and without having to rely on the use of a windfall allowance which by its nature is uncertain. The latest consultation on the revised Framework and the draft Levelling Up and Regeneration Bill also place a greater emphasis and need to provide a genuinely plan-led system.

The Council contend that delivery of windfalls has been consistent and reliable. The Council has not provided any evidence however about future supply to justify such an approach. There also appears to be a recent trend that opportunities for windfalls are reducing on small sites. As set out at Table 3.1 of the Housing Background Paper the delivery over the last three years 2019/20 to 2021/22 has reduced to an annual average of 97 completions. Indeed, in the last five years the annual average is also only 112 completions, notably lower than LPRs anticipation of 140 dpa.

In addition, it is also worth noting the windfall allowance is taken from smaller sites (i.e. less than 10 new homes) and, therefore, a reliance on sites for potentially between 1-4 dwellings in the housing supply will not deliver any affordable housing and further exacerbate affordable housing need within West Berkshire, contrary to the LPR's priority to improve affordability of housing for its existing and future residents.

As a result, the windfall allowance of around 140 dpa should be removed completely or significantly reduced given recent trends.

The implications of this are important. Even a relatively modest but more realistic reduction to 100 dpa would reduce immediately the total housing supply by, at least, 549 dwellings. The remedy is for more positive planning by taking forward more of the available sites from the HELAA. This will reduce the reliance on windfall sites and provide greater surety of supply through allocations and improve overall affordable housing provision.

Future Supply

Notwithstanding the above comments regarding housing supply, the Plan explains that there is a need to identify sites for a further 1,809 dwellings to meet the 538 dpa target (or 9,146). The Plan allocates some 1,720 homes (which includes 1,500 at NE Thatcham) and a further 80 dwellings to come forward through Neighbourhood Plans.

Housing Trajectory

The Council are already slightly (9 dwellings) short of their housing target figure (LHN + 5%) rather than ahead of the target. However, it is considered that the housing trajectory during the plan period is unrealistic, particularly relating to the strategic allocations.

Sandleford Park (as allocated at Policies SP13 and SP16)

The Housing Background Paper, at Appendix 2, sets out the housing trajectory including the phasing of individual sites. The Council contend that Sandleford East (which benefits from outline planning permission) will begin delivering 100 dpa from 2025/26 through to 2034/35, with 80 dwellings provided during the year 2035/36.

This appears an optimistic timetable, particularly given the previous planning delays with the site (allocated in 2012), that a reserved matters application has yet to be submitted for any phase(s) and the need to address several planning conditions prior to commencement of construction. The start date of 2025/26 for first completions therefore seems very much a 'best case scenario'.

It is understood that the site is being delivered by a single housebuilder. This therefore could lead to a lower absorption rate due to lack of variety of housing product in accordance with the findings of Letwin's Independent Review of Build Out (October 2018). The 100 dpa across the plan period therefore is likely to be impractical and affect site delivery over the plan period.

With regards to Sandleford West, this site does not have any planning permission despite an outline application being submitted in April 2018. It appears that the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/8 is simply conjecture. There will also be a need to submit and agree reserved matters and address conditions ahead of that time.

With the above in mind, it is considered that the Council should take a cautious approach with the delivery of Sandleford Park during the plan period. The Regulation 18 Consultation on the LPR noted that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy.

North East Thatcham (as allocated at Policies SP13 and SP17)

The Council has reduced the delivery of NE Thatcham from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council anticipate that NE Thatcham will deliver 1,500 homes over the plan period (compared to 1,250 dwellings expected at the Regulation 18 stage). For reasons we discuss below, this appears to be unjustified.

Scale and timescales for Housing Delivery

Notwithstanding the above, the Council's assumptions on the expected housing supply from NE Thatcham are also clearly unreasonable.

The Housing Background Paper demonstrates that the Council expect NE Thatcham to start delivering 150 dpa from 2029/30 to 2038/2039. On the face of it, this appears to be overly optimistic.

The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), dated February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2024 in the LDS) and taking a view that the planning application for this site is submitted by the end of 2024/2025, first completions cannot be projected before 2031/2032. This timescale may be optimistic given there is a need to prepare and agree to a coherent masterplan or development framework, if prior mineral extraction is required and/or there are delays to the adoption of the Plan. In addition, as noted with Sandleford Park, the Council has a previous poor record of delivering strategic sites within their expected timescales.

Furthermore, market evidence suggests that for sites of 1,500, a realistic average annual build out rate is c.100-120 dpa (Source: Lichfield's Start to Finish (2nd Edition)). As such, delivering completions from 2031/32 at 120 dpa would therefore equate to, at best, 960 dwellings over the plan period. A shortfall of 540 dwellings.

Conclusion

The Housing Background Paper, at Table 3.4, sets out the housing supply and future supply for the Council during the plan period. The table <see table at 3.25 in Full Response attachment> sets out a comparison with our analysis and findings above

With the above in mind, it is considered that currently the Council's housing supply is not sufficient to meet the minimum LHN (8,721 dwellings). Indeed, even by just discounting the expected housing shortfall from NE Thatcham during the plan period, this would decimate any headroom built in by the 5% buffer/uplift and the Council's housing supply would fail to meet the minimum LHN (9,137 – 540 = 8,597).

Accordingly, the Council's approach to housing delivery does not meet the following tests for soundness: positively prepared, effective or consistent with national policy.

As a result, it is concluded that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy, and noting that many available sites in the HELAA including at 'land at New Road, Newbury' have been overlooked. The level of housing shortfall (potentially around 2,363 - 3,247 dwellings when providing a 10 - 20% buffer to the LHN in accordance with comments at Section 2) is substantial and, therefore, should be addressed through allocations in this Plan rather than any early/immediate review of the Local Plan, which would be to defer difficult, strategic planning decisions rather than demonstrating positive planning now.

Conclusion

Rivar has concerns that the Council's Local Plan Review is currently unsound having regard to the tests of soundness at paragraph 35 of the Framework.

It is considered that there are a number of matters that indicate that the proposed strategy is not robust and, therefore, liable to fail in its objectives. There is justification to increase the housing requirement, to address these issues including:

	<ul style="list-style-type: none"> • The Plan's priority to improve affordability and to deliver additional affordable homes; • The need to boost supply significantly and to build in greater flexibility in the Plan if the anticipated housing supply does not deliver; and • Unmet need from neighbouring authorities (e.g Reading); <p>With the above in mind, it is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039.</p> <p>In addition, the Council's housing supply would fail to meet the minimum LHN. This is particularly due to reliance on windfall sites and large strategic sites (e.g Sandford Park and NE Thatcham) that are questionable in terms of timescales for housing delivery and annual rate of completions. The Council's justification for the allocation NE Thatcham is also potentially unsound, particularly given the lack of updated evidence and reduction in housing numbers.</p> <p>As a result, and noting the significant amount of available land in the HELAA that has been overlooked, it is concluded that the remedy is for the LPR is to allocate more sites for housing over the plan period, consistent with the broad spatial strategy i.e. focusing development on the most sustainable settlements, including Newbury, in accordance with the settlement hierarchy (Policy SP3/Table 1 District Settlement Hierarchy).</p> <p>Accordingly, we are of the view that the Council should consider 'land adjacent New Road, Newbury', in addition to other sites that have been overlooked in suitable locations, for allocation in the Local Plan Review. We contend that the site is suitable, available and achievable and therefore the Council has been premature and unjustified in declaring it undevelopable over the plan period and removing the allocation from the Plan. Its allocation would, in principle, be consistent with the settlement hierarchy. Alternatively, in this instance there is also an opportunity to simply amend the settlement boundary as part of the Council's review to provide additional opportunities for growth to help meet the Council's housing targets during the plan period.</p> <p>We trust this Statement clearly sets out our client's position at this stage and respectfully request that the above is given due consideration as part of the West Berkshire Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please see accompanying statement for our full representations.</p> <p>In summary, it is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039.</p> <p>As a result, it is concluded that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy, and noting that many available sites in the HELAA including at 'land at New Road, Newbury' have been overlooked. The level of housing shortfall (potentially around 2,363 - 3,247 dwellings when providing a 10 - 20% buffer to the LHN in accordance with comments at Section 2) is substantial and, therefore, should be addressed through allocations in this Plan rather than any early/immediate review of the Local Plan, which would be to defer difficult, strategic planning decisions rather than demonstrating positive planning now.</p> <p><Full response attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS240
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>We strongly object to the reduction in the number of homes to be delivered over the plan period. The housing provision has been reduced from 8,840 to 9,775 net additional homes to 8,721 to 9,146. This equates to a reduction of 119 – 629 homes over the plan period. Whilst we acknowledge that the target figure per annum ‘does not constitute a ceiling or cap to development’, as acknowledged previously the policy should be worded to set out that the objectively assessed housing should be a minimum (our emphasis) figure in accordance with paragraph 11 b) of the National Planning Policy Framework and the Planning Practice Guidance.</p> <p>It is noted at paragraph 6.23 that whilst the number of dwellings per annum over the plan period has reduced from 575 to 538, the number of dwellings which need to be found has increased from 1,661 homes to 1,809. In addition paragraph 6.28 of the consultation documents sets out that the Council’s 5 year housing land supply has fallen from 7.67 years to 6.4 years. Such a dramatic fall in supply, whilst still above the 5 year requirement, indicates that further development sites should be allocated to bolster this supply.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Town Council
Consultee Full Name	Mr Hugh Peacocke
Consultee Organisation	Newbury Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS574
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 10:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The Planning and Highways Committee of this Council considered the above matter on Monday 20 February.</p> <p>The meeting considered Policy SP 12 in the LPR " Approach to housing delivery" and expressed concern that the Brownfield Register and allowances for windfall sites around Newbury were significantly understated in the LPR. This in turn was increasing the allocation of greenfield sites, contrary to guidance and policy in the NPPF. The Committee estimated that there was a shortfall in the region of 500 dwellings including the LRIE site, the lands adjacent to Bayer, the Kennet Centre redevelopment, Mayfield Point, the Magistrates Court and the Phoenix Centre. It was felt that excluding these larger sites and the number of new dwellings they most likely would deliver during the Plan period was unreasonably modest.</p> <p>The meeting resolved that Newbury Town Council requests that the site allocations in the Newbury Settlement Area in the LPR be reviewed having regard to increased housing supply through the Brownfield sites and in particular the known larger windfall sites.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Hayter, Lynn</p>
<p>Consultee Full Name</p>	<p>Lynn Hayter</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS671</p>

Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:44:53
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states: “(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. (2) The report shall identify, describe and evaluate the likely significant effects on the environment of— (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”</p> <p>The SA/SEA Environmental Report describes how only a single alternative was considered in the Interim SA/SEA for the Regulation 18 consultation. For the Regulation 19 Consultation, two alternatives are considered, for 1,500 homes and 2,500 homes. No explanation is given as to why other alternatives with fewer than 1,500 homes were not considered.</p> <p>One ‘reasonable alternative’ that should have been considered is to divide the required number of homes between two sites (or perhaps even more). The SA/SEA states that “A large strategic site can deliver a number of positive benefits”. This is undoubtedly true, but the opposite is not inherently false, as evidenced by the analysis in Section 2-Soundness below:</p> <ul style="list-style-type: none"> -The NE Thatcham site would have two primary schools, so two smaller sites could have one school each. -The provision of a GP surgery is not related to the number of houses; it would be provided by the proposal for 1,500 houses but not the one for 2,500 houses. -The site is stated to have “local centres providing local retail facilities and small-scale employment for community use”. If there are several local centres, then they could be distributed. Issue: SA/SEA Appraisal for Policy SP17 – number of homes <p>Section/paragraph: 6.61 Policy: SP17 – number of homes Appendix: Policies Map: Other: Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) November 2022</p> <p>between several smaller sites.</p> <ul style="list-style-type: none"> -A site of either 1,500 or 2,500 homes is not sufficient by itself to support the provision of secondary education. <p>The SA/SEA for Policy SP13 states: “Due to the proposed strategic allocation in Thatcham, it is not considered appropriate to allocate any further sites in Thatcham and therefore, no other sites have been assessed.”</p> <p>The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policies SP1 and SP13 are therefore not legally compliant, because they have not considered all of the ‘reasonable alternatives’ to a single development of 1,500 homes.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	A review of Table 30 should be part of a wider review of the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) in relation to North East Thatcham.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Molloy, Stephanie
<p>Consultee Full Name</p>	Stephanie

	Molloy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS457
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	No

* No	
Please give reasons for your answer	<p>I object to the West Berkshire Local Plan Review 2022-2039 proposed submission as it is unsound, due to the following reasons:</p> <p>West Berkshire Council needs to understand that this is a rural county, not a built up conurbation. This is how the A4 will end up if Policy RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4); Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation and Policy RSA9 Land between A340 and The Green, Theale (Site Ref: HSA 14) are allowed to go ahead. Being a rural council, and due to the landscape, West Berkshire is never going to be a rich council due to the number of inhabitants. But it must remember that each and every one of its inhabitants is entitled to a decent quality of life, easy and acceptable access to work; home; food provision; activities in the open air; decent healthcare provision for both health and dentistry; and schooling for all ages, and in my view this plan does not support that.</p> <p>Brownfield sites should be used first and not just built to make up government target numbers.</p> <p>In addition, what also needs to be considered is the change to planning rules/guidance which is due to come from the Government in 2023, after Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement (https://questions-statements.parliament.uk/written-statements/detail/2022-12-06/hcws415) detailing that the housing number should now be an advisory starting point and not mandatory.</p> <p>This plan is unsound and should be looked at in more detail before the next submission.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Earl, Kimble
Consultee Full Name	Kimble Earl
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS561
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery

Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 09:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The Plan appears to be based on an outdated concept of housing targets. These targets were previously binding, but recent policy changes announced by Housing Secretary Michael Gove mean they are now advisory. West Berkshire Council therefore had the opportunity to set their own more enlightened target of allowing building only on brownfield, previously developed land, of which there are over 45 hectares in the district, which could accommodate over 2,500 homes. Given that so many GP surgeries are no longer accepting new patients, and other similar examples of overstretched local resources, 2,500 new homes would be a stiff target to meet but at least one based on the logic of not removing farmland from food production or harming the countryside in general.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>The Plan appears to be based on an outdated concept of housing targets. These targets were previously binding, but recent policy changes announced by Housing Secretary Michael Gove mean they are now advisory.</p> <p>West Berkshire Council therefore had the opportunity to set their own more enlightened target of allowing building only on brownfield, previously developed land, of which there are over 45 hectares in the district, which could accommodate over 2,500 homes. Given that so many GP surgeries are no longer accepting new patients, and other similar examples of overstretched local resources, 2,500 new homes would be a stiff target to meet but at least one based on the logic of not removing farmland from food production or harming the countryside in general.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Limes Leisure Investments (Represented by Knight Frank)
Consultee Full Name	Limes Leisure Investments
Consultee Organisation	Limes Leisure Investments LLP
Agent Full Name	Emily Brosnan
Agent Organisation	Knight Frank
Comment ID	PS590
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:43:17
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Under Policy SP12, we support the position that the housing target set out in the draft Local Plan "does not constitute a ceiling or cap to development".
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>In terms of windfall sites, we recommend that a range of sites should be considered to constitute windfall sites and should not just be limited to small sites.</p> <p>In terms of housing supply, we recommend that a complete housing supply table is prepared as currently shown Table 2 does not add up to the total housing target.</p> <p>By adopting this approach, the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)
Consultee Full Name	Natasha Styles
Consultee Organisation	The Planning Bureau on behalf of McCarthy Stone
Agent Full Name	Natasha Styles
Agent Organisation	The Planning Bureau on behalf of McCarthy Stone
Comment ID	PS563
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 09:16:58
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.</p> <p>Policy SP12 identifies that ‘Provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2039; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development’. Para 11.18 of the Local Plan review identifies that ‘The need for specialist housing for older people in the District is estimated to be around 1,710 units over the 2021-39 period (95 per annum) (West Berkshire Local Housing Needs Assessment (LHNA), 2012, Table 5.8).’ Specialist housing for older people therefore makes up between 18.7% and 19.6% of the total housing requirement. This is a significant proportion of the housing requirement, and the emerging plan must emphasise and be more supportive of delivering specialist housing for older people to be in accordance with national policy and effective.</p> <p>Government’s policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:</p> <p><i>“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”</i></p> <p>The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.</p> <p>In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:</p> <p><i>“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking” (emphasis added)</i></p> <p>Paragraph 003 Reference ID: 63-003-20190626 recognises that:</p> <p><i>“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”</i></p> <p>Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:</p> <p><i>“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”</i></p>

	<p>Therefore, the Local Plan should, especially given the substantial need identified within para 11.18 of the draft plan, recognise that housing for older people has its own requirements and should be given more emphasis within the Plan. For the Local Plan review to be consistent with national policy SP12 should be amended to include the provision of specialist housing for older people.</p> <p>Recommendation</p> <p>For the plan to be consistent with national policy, the following text should be added to para 1 of Policy SP12:</p> <p><u>'This includes the provision of 1,710 units (95 units per annum) to meet the specialist housing needs of older people'.</u></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>For the plan to be consistent with national policy, the following text should be added to para 1 of Policy SP12:</p> <p><u>'This includes the provision of 1,710 units (95 units per annum) to meet the specialist housing needs of older people'.</u></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North Wessex Downs AONB
Consultee Full Name	Rebecca Davies
Consultee Organisation	North Wessex Downs AONB
Agent Full Name	
Agent Organisation	
Comment ID	PS717
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p>	Web

* Web * Unknown	
Response Date	03/03/2023 13:54:28
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The AONB does not consider it appropriate to take some of the un met need from a neighbouring authority given the existing constraints of the Local Authority which limits the areas available for development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Follow a reduced figure of 513 max.
5. Independent Examination - If your representation is seeking a change, do you consider it	No

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Trustees of Allan Snook Will Trust (Represented by Pro Vision)
Consultee Full Name	Trustees of Allan Snook Will Trust
Consultee Organisation	Trustees of Allan Snook Will Trust
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS658
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>In summary, it is considered that the level of housing currently proposed is:</p> <ul style="list-style-type: none"> • insufficient to support the Government's objective of significantly boosting the supply of housing; • significantly below the Council's aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire; • does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and • The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites in identified in the HELAA. <p>In addition, there is concern that the Council expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period.</p> <p>Policy SP12 explains that provision will be made for 8,721 to 9,146 net additional homes for the period 1st April 2022 to 31st March 2039. The target figure of 538 dpa is a 5% uplift on the local housing need (LHN), as calculated using the standard method.</p> <p>However, it is considered that the level of housing currently proposed is:</p> <ul style="list-style-type: none"> • insufficient to support the Government's objective of significantly boosting the supply of housing; • significantly below the Council's aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire; • does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and • The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites in identified in the HELAA. <p>It is considered that this justifies that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10 - 20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039.</p> <p><u>Housing Supply</u></p> <p>There is concern that the Council expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period due to:</p> <ul style="list-style-type: none"> • need to apply a 10% non-implementation rate to the 'committed' housing supply where appropriate. • the over-reliance on a windfall provision, which by its nature is uncertain; • the need to undertake further evidence to justify the deliverability and viability of NE Thatcham; and • the unrealistic housing provision/trajectory during the plan period for the strategic allocations at both Sandleford Park and NE Thatcham. <p>The level of housing shortfall (potentially around 2,363 - 3,247 dwellings when providing a 10 - 20% buffer to the LHN in accordance with the comments above) is substantial and, therefore, should be addressed through allocations in this Plan rather than any early/immediate review of the Local Plan, which would be to defer difficult, strategic planning decisions rather than demonstrating positive planning now.</p> <p>As a result, it is concluded that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>In summary, it is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039.</p> <p>In the context of the concerns about the vulnerability of the submitted development strategy, and the obvious remedy to identify a greater yield of new homes from the available sites in the HELAA, we turn to our client's land which was overlooked ('Land south of the Recreation Ground, Boxford (HELAA Ref: BOX1)').</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS707
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	No
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
Please give reasons for your answer	<p>Sandleford Park West (SPW)</p> <p>Policy SP12 – Approach to Housing Delivery: Table 2 which supports this Policy identifies that Sandleford Park will deliver 1,580 units within the Plan period. This target is considered to be a robust prediction which my client supports. There is however, conflict with the following Policy in the Plan (Policy SP13 – Sites allocated in Newbury and Thatcham), between the figures cited for Sandleford Park Strategic Site whereby Policy SP13 identifies a figure of only 1,500, 80 units less than SP12. On the basis the Secretary of State has already approved 1,080 on land controlled by Sandleford Farm Partnership/Bloor Homes, the figure contained in Policy SP12 is the correct figure to include within the submission plan.</p> <p>As a point of consistency Policy SP13 refers to Sandleford Park as just that ('Sandleford Park') whereas, Table 2 of Policy SP12 refers to it as 'Sandleford Park Strategic Site'. To further confuse matters, in Policy SP16 which actually allocates the site, it is referred to as 'Sandleford Park Strategic Allocation'. The Plan should be consistent throughout in its reference to the name given to each site to ensure that the Plan is clear and consistent.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p>	No

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Slough Borough Council
Consultee Full Name	Slough Borough Council Planning
Consultee Organisation	Slough Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1072
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 22:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>Housing need</p> <p>We note that the West Berkshire Local Plan Review Proposed Submission consultation proposes to provide for between 8,721 and 9,146 houses within the district (Policy SP12), meeting the identified local housing need of 513 homes per annum (para 6.10). We note that the upper end of the housing range exceeds the local housing need figure and that it is not a maximum figure for development (Policy SP12). We support the proposal for West Berkshire to meet its identified housing requirement in full within the district.</p> <p>Slough Borough Council is not in the same housing market area as West Berkshire. Slough Borough Council is unable to meet its housing need in full and is cooperating with a neighbouring authority to seek to address the provision of housing to meet Slough's unmet housing need.</p> <p>Should West Berkshire reduce its housing land provision as the West Berkshire Local Plan progresses, such that it would not be seeking to accommodate its housing need in full within the district. This would potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Kimberley Parry
Agent Organisation	Neame Sutton Ltd
Comment ID	PS630
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:08:00
Attached Files	Neame Sutton (Donnington New Homes) Appendix A.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	No

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The strategic objectives and housing requirement set out in the Submission Plan are addressed in the Representations to the West Berkshire Local Plan Review Consultation (Regulation 19) Matters Relating to Housing Needs and Supply, prepared by Pegasus Group (January 2023) (Appendix A) and are not, as a result, repeated here.</p> <p>The analysis by Pegasus Group highlights the shortcomings of the Submission Plan with reference to housing provision:</p> <ul style="list-style-type: none"> • An insufficient buffer to allow for flexibility and to ensure that the local housing need (LHN) is met in full over the Plan period. • A larger buffer could be provided with no additional negative affects against the Sustainability Appraisal objectives and would provide additional positive benefits. • The current unmet need of Reading is not adequately provided for. • The likely future unmet need of Reading should be planned for now, and the Submission Plan should include flexibility to provide for that need as part of the Duty to Co-operate. • There is a clear case for an uplift to the housing provision to account for the identified affordable housing need of the area. • The reliance on a single, large strategic site for the delivery of most of the residual housing requirement, emphasises the need for a sufficient buffer to offset the potential under-delivery of the Plan. • A potential shortfall in the five-year housing land supply from the intended date of adoption of the Plan. <p>It is clear, as a result, that there is an urgent need for more housing in West Berkshire and, therefore, a need to increase the housing requirement within the Submission Plan.</p> <p>Should the Council not take this opportunity to address the urgent need for more housing, it is likely that the Submission Plan will fail to meet the necessary test of soundness in terms of providing an effective and justified housing delivery strategy, which meets the needs of the community over the Plan period.</p> <p>Of fundamental importance is the issue of unmet need from Reading. The failure of the Council to address the unmet need arising from Reading, now and in the future, puts the Submission Plan at risk of failing the necessary Legal Compliance test. A failure in terms of Legal Compliance cannot be addressed retrospectively through modifications in the same way that a matter of soundness can. If the Submission Plan fails the Legal Compliance test, the examination cannot continue, and the plan making process must recommence.</p> <p>The unmet need arising from Reading must, therefore, be fully addressed now.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The primary amendments necessary for the Submission Plan to be found found and to meet the Legal Compliance tests are summarised as:</p> <ul style="list-style-type: none"> • An increase in the housing requirement to fully account for the local housing need across West Berkshire.

	<ul style="list-style-type: none"> • Inclusion of a buffer to the housing requirement to insulate against non-delivery during the Plan period. • Reconsider the Spatial Strategy to direct more housing to settlements, such as Hungerford, to ensure a better distribution of development, more reflective of the needs of the community. • Fully addressing the unmet need arising from Reading to ensure the Legal Compliance test is met. • The allocation of further sites to enable a rolling five-year housing land supply, maintained over the Plan Period, of which Donnington New Homes' promotion site at Smitham Bridge Road for approximately 34 new homes and Marsh Lane for allotments, is a prime example of the suitable, available, and achievable sites that can come forward.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1139
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Objection</p> <p>The overall housing requirement of between 8,721 to 9,146 between 1 April 2022 and 31 March 2039 or 513 to 538 dwellings per annum is unlikely to be inadequate to meet housing needs.</p> <p>It is appreciated that the Government's final method for calculating the housing requirement is in a state of flux currently</p> <p>Whilst it is understood that these figures used by the Council are not a ceiling or cap, nevertheless as a minimum requirement reflecting need they are unlikely to be adequate. The LPR itself states that the PPG requirement may be higher and the needs from adjoining Authorities need to crystallise.</p> <p>There are two principal reasons for this being inadequate,</p> <p>The first is that (as we have stated elsewhere) there is no final information on the housing requirement likely to have to be met from adjoining Boroughs such as Reading, Wokingham or Swindon through the Duty to Cooperate etc and where this would be located.</p> <p>Secondly it is appreciated that the Council made the housing needs calculation based upon the mechanism appertaining at the time but of course the Government's new mechanism for housing need calculation is likely to result in a higher figure.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Please see other submissions on this specific point <See Rep ID: PS1170></p>

4. Proposed Changes	Update the overall housing requirement to meet the need arising from the duty to cooperate when this is established and based upon the Government's latest mechanism for calculating housing need.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We do not consider the LPR is sound and would like to participate in the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1260
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>If “achieving sustainable development” requires a Plan to provide new housing as far as possible within settlements and on previously developed land, then the allocation of 2,500 homes in North East Thatcham (SP17), of which a minimum of 1,250 are to be delivered by 2039 in this Plan period, shows the Plan is not Positively Prepared.</p> <p>6.16 states that there were 1,958 units already approved on windfall sites – presumably of all sizes – as at 31 March 2022. 6.19 cites NPPF 68 “giving great weight” to such sites and 6.20 links to local evidence in the Council’s Register of Brownfield Sites and admits that already they “have consistently played an important role in” the District’s housing supply.</p> <p>However, by only taking account of small windfall sites, despite there being several large and medium sites within settlements with planning consent and featuring in the Register of Brownfield Land, the Policy’s supporting text (6.19) takes far too cautious an approach to contribution of windfall to housing supply in the Plan period under review. This is what seems to result in the choice of NET and it makes the Plan (as we set out in more detail in SP17) unsustainable in all three dimensions:</p> <ul style="list-style-type: none"> • Environmental. In particular: <ul style="list-style-type: none"> • The NET site will be a typical car-dependent community, more so than a development closer to the town centre and/or south of the A4, let alone sites within urban settlements on brownfield land. • Placing development on this hillside is likely to add to the surface water drainage problems and potential for flash flooding. • Social <ul style="list-style-type: none"> • Residents of NET will be further from town centre facilities and opportunities for social engagement. This will likely create mental health and anti-social behaviour issues as the development is built out. • Economic <ul style="list-style-type: none"> • The gross under-estimate of the cost of a new secondary school (from £38m to only £5m – apparently across the whole District - in Jan23 IDP) will put economic pressure on the LEA to provide for education and on the wider CIL capital funding across the District. <p>We believe there is evidence that at least 500 of the 1,250 homes allocated in this Plan period for NET could be instead more sustainably be located within settlements, mainly on two large sites in Newbury. These two alone could deliver at least 340 units between them and easily be expected to achieve full build-out by 2039, with relatively little need for off-site infrastructure.</p> <p>In addition to these urban sites in or adjacent to Newbury town centre with a planning history indicating they are deliverable, there are several other medium/large sites listed in the Register and included in the Five Year Housing Supply that have planning permission or are deemed deliverable and could between them</p>

	<p>deliver over 250 dwellings just in the five year period to 2027 within other settlements. These are assumed to be part of the 1,958 figure in Table 2, although that is not clear in the current draft Local Plan, which does not refer to a full breakdown of the figure.</p> <p>Since the definition of ‘windfall site’ has been significantly broadened to include “Sites not specifically identified in the development plan”, not just sites “that unexpectedly became available”, we can see no justification for asserting there is no need for a significant windfall allowance from medium/large sites that are known to the LPA as potentially deliverable over the remainder of the Plan period, if such sites are included in the Five Year Land Supply. Small windfall sites have only accounted for about one third of the total actual windfall numbers over the current Plan period, so will almost certainly not deliver most of the windfall in future.</p> <p>We believe that tackling the Climate Emergency really is top priority for any LPA, so the definition of “exceptional” designs and circumstances (in policies SP2, SP11 & DM1) with respect to new development in the countryside and in villages throughout the District must include proposals for minor housing developments to meet local community and business needs, especially where these can be shown to be zero carbon. It should also include brownfield sites adjacent to but not yet within larger settlements, some of which have been included in the HELAA.</p> <p>In addition, we would expect more NDPs to be declared by parishes across the District and for these to produce a significant number of housing sites. We would be encouraging this.</p> <p>We estimate that the combination of planned (through NDPs) and medium/large windfall could amount to at least 200 additional homes per year within, adjacent to or near settlement areas, thereby improving the sustainability, in economic and social dimensions, of rural communities – and in all three dimensions of sustainability (through reducing the need to use the private car) of urban areas.</p> <p>The ways in which rural communities access services now involve far less travel by private car. As the roll-out of 5G broadband, EV charging infrastructure, online consultations and learning etc. proceeds, it must be assumed that there will less need for large suburban housing estates favoured by the small number of national homebuilders who have come to dominate the housing market. So the choice of a 2,500 homes strategic site (NET) is not Justified.</p> <p>We comment on several other policies in the Plan in a similar vein but for policy SP12 we believe there need only be minor changes in the supporting text and in the tables (see below).</p> <p>As regards consistent with national planning policy and the NPPF, this version of our Plan was published just after a Ministerial Letter on 6th December from the SoS, a letter sent by him to LPAs at the same time and publication by DLUHC on 22nd December of a draft new NPPF for consultation ending on 2nd March at around the same time as this LPA’s Reg19 consultation. Furthermore there is another “fuller update” of the NPPF, thought to be specifically in the light of the Climate Emergency declared by Government in 2018, due before the end of the year, according to the Chief Planner’s January 2023 newsletter.</p> <p>So it is not surprising that LPAs at a similar stage with Plan making as this Council – including Mr Gove’s own – are pausing their process. The Liberal Democrat Group, which forms the main opposition at this time but could be in control of Council policy by the time there is an Inspector appointed to examine our Plan, is also minded to pause the process for West Berkshire’s Plan until national policy becomes clearer.</p> <p>While national policy seems internally inconsistent, it is very difficult for all those involved in housing development to understand it. The remarkable churn in senior post holders, from Minister and Chief Planner downwards, does not help the development industry plan for the future and seems to reflect (or perhaps cause) uncertainty. Nevertheless it appears most likely that Plan submission will have occurred before an entirely new Council for West Berkshire is elected in May.</p> <p>On windfall numbers, we have said that the extremely modest figure seemingly based on an outdated definition of windfall also demonstrates that this policy is not consistent with national policy.</p> <p>Our comments here and elsewhere are therefore submitted in the hope that the Inspector will consider requiring changes broadly in accordance with them to be made as Modifications to the Plan in order to make it sound. There is much in the Plan as submitted that finds the support of the Liberal Democrat Group, in particular the fact that tackling Climate Change is the top strategic priority.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>In respect of SP12 only. See comments on SP17 <Comment ID: PS1269></p>
<p>4. Proposed Changes</p>	<p>In 6.20, delete all from “<i>The windfall allowance of 140....</i>” in line 3 and replace with: <i>“The windfall allowance of 340 dwellings per annum is consistent with the figures for windfall sites on brownfield land within settlements, as listed in the Register of brownfield sites. The figure includes all sites in the Register that are not already completed or under construction but that have planning consent and are shown as deliverable, plus other windfall sites of all sizes that based on recent local historical evidence may come forward through the development management system during the Plan period. The windfall figure for actual completions per annum during the current Plan period (from 2006/7) is 383.”</i></p> <p>In Table 2 on the same page, replace the last two figures (1,949 and 7,337) with 3,225 and 8,613 respectively.</p> <p>In 6.21, replace the figures 1,809 and 7,337 with 533 and 8,613 respectively.</p> <p>In 6.22, replace the figures 1,720 and 1,500 with 720 and 500 respectively.</p>

	Appendix 8 (Housing Trajectory) will need reviewing.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We would wish to clarify the changes in the light of the latest evidence. This is probably the most significant of all changes we are proposing to the current emerging Plan. In particular we wish to explain why we believe the two large brownfield sites in Newbury that are both largely in fluvial flood zone 2 should be regarded as deliverable in the Plan period and should be included as windfall.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS830
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf PS830 Paula Saunderson - Chichester allocations table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP12 – APPROACH TO HOUSING DELIVERY – for Newbury Sub-Area</p> <p>I want to see clear figures for the Newbury Settlement in a table such as this taken from the Chichester Section 19 consultation which is happening at the same time as this one and has far better presentation for the residents to understand.</p> <p>CASE STUDY - The Tables of Housing Allocations are much easier to understand and are broken down into Sub Areas. And there are supporting lists for each sub-area to breakdown the Figures at a and b in the table below so that Town & Parish Councils can see what is already promised and planned for and what is clearly the extra requirement for their sub-area, and the OVERALL Number of new Households and Office/Industrial Space that will arrive within our Settlement and use the Infrastructure.</p> <p>https://chichester.oc2.uk/document/45/366#d366</p> <p>[See attachment 'PS830 Paula Saunderson – Chichester Allocations Table']</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	Yes

* No	
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS534
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:28:49
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>The policy proposes meeting the identified local housing need for West Berkshire in full, and expresses a range with local housing need at the lower end of the range. There is therefore flexibility to deliver housing over and above local housing need. RBC therefore supports the policy.</p> <p>As recognised in the supporting text, the Reading Borough Local Plan includes a small unmet housing need of 230 homes over the plan period to 2036, based on the level of need assessed during the Strategic Housing Market Assessment. This matter is subject to a Memorandum of Understanding between WBDC, RBC, Wokingham Borough Council and Bracknell Forest Council signed in August 2021. This plan does not specifically make any allowance for meeting these unmet needs, but we recognise that the flexibility inherent in the dwelling range expressed, in combination with the plans of other authorities, will enable these unmet needs to be met. This matter will however need to be revisited as part of RBC's Local Plan Review, due to commence in 2023, given that the standard methodology would significantly increase Reading's housing need. It should therefore be noted that the matter of unmet housing need will need to be revisited in a future Local Plan review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rectory Homes Ltd
Consultee Full Name	Steven Kerry
Consultee Organisation	Rectory Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS756
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 10:09:00
Attached Files	Rectory Homes REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><i>[For full response see attached document]</i></p> <p>Rectory Homes have a number of concerns regarding Policy SP12 as currently drafted and also the evidence supporting the policy. Firstly, the policy sets a range of homes to be delivered within the Plan period of between 8,721-9,146 new dwellings. It is therefore unclear what is the minimum housing requirement to be delivered through the Plan. The housing requirement should be presented as a single figure so that decision makers are aware what is the minimum requirement when determining accurately the housing land supply position within the District.</p> <p>Secondly, as highlighted earlier within these representations, there is an identified unmet housing need from Reading Borough Council that is not currently accounted for within the emerging local plans for any other LPAs within the wider West Berkshire HMA. The unmet need from Reading Borough Council amounts to 230 dwellings which is a relatively low level to be accommodated elsewhere within the HMA. The emerging Bracknell Forest Local Plan has already been through examination in public and is proceeding towards main modifications which will secure the adoption of the Plan. The Plan does not allocate any additional sites to accommodate the unmet need from Reading Borough Council.</p> <p>This unmet need will therefore have to be met either within the emerging West Berkshire Local Plan Review or the emerging Wokingham Borough Local Plan. The Council have halted preparation on the emerging Wokingham Borough Local Plan whilst the proposed changes to national planning policy (NPPF3) are subject to consultation. As such, at this stage there is no indication that the unmet need will be met within the emerging Wokingham Borough Local Plan. To ensure Reading Borough Council's unmet need is met, West Berkshire Council and Wokingham Borough Council should provide a memorandum of understanding committing to deliver these homes through either one individual local plan, or a combination of the two.</p> <p>Thirdly, based on the Council's anticipated trajectory of housing supply, upon expected adoption of the Plan in 2024/25 the housing land supply will be marginal - allowing very little margin for any delays in deliverability. Currently, the Council are proposing to introduce a 5% buffer. However, given the possibility that the Plan may be out-of-date shortly after adoption, it is clear that a larger buffer should be incorporated to account for any unforeseen delays to the delivery of housing and therefore ensure the housing land supply remains greater than five years.</p> <p>Fourthly, approximately 20% of the Council's supply is anticipated to comprise the delivery of windfall sites. This is based on a windfall allowance of 140 dwellings per annum. There is no certainty that this level of windfall sites will be delivered, particularly given the requirements for acceptable development on windfall sites outlined in Policy CP3 as currently drafted. As per our comments, we consider the criteria specified too restrictive to deliver a meaningful level of housing outside of the top tier settlements.</p> <p>Paragraph 69 of the NPPF states local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than a hectare in size. Whilst it is commendable that the Council are seeking to deliver a greater proportion of their supply on smaller sites beyond the minimum specified in the Framework, we are concerned that reliance on windfall sites alone to meet this requirement is not a reliable source of delivery. As a SME, the ability to secure the planning permission of and deliver schemes on small sites is crucial to the success and sustainability of our business. Due to their scale and low infrastructure costs, such sites can be delivered quickly to assist the Council's housing land supply position and can deliver tangible benefits to local communities, such as enhancing and maintaining the vitality of local services and facilities in accordance with Paragraph 78 of the NPPF.</p> <p>It is our recommendation that more small and medium sized sites should be allocated for development within the emerging Local Plan in order to provide a more reliable source of housing delivery.</p> <p>Finally, the proposed plan period spans 17 years from 2022 - 2039. Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption. On the basis of a plan end of 2038/39, the Plan will need to be adopted by 2023/24. As the Council expect the Plan to be submitted for examination in Autumn 2023, based on a 12 month examination which is typical, the Plan would not provide a 15-year minimum strategy for West Berkshire. In this respect, we suggest that the Plan period is extended by a further year.</p> <p>In summarising our comments on Policy SP12, we consider the policy to be contrary to Paragraphs 11, 16, 61 and 69 of the NPPF. For these reasons, the policy is unsound.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Southgate, David
Consultee Full Name	David Southgate
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1080
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 22:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	No

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Specific Objection: WBC's timings on the Local Plan Review Consultation</p> <p>On 6th December, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement setting out forthcoming amendments to the National Planning Policy Framework (NPPF). The Statement set out the following (inter alia): <i>I will retain a method for calculating local housing need figures, but consult on changes. I do believe that the plan-making process for housing has to start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory. It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character of an area, or heritage assets. It will also be up to them to increase the proportion of affordable housing if they wish.</i> <i>My changes will instruct the Planning Inspectorate that they should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns. Overall this amounts to a rebalancing of the relationship between local councils and the Planning Inspectorate, and will give local communities a greater say in what is built in their neighbourhood.</i></p> <p>The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March, 2023. The Consultation Version of the NPPF sets out that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan) will be advisory not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking into account the character of an area when assessing how much housing can be accommodated.</p> <p>Government Consultation for NPPF currently underway</p> <ul style="list-style-type: none"> • Likely to reduce overall housing requirement for councils. • Will take into account historic oversupply – evidence that WBC has overdelivered on housing in recent years. • Unlikely to need to take into account unmet need from Reading Borough Council (230 dwellings) • Likely that development of North East Thatcham would not be required. <p>On the back of this announcement, several Local Authorities have paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned for. On this basis, it is unclear why West Berkshire are continuing to consult on the current version of the local plan and also why councillors did not require the final version of the plan to be brought back to them for approval (i.e. at the 2nd December vote at the full council meeting) before it is</p>

	submitted to the Planning Inspectorate for examination. I feel that the council should take the opportunity, as others have, to pause the plan making and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Feltham Properties (Represented by Pro Vision)
Consultee Full Name	Sean Bates
Consultee Organisation	Feltham Properties
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS749
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:07:43
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes	

* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>A priority of Local Plan Review, set out in the Vision (paragraph 3.2) is to improve the affordability of housing in the district. We have concerns however that the proposed strategy if unlikely to be effective in achieving this priority with the housing requirement proposed.</p> <p>The proposed supply of housing relies significantly on existing permissions without any allowance/buffer for non-delivery.</p> <p>There is a significant reliance on windfall development. Recent rates of windfalls are dropping well below the anticipated 140 windfalls per annum assumed over the plan period.</p> <p>The buffer of up to 5% on the Local Housing Requirement is too low, noting precedents in other local authorities including South Oxfordshire (27%). The Council's justification for reducing the buffer from 10% is due to the level of constraint in the district. It is because of this constraint that a greater buffer is needed, to ensure that as much of the housing requirement is delivered in the plan period to address strategic objectives such as the priority of affordable housing.</p> <p>It is likely that there will be a greater level of unmet need arising from neighbouring authorities, notably Reading Borough, which as a major urban centre, is subject to the uplift on the standard method.</p> <p>Delivery rates for the strategic development site at Sandleford Park are overly ambitious, noting that the site only has outline permission as at March 2023. First completions in 2027/2028 is very ambitious.</p> <p>The vast majority of the additional homes needed to meet the housing requirement (1,809) are expected to come from one site allocation (1,500 dwellings at North East Thatcham). There appear to be significant question marks over the delivery of North East Thatcham, including in terms of its actual capacity (at Regulation 19 stage it was 2,500 homes) and its viability to deliver the infrastructure, including a new secondary school. Therefore, notwithstanding concerns of the scale of new homes needed, over 80% of the LPR strategy for additional homes is tied up in one site.</p> <p>If the intention is for North East Thatcham to grow to 2,500 homes, stretching beyond this plan period, a strategic vision is need (in accordance with NPPF 22). There is a strategic vision in the evidence base,</p>

	<p>looking ahead to 2050, but this has not been mentioned in the Local Plan Review, nor has it been subject to full Regulation 18 consultation. Its status and relevance is unclear.</p> <p>The Council has overlooked development opportunities within existing settlement boundaries. For example, Feltham Properties is seeking to deliver a mixed-use development, including housing, food store and care accommodation, with a public EV charging station, on underutilised, previously developed land at Newbury College, Monks Lane. A hybrid application was made in 2021, and while that is now subject to a S78 appeal under non-determination, the principle of development is confirmed as it is (almost entirely) within the settlement boundary. However, the Council's evidence base (the Housing and Economic Land Availability Assessment) has not considered this 'within settlement' land, while the development strategy is allocating greenfield sites beyond settlement boundaries.</p> <p>It is inevitable that greenfield sites and sites beyond existing settlement boundaries will be required as part of the strategy to meet development needs over the plan period, but this example indicates that there is likely to be greater yield from within the existing boundaries. Such sites, especially those in the top tier settlements should be prioritised, given their accessible locations, and brought forward through site allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We consider that there are potentially significant weaknesses with the development strategy that would require a significant rethink in strategy rather than minor modifications.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To elaborate our concerns about the current approach to housing delivery.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>May, Amanda & ED</p>
<p>Consultee Full Name</p>	<p>Amanda & ED May</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1026</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 12</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Approach to Housing Delivery</p>
<p>Order</p>	<p>39</p>

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 22:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>*LATE RESPONSE*</p> <p>We wish to express our support for the CPRE assessment regarding the ability to deliver more of the required housing on brownfield sites.</p> <p>In particular the reservation of the land adjacent the A34/339 south of junction 13 to mineral purposes fails to recognise that once minerals have been extracted the land is free for other uses and this area is already blighted by the roads so is suitable for commercial development adjacent the roads and housing on the perimeter.</p> <p>There is also a lack of emphasis on the better use of height in increasing density, the Victorian approach, as implemented in Cadugan Place in Reading, has much to recommend it in terms of visual aspect, thermal efficiency, potential for natural ventilation in the summer and reduced footprint.</p>

	I hope you will accept these observations despite their being a few hours late, principally due to the unreliability of the post in our area we only received the CPRE analysis today and did not arrive home until 20:00 to read it.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1317
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes	

* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Object. The policy is not justified or effective. (in relation to Gorse Covert)</p> <p>The policy directs development to be located in accordance with Policies SP1 Spatial Strategy, SP3 Settlement hierarchy and DM1 Development in the Countryside. This is justified, effective and consistent with national policy. However, Table 2 in the reasoned justification includes the Sandelford Park site, setting out net units outstanding as 1580 homes. There is scope to increase the Sandelford Park site by up to circa 200 units with the inclusion of Land to the South of Gorse Covert.</p> <p>Consequently, reasonable alternatives have not been properly considered: a site in a location recognised to be the most sustainable in the District has been dismissed from inclusion in the plan. See representations to Policies SP13 and SP16 for further site information details of Land South of Gorse Covert.</p> <p>Windfalls are proposed to make up 20% of the housing requirement. It is considered that the level of dependency on windfalls could result in insufficient development coming forward within the plan period. This could be particularly pronounced in the latter half of the plan period due to reliance on the North East Thatcham Strategic Allocation and windfalls. It would also potentially risk shortfalls in the Council's five year housing land supply, resulting in permissions being sought on less sustainable sites. The five-year land supply on adoption in 2024/25 is estimated to be marginal at around 5.38 years.</p> <p>It would be preferable to allocate additional sites to provide supply certainty. Land South of Gorse Copse is an available site in a sustainable location for development, being in Newbury and adjacent to an allocated site. There are no site constraints which prevent it from being developed. It should be included in the Plan as a housing site. Further site details can be found in representations to Policies SP13 and SP16.</p> <p>Additionally, there is a need for clarity on the Council's housing requirement figures. The Council has set a minimum annual figure of 513 homes and a target of 538. This is likely to lead to confusion and</p>

	<p>resultant decision making delays. It would be preferable if the plan was amended to incorporate an additional buffer, with the 538 figure adopted as the minimum.</p> <p>Support. (in relation to Sandlesford Park)</p> <p>The policy directs development to be located in accordance with Policies SP1 Spatial Strategy, SP3 Settlement hierarchy and DM1 Development in the Countryside. Table 2 in the reasoned justification includes the Sandlesford Park site, setting out net units outstanding as 1580 homes.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Proposed amendment 1.</p> <p>Approach to Housing Delivery</p> <p>Provision will be made for 9,146 net additional homes in West Berkshire for the period 1 April 20202 to 31 March, 538 dwellings per annum. The target 538 dwellings per annum does not constitute a ceiling or cap to development.</p> <p>Proposed amendment 2.</p> <p>Table 2 to be amended to reflect the allocation of circa 200 homes on Land South of Gorse Copse, adjacent to Sandlesford Park or the increase in the Sandlesford Park site to include the circa 200 homes that can be delivered on Land South of Gorse Copse.</p> <p>Table 2</p> <p>Supply Category Site/Net Units</p> <p>Land South of Gorse Copse/200</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Yes, to explore whether the draft policy will deliver the housing requirement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>TA Fisher & Sons Ltd (Represented by Pro Vision)</p>
<p>Consultee Full Name</p>	<p>TA Fisher & Sons Ltd</p>
<p>Consultee Organisation</p>	<p>TA Fisher & Sons Ltd</p>
<p>Agent Full Name</p>	<p>Miss Katherine Miles</p>
<p>Agent Organisation</p>	<p>Pro Vision Planning & Design</p>
<p>Comment ID</p>	<p>PS1211</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 12</p>

Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Our client has an agreement with the landowners of the site, known as 'Land to the rear of The Hollies' in the District, which currently forms part of an allocated site for approximately 60 dwellings under Policy HSA16 in the adopted Housing Site Allocations Development Plan Document (HSADPD) (May 2017).

It is understood the 'emerging draft' Local Plan Review (LPR) no longer seeks to carry this allocation forward. This is despite part of the allocated site having already been built out and now occupied by residents. The Council say this is because the site now falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. The DEPZ was extended as a result of the updated Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019.

Our client does not support the removal of this allocated site from the Development Plan. Our client is keen to work collaboratively with the Council to secure the development of the remaining part of this currently allocated site. These representations therefore focus on responding to the removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield.

These representations also seek to respond to the Council's development strategy (including Policies SP1 and SP3, SP12 and SP14) and decision-making in relation to an effective 'moratorium' on new development within Burghfield Common, despite the village remaining as a 'Rural Service Settlement', which offers 'development potential appropriate to the character and function of the settlement', according to the proposed Spatial Strategy.

These representations also discuss Policy RSA12, which seeks the provision of approximately 100 dwellings within Burghfield Common1, within the extended DEPZ.

In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021) paragraph 35. This identifies that a sound Plan is:

- a) **Positively Prepared** – 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development';
- b) **Justified** – 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence';
- c) **Effective** – 'deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground'; and
- d) **Consistent with National Policy** – 'enabling the delivery of sustainable development in accordance with the policies in this Framework'.

It is in light of these criteria that the LPR (Regulation 19) version has been considered. We find the de-allocation of site HSA16 is not consistent with the Council's approach to its development strategy and the settlement hierarchy. In addition, its approach towards a 'moratorium' on further development within the parish of Burghfield Common is flawed.

Policy SP12 seeks the provision of 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039, where new homes will be located in accordance with Policy SD1: Spatial Strategy, Policy SP3: Settlement Hierarchy and Policy DM1: Development in the Countryside.

Again, this appears to conflict with the approach taken towards development under Policy SD4 where sites fall within the extended DEPZ. The remaining allocation of 32 dwellings would, however,

contribute to the District’s housing supply in a modest, but important way.

Table 2 sets out the Housing Supply as at March 2022 and confirms there are 990 net units outstanding on HSADPD Sites. The remaining 32 dwellings on the site should be included within this figure.

Conclusion

These representations have been prepared by Pro Vision on behalf of our client, T A Fisher & Sons, in response to West Berkshire Council’s consultation on its Local Plan Review 2022-2039 (Regulation 19) (January 2023).

Our client has an agreement with the landowners of the site known as ‘Land to the rear of The Hollies’ in the District, which currently forms part of allocated site ‘HSA16’, in the adopted HSADPD (May 2017).

We note the allocation for the site is no longer included within the ‘emerging draft’ LPR, as the site falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield, despite there being a remainder of 32 units still to be delivered.

Our client **does not** support the removal of this allocated site from the LPR.

These representations have therefore focused on responding to the unjustified removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield as well as the development strategy and spatial hierarchy proposed by the LPR.

In particular, we consider the remaining number of dwellings should be carried forwards in the LPR as the development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To ensure that the views of our client in respect of the removal of the allocated site known as ‘Land to the rear of The Hollies, Burghfield Common’ and the inconsistencies in the spatial strategy, particularly towards development within the DEPZ, are heard</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1366
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:09:00
Attached Files	Pro Vision (T A Fisher) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Policy SP12 of the draft Local Plan makes provision for 8,721 to 9,146 net additional homes for the period 1 April 2022 to 31 March 2039. This equates to 513-538 dwellings per annum (dpa), although the policy confirms that <i>“The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development.”</i></p> <p>The supporting text (paragraph 6.2) sets out that the Local Housing Need (LHN) for the District is 513 dwellings per annum (dpa). Supporting text (paragraph 6.10) sets out that in order to support the government’s objective of significantly boosting the supply of homes the upper end of the range (538) allows for approximately 5% buffer additional homes on top of the 2022 LHN. Supporting text (paragraph 6.23) sets out that the 5% buffer and the <i>“relatively modest windfall allowance”</i> add flexibility to ensure housing targets can be met.</p> <p>The aim to boost supply complies with paragraph 59 of the NPPF. Furthermore, built-in flexibility ensures that the Local Plan is sufficiently flexible to adapt to rapid change (paragraph 11(a) of the NPPF). However, to ensure that decisions regarding new development can remain Plan-led (paragraph 15) and land is brought forward at a sufficient rate (paragraph 23), it is necessary to ensure that there is enough flexibility in the Plan.</p> <p>We note that there is already a shortfall of 310 dwellings against the Core Strategy requirement, and delivery has fallen below the Core Strategy housing requirement in over half of the years during the Plan period to date (AMR, Table 3.4). Clearly this is significant, and should be factored in in establishing the housing requirement.</p> <p>The Regulation 18 version of the draft Local Plan included a 10% buffer. The Housing background paper6 paragraph 2.33 states that <i>“ The decision to reduce the buffer from 10% to 5% is considered to provide a balance between boosting housing supply in the district while considering the limitations and constraints of a largely rural district”</i>. The HELAA demonstrates that there are plenty of available sites that respect the limitations and constraints of a <i>“largely rural district”</i> for example our clients land at West End Road, Mortimer HELAA Ref: SM2 and therefore a 5% buffer is not necessary and there should be a higher buffer of at least 10% as set out in the Regulation 18 version of the draft Local Plan to add sufficient flexibility to ensure housing targets can be met and to boost supply to comply with paragraph 60 of the NPPF. Such a contingency is particularly important as the Council is relying upon two complex, large sites (Sandleford Park and North East Thatcham) to deliver a large proportion of the District’s housing need.</p> <p>A 10% buffer would result in an upper range of 564 dpa which would result in the need for another 442 dwellings across the Plan period.</p> <p>Appendix 4 of the Council’s Sustainability Appraisal (SA) Report (November 2022) provides a SA of each of the policy options considered in the draft Local Plan. In relation to the approach to housing delivery, the following options were assessed:</p> <ul style="list-style-type: none"> • Option 1: Baseline LHN. • Option 2a: Boosting supply option a (LHN + 10%). • Option 2b: Boosting supply option b (LHN + 5%) 2.51 The SA assesses each option against the same ten sustainability objectives. It is concluded that Options 1 and 2b would result in overall positive effects, while Option 2a would result in overall positive effects, with some significantly positive effects. This provides further support for a higher buffer. <p>The PPG7 sets out that <i>“the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area”</i> and that <i>“there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (our emphasis).”</i></p> <p>The Council’s Updated Housing Needs Assessment8 confirms that there is a pressing need for affordable housing in the District. It sets out a requirement of 330 dpa rented affordable homes and 367 dpa affordable home ownership homes. This equates to 136% of the standard method local housing need figure. The Housing Needs Assessment sets out that <i>“it is inappropriate to use a mechanical relationship to consider how affordable housing provision and overall housing need relate to one another. The affordable housing need is a point-in-time assessment based on current housing costs relative to earnings and takes account of current supply. The reality is that many households with an affordable housing need, including those who aspire to own a home, are existing households living in the private rented sector.”</i> This in part is agreed, however there should be more flexibility built into the LHN to ensure that</p>

affordable housing need is met, especially given the high reliance on small windfall sites (10 or less dwellings) to deliver a large proportion of the District's housing need (small sites do not bring forward as much affordable housing).

In line with paragraphs 24-27 of the NPPF, the Council has a duty to co-operate with other Local Planning Authorities (along with other prescribed bodies), on strategic matters that cross administrative boundaries.

The duty to co-operate has the potential to significantly influence the Local Plan Review, particularly the number of homes that the Council is required to accommodate. If neighbouring authorities are unable to meet their needs in full, they should ask West Berkshire to assist them, which could increase the District's housing requirement.

Paragraph 6.5 of the draft Local Plan states that "*Reading Borough Council has identified a shortfall of 230 dwellings that is anticipated to arise in the latter part of their current Local Plan period. The Reading Local Plan considers the period through to 2036.*" Paragraph 6.8 sets out that "*Reading has identified that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the Western Berkshire HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises.*"

The standard methods applies a 35% uplift to the 20 largest cities and urban centres in England, which includes Reading and therefore their five yearly review required by 2024 that will need to consider how to deal with the housing needs generated by the standard methodology is likely to result in a significant increase in their housing requirement.

It is likely that the evidence of the unmet need will emerge before/at a similar time that the LPR is adopted. If this evidence is not forthcoming then more flexibility is required in the Plan (i.e more housing site allocations).

Accordingly, the Council's housing target fails to meet the test for soundness in the NPPF (2021) as the LPR is not positively prepared, justified, effective or consistent with national policy.

Housing Delivery

Windfall allowance

There is a high reliance on small windfall sites (10 or less dwellings) to deliver a large proportion of the District's housing need. Table 2 in the draft Local Plan shows a windfall allowance of 1,949 with a total supply requirement of 9,146; the windfall allowance therefore represents 21% of the total supply. There should not be such a high reliance on small windfall allowance as it is not proactive planning, and will deliver less affordable housing than larger allocated sites.

Table 3.1 in the Housing Background Paper9 provides net windfall completions from 2006-2022 with an annual average of 140.9 dwellings for small sites (less than 10 dwellings); this Figure has been used for the windfall allowance in the draft Local Plan. However Table 3.1 shows that the annual windfall has significantly dropped in the last three monitoring years (109, 87 and 95) and therefore 140.9 dwellings may be an overestimate.

Existing planning commitments on unallocated sites

There is also a high reliance on existing planning commitments on unallocated sites to deliver a large proportion of the District's housing need. Table 2 in the draft Local Plan shows 1,958 existing planning commitments with a total supply requirement of 9,146 therefore representing 21% of the supply.

A 10% Non - Implementation Rate should be applied to the existing planning commitments to provide a more robust position. This would mean that another 196 homes would need to be found to meet the total supply.

North East Thatcham

The housing delivery approach is over reliant on North East Thatcham. Paragraph 6.23 of the draft Local Plan sets out that out of the 1,809 new dwellings that need to be found (requirement of 9,146 minus supply of 7,337) 1,500 are allocated at North East Thatcham Furthermore the housing trajectory in the Housing Background (footnote 10) paper seems unrealistic as it estimates that 1,500 homes would be built out during the plan period based on 150 dpa build out rate starting from 2029/30. Lichfields evidence (footnote 11) on average build out rates is 100- 120 dpa for sites of 1,500 homes. Taking the higher 120 dpa means that 1200 would be built out during the Plan; this is similar to the 1,250 which were expected to be built out during the Plan period at The Regulation 18 stage of the draft Local Plan.

Sandleford

The housing trajectory in the Housing Background paper seems unrealistic as it estimates 100 dpa from 2025/26; outline permission was granted for Sandleford East in 2022 and no reserved matters application has been made yet. Therefore the estimated 1,500 homes during the plan period seems unrealistic; indeed only 1000 homes were estimated to be built out during the Plan period at The Regulation 18 stage of the draft Local Plan.

Attachment:

- Full rep (inc. footnote)

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gleeson Strategic Land Ltd
Consultee Full Name	Mr Peter Rawlinson
Consultee Organisation	Gleeson Strategic Land Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1122
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Council's use of a range between two potential housing targets of between 8,721 and 9,146 dwellings, or between 513 to 538 dwellings per annum is not specific or clear. The National Planning Policy Framework (NPPF) at Paragraph 16 (d) states that Plans should 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. A housing delivery range is not clear or unambiguous. A range could result in time wasted in future planning determinations or appeals, debating which end of the range should be used when calculating the Council's five year housing land supply and in calculating past the housing delivery against the target. NPPF Paragraph 66 sets out that 'Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.' The NPPF does not refer to identifying a range for a housing target it requires a specific figure. Furthermore, NPPF Paragraph 60 refers to the Government's objective of significantly boosting the supply of homes. Given this overarching aim it is considered that the housing target should be set at the upper figure of 9,146 dwellings or 538 dwellings per annum.</p> <p>The Local Plan also at paragraph 6.6 recognises that Reading Borough Council has an identified shortfall of 230 dwellings. Whilst the Plan confirms that this need should be met within West Berkshire it stops short of actually agreeing the distribution of this unmet need, and states this will be subject to further review. If the unmet need has been identified, and that it will be accommodated within West Berkshire has been established, there is no reason to delay meeting this need and it should be included in the Council's housing requirement now and not put off for a further review. Sites should also be allocated now to meet this identified need.</p> <p>To summarise the above points, Gleeson Land supports the overall intentions of the Local Plan Review to deliver sustainable development for the district, the settlement hierarchy and the spatial strategy. However, it is considered that there should be a requirement for an earlier review of the Local Plan should any changes arise in the AWE Burghfield and AWE Aldermaston DEPZ's or the capabilities of the Emergency Planning Services that may change the acceptability of new residential development in areas currently covered by the DEPZ. In addition the housing target should be more clearly defined at the upper end of the given range. It should be clear throughout the whole Plan that the housing target is for 9,146 dwellings (538dpa), plus the 230 dwellings of unmet need from Reading Borough Council. This unmet need should be provided for in new site allocations now, rather than being left for a later review. Serious consideration should also be given to increasing the overall housing target further to support the delivery of more affordable homes given the very high need for such homes</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Royal Borough of Windsor & Maidenhead
Consultee Full Name	Royal Borough Windsor & Maidenhead
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1536
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? -	

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The Royal Borough notes that West Berkshire can currently demonstrate a 6.4 years' housing supply and welcomes the intention of West Berkshire to accommodate its housing need in full. We acknowledge that this is expressed as a range, with the upper end of the range allowing for approximately 5% additional homes on top of the 2022 Local Housing Need. We support the inclusion of a buffer to allow for delays and non-implementation that may occur during the plan period.</p> <p>In conclusion, the Royal Borough of Windsor and Maidenhead has no concerns or objections to the Regulation 19 version of the Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gladman Developments Ltd
Consultee Full Name	Mr Josh Plant
Consultee Organisation	Gladman Developments Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS729
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 14:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><u>Housing Delivery</u></p> <p>Policy SP12 seeks to provide a housing requirement for West Berkshire as a range of between 8,721 and 9,146 dwellings over the plan period 2022-2039, equivalent to 513 to 538 dwellings per annum (dpa). The figure of 513dpa has been calculated using the standard methodology and represents the Local Housing Need (LHN). The policy states that the target figure of 538dpa has been calculated by applying a 5% buffer to the LHN and expresses the housing requirement as a range. It is not clear from the policy or the supporting text whether the lower end or the higher end of the requirement would be used for the purposes of future five-year housing land supply calculations. The use of a range is inherently unclear and ambiguous and is in direct conflict with the NPPF (footnote: NPPF (2021) Paragraph 16)).</p> <p>This matter was considered at the Fylde Local Plan Examination in Public by Inspector Wright in 2018. As part of their Local Plan Review the Council wanted to replace the housing requirement figure with a range (the lower figure being derived from the standard methodology). The Inspector clearly rejected this approach between paragraph 32 and 34, which stated:</p> <ol style="list-style-type: none"> <i>Policy H1 in the FLP32 sets the minimum annual housing requirement as 415 dwellings. Policy DLF1 sets the overall requirement as 8,715 new homes over the 21 year plan period. The Plan revises both policies to include the lower housing requirement figure of 275 dpa and 6,895 dwellings overall, as assessed through the standard method. However, it also keeps the existing figures and identifies the housing requirement as a range. As proposed, Policy H1 therefore identifies 275-415 dpa as the housing requirement for the period 2019-2032, with the earlier years 2011-2019 remaining at 415 dpa. Policy DLF1 provides for a minimum of 6,895-8,715 new homes over the whole plan period.</i> <i>Identifying the housing requirement as a range lacks clarity, is not effective and implies there is a maximum figure. Whilst I note that the Plan does not specifically state that the top of the range is a ceiling, it can be implied, and it is critical that the housing requirement is set out unambiguously. Accordingly, it is necessary for the housing requirement to be identified as a single minimum figure within the Plan for the period 2019/20 to 2031/32 and as a single figure for the total plan period requirement.</i> <i>Therefore, in order to meet the housing needs identified in paragraph 30 above, it is necessary to modify Policy DLF1 so that the minimum total housing requirement for the plan period is 7,275 dwellings. Similarly, Policy H1 requires modifying so that the minimum annual housing requirement is 305 dwellings for the period 2019- 2032.... (emphasis added)</i> <p>The ongoing Central Lincolnshire Local Plan Review examination has also grappled with housing requirement ranges. In response to the Inspectors' Matters, Issues and Questions the Central Lincolnshire Joint Strategic Planning Committee agreed that expressing the housing requirement as a range could lead to confusion and a main modification was needed for the effectiveness of this element of the Plan (footnote: Central Lincolnshire Local Plan Review: Inspectors' Port Hearing Letter (EX034) https://www.nkesteven.gov.uk/_resources/assets/attachment/full/0/140406.pdf).</p> <p>Similarly, the issue was considered during the examination of the Darlington Local Plan 2016-2036, whereby Policy H1 set a minimum housing requirement of 422 dwellings per annum (dpa) and also an annual target of 492 dpa over the plan Period. The Inspector concluded that the 492 dpa figure was justified and positively prepared being consistent with the economic aspirations of the Plan. However, it was noted that the lower 422 dpa figure should be deleted as it served no purposes and creates ambiguity, including how the five-year housing requirement will be calculated in line with national policy (footnote: Darlington Local Plan 2016 – 2036: Inspector's Report https://microsites.darlington.gov.uk/media/2277/inspectors-reportdblp.pdf).</p> <p>In addition, Gladman have serious concerns that progressing the proposed housing requirement in its current form will further exacerbate the significant shortage of affordable homes within West Berkshire.</p> <p>As part of its plan preparation, the Council commissioned Icen Projects and Justin Gardiner Consulting to update elements of the housing needs evidence which was originally produced in May 2020. Responding to the wider definition of affordable housing as set out in the Framework, the report includes an updated assessment of the affordable housing need in West Berkshire. The report identifies that there is a 'high' overall need of 697 affordable homes per annum in order to fully address the affordable housing needs of West Berkshire.</p>

	<p>The PPG sets out that an increase in the total housing figures included in a plan may need to be considered where it could help deliver the required number of affordable homes (footnote: PPG ID: 2a-024-20190220). The Housing Needs Assessment Update outlines that the affordable need represents 136% of the Local Housing Need calculated using the standard methodology. It states that if the Council were to provide for the affordable housing need in full, taking into consideration the affordable housing policy of 40%, then the overall housing requirement would be equal to around 1,740dpa.</p> <p>Gladman agree in part with Iceni's conclusion in that providing for the full affordable need would be unrealistic in terms of how many market homes would need to be delivered. That being said though, given the chronic shortage of affordable homes available in West Berkshire, and the real-world implications for not delivering a sufficient number of affordable homes, we believe there would be significant social and economic benefits from an increased overall housing requirement. This in turn would deliver greater levels of affordable homes and help to address the well documented shortfall within West Berkshire. The East Riding of Yorkshire's Proposed Submission plan includes an uplift of almost 20% from the baseline local housing need figure in order to support the delivery of affordable housing, resulting in a housing requirement of 1,100dpa. Gladman urge West Berkshire Council to consider the application of a similar uplift in order to ensure a greater quantum of affordable housing is delivered.</p> <p>Finally, the supporting text for SP12 outlines a number of sources which will be used in order to deliver the housing requirement through to 2039, these include, but are not limited to retained allocations, existing planning commitments, windfall sites and new sites allocated in the Local Plan Review.</p> <p>Gladman notes that 80% (or 7,337 dwellings) of the growth expected to come forward over the plan period to 2039 is from completions since the start of the plan period, permitted sites, windfall and existing allocations carried forward from the Core Strategy and the Housing Sites Allocations DPD (adopted in 2012 and 2017 respectively). While a further 1,809 dwellings need to be identified for the deliverable supply to meet the housing requirement of 9,146 (upper end of range).</p> <p>Gladman acknowledges that a proportion of these sites already benefit from planning permission however raise some concern over the deliverability of the sites. Gladman has specific concerns that the levels of housing proposed will not be delivered on these existing allocations, many of which have been allocated for six years and have not yet come forward. Gladman questions whether any further analysis or evidence has been provided to understand why these sites have not delivered and to demonstrate clearly that these sites will realistically be delivered within the plan period to 2039.</p> <p>The Council acknowledge that there needs to be further flexibility built into the housing supply to allow for phasing issues and an element on non-delivery. The ongoing Levelling-up and Regeneration Bill: reforms to national planning policy consultation also notes that their analysis suggests 15% of planning permissions are not progressed or are revised.</p> <p>In this regard, Gladman consider that an additional supply flexibility of 15% above the housing requirement should be identified to safeguard against the non-implementation and delivery of housing proposals and to ensure the Plan is effective and positively prepared in line with paragraph 35 of the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Commercial Estates Group (Represented by Woolf Bond Planning)
Consultee Full Name	Commercial Estates Group
Consultee Organisation	Commercial estates Group
Agent Full Name	Mr Steve Brown
Agent Organisation	Woolf Bond Planning
Comment ID	PS1288
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:25:00
Attached Files	Woolf Bond Planning (CEG) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	Yes

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Is it not considered that the plan as draft is sound under these matters as:</p> <ol style="list-style-type: none"> 1 It is not positively prepared as it does not seek to contribute sufficiently to the Government's wider objective of significantly boosting the supply of housing; 2 It is not justified with regard to the timeframe that the examination of the Local Plan will take resulting in a delayed adoption of the document; 3 It is also inconsistent with national policy in the failure to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraphs 60 and 61 of the NPPF. <p>CEG has a strong belief in the principle of the plan-led system. In setting out our representations upon the Regulation 19 Draft Submission West Berkshire Local Plan, we hope to be able to work with the Council in order to ensure the final Local Plan is fit for purpose in seeking to facilitate sustainable development that can deliver the much-needed new homes whilst also securing the provision of supporting infrastructure to ensure the creation of places where people will want to live and work in locations that are truly sustainable.</p> <p>CEG has considerable experience and expertise in dealing with and realising development schemes through the planning system.</p> <p>In this context, we welcome the publication of the Regulation 19 draft Local Plan. However, and as our representations explain, the Local Plan should provide a strategy consistent with national policy to deliver the growth across the Plan area that addresses both District's needs as well as unmet needs from neighbouring authorities.</p> <p>CEG has a controlling interest in circa 40ha of land to the north of Newbury, identified as part deliverable in the Council's Housing and Economic Land Availability ("HELAA") Study under Site Ref: SCD4.</p> <p>Deliverable Opportunity for Housing Growth on land to the north of Newbury, on either side of the A339 (HELAA Site Ref: SCD4)</p> <p>Since the Draft Submission Document fails to include our client's site as a housing allocation, we highlight the failures of the Council's assessment and the reasons why it should have been included.</p> <p>Our representations highlight the suitability, availability and achievability of the land HELAA Site Ref: SCD4.</p> <p>The locational context for the site is formed by the extant planning permission for 401 dwellings, local centre and primary school that was allowed at appeal in March 2017 (LPA Ref: 14/02480/OUTMAJ).</p> <p>Subsequent reserved matters permission has been granted and work has commenced to implement the development. The residual land to which these representations relate represents a sustainable location in seeking to meet housing needs within West Berkshire, at the principal settlement of Newbury.</p> <p>Policy SP12: The Approach to Housing Delivery</p> <p><i>The Plan Period</i></p> <p>Policy SP12 covers the period April 2022 to March 2039.</p> <p>The Council's Local Development Scheme (January 2023) outlines the timetable for the remaining stages in the preparation of the Local Plan. It envisages submission of the draft Plan for examination by the Secretary of State in March 2023, with the examination starting in July 2023 and adoption by September 2024. Such a timeframe for the preparation of the document, especially post consultation on the draft submission plan is not considered realistic.</p> <p>This is especially noticeable as submission to the Secretary of State is expected within under a month after the consultation period ends on 3rd March 2023. There is seemingly little if any prospect of the Local Plan being submitted, examined and adopted by September 2024.</p> <p>Although it is noted that the Government is contemplating refinements to plan making procedures through the Levelling Up and Regeneration Bill and updates to the NPPF (footnote 2), a review of the time taken for the examination of Strategic Local Plans submitted since 24th January 2019 (as referenced in paragraph 220 of the current NPPF) indicates (footnote 3) that for the 32 plans found sound, the examination period was 526 days (or over 17 months). The same analysis also indicates that the period from commencement of the consultation on a draft submission plan through to receipt of the Inspector's Report was on average 742 days (or over 2 years).</p> <p>Furthermore, applying the national averages for preparing the Local Plan indicates that allowing the minimum 2 years from commencement of consultation on the draft submission Plan indicates that the Inspector's Report could be received in January 2025 with adoption thereafter.</p> <p>As the NPPF (paragraph 22) is clear that strategic policies (including those for housing) should look forward at least 15 year post adoption, the current Plan period to March 2039 does not achieve this.</p>

In the circumstances, **the Plan should cover the period to at least March 2040. This would add a further years' housing requirement.**

The Housing Requirement

Although the District's housing requirement in Policy SP12 is derived from the Local Housing Need (consistent with NPPF paragraph 61), no allowance has been made for an uplift to address the acknowledged shortfall arising in the neighbouring authority of Reading Borough.

Policy H1 of the adopted Reading Borough Local Plan identifies a shortfall of 230 dwellings in the plan period that cannot be met in the Borough.

Neighbouring authorities, especially those within the Western Berkshire Housing Market Area like West Berkshire Council consistent with NPPF paragraph 61 should contribute towards addressing this shortfall. This shortfall is referenced in paragraph 6.5 of the Draft Submission Local Plan.

Whilst the Draft Submission Plan is clear it should only consider unmet need as outlined in the adopted Reading Borough Local Plan (paragraph 6.6), as Reading is one of the 20 largest urban areas in England, once Reading Borough commences a review of its local plan it will be required to deliver a 35% uplift on the minimum Local Housing Need (footnote4).

Consistent with the obligations at paragraph 73 of the NPPF, Reading Borough will need to undertake a review of its current housing requirement to establish the feasibility of achieving the requirements as derived through LHN. This will therefore include an assessment of LHN including all the relevant adjustments.

Whilst it is noted that Reading Borough's shortfall is currently, set at 230 dwellings over the plan period, paragraph 61 of the NPPF does not discount future unmet needs which are expected to arise in neighbouring areas. This is because paragraph 61 is clear that "any needs that cannot be met within neighbouring areas should also be taken into account". As the preceding sentence of the paragraph references current and future demographic trends, this logically also applies to the consideration of needs in neighbouring areas i.e. both current and future.

Although the Draft Submission Local Plan discounts the potential application of LHN in Reading Borough, it does not consider the development needs that have and will continue to arise in both West Berkshire and Reading, as confirmed in the results of the 2021 Census.

Tables 1 and 2 below provide comparisons of the population and household projections alongside the results of the Census.

The comparison indicates that the population growth for both authorities within the 2021 Census were significantly above each of the forecasts, and for households, this also applies for Reading Borough.

The actual household growth in 2021 is marginally below that projected in the 2014 projections whereas it is higher than both the 2016 and 2018 projections.

<table 1 and 2 in attachment>

Alongside the comparisons of the projections with the Census results, the implications for the expectations on average household size (based upon population / households) is shown in Table 3.

Table 3 confirms for both West Berkshire and especially for Reading, the average household size has not reduced to the extent envisaged. In fact, Reading Borough has seen a significant increase in household size. Whilst this might be a result of slowing in societal changes and the expected growth in especially single person households, it could also be a result of constrained housing delivery both nationally and locally which has impacted upon household creation with associated impacts upon over-crowding and wider social needs. This is one of the matters that indicate why the approach of determining LHN results in a minimum requirement.

There are clear signs within West Berkshire and Reading that there are constraints for housing delivery which are affecting the wider society as illustrated by the household size not reducing to the extent envisaged.

This will therefore raise doubts over the realism that the expected future reductions will occur and therefore a boost to the housing requirements is therefore necessary. This is therefore a reason for delivering additional homes across the plan area above the minimum set through LHN.

<table 3 in attachment (footnote 5)>

Table 3 indicates that for West Berkshire, the changes in household size implied by the analysis of the 2016-based sub-national and population projections is the best fit with the outcome of the Census.

Table 4 confirms the accuracy of the 2016 based household and population projections with the 2021 Census, in contrast to both the 2014 and 2018 based projections.

<table 4 in attachment>

As the 2016 based projections are closer to the results of the Census for West Berkshire, the Council should also consider whether a refined LHN assessment which includes these as the input, rather than the 2014 based figures would be appropriate.

Whilst Table 4 indicates that the average household growth in the 2016 based projections from 2021 to 2031 was 480pa, the equivalent for the 2022 to 2032 period is shown in Table 5 below. Table 5 also includes a comparison with the 2014 based projections to reflect the approach of the PPG (within Step 1).

<table 5 in attachment>

Applying the same affordability adjustment as with the LHN (an increase of 1.358125) (footnote 6) would result in an annual need for 563 dwellings (footnote 7) rather than 513 dwellings (footnote 8) as required by the Plan.

This adjustment would be additional to an increase for the housing requirements to ensure West Berkshire makes a contribution towards housing needs in Reading Borough.

	<p>Whilst the derivation of LHN as detailed in the PPG (footnote 9) results in a minimum figure, Government guidance is clear that there are circumstances where it is appropriate and responsible to plan for higher levels. Whilst examples of this are detailed in the PPG (footnote 10), this is not an exhaustive list.</p> <p>The above analysis illustrating the consistency of the outputs of the 2021 Census with the 2016 based population and household projections for West Berkshire is therefore an appropriate alternative for using to derive the District's housing target.</p> <p>The derivation of a housing need based upon the 2016 based projections should be reviewed alongside the outputs of the Berkshire SHMA (one of the specific examples referenced in the PPG11). The Berkshire SHMA (Feb 2016) indicated that West Berkshire's annual need was for 665 dwellings from 2013-36. This is therefore a further indication that a higher housing target should be included in the plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>As drafted, Policy SP12 fails the NPF tests of soundness for the following reasons:</p> <ol style="list-style-type: none"> 1 It is not positively prepared as it does not seek to contribute sufficiently to the Government's wider objective of significantly boosting the supply of housing; 2 It is not justified with regard to the timeframe that the examination of the Local Plan will take resulting in a delayed adoption of the document; 3 It is also inconsistent with national policy in failing to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraphs 60 and 61 of the NPPF. <p>To address these matters of soundness, several amendments are proposed. The proposed revisions to policy SP12 are:</p> <ol style="list-style-type: none"> 1 ensure that the plan period is extended to March 2040; and 2 The housing requirement is increased to a minimum of 563dpa (10,134 dwellings over the plan period) with a further uplift as a contribution towards unmet needs arising in Reading Borough.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To explain why the plan is unsound and requires the inclusion of the allocation of land north of Newbury (either side of A339) for housing.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hallam Land Management (Represented by LRM Planning)
Consultee Full Name	Ruth McKeown
Consultee Organisation	Hallam Land Management
Agent Full Name	Owen Jones

Agent Organisation	L R M Planning
Comment ID	PS1389
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:13:00
Attached Files	Mortimer Vision Document.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>[See attached Mortimer Vision Document]</i> Hallam control land at Mortimer in the east of the District that is eminently suitable for housing development, both in terms of the Plan's spatial strategy and its specific characteristics.

As drafted, the consultation document does not afford a role to Mortimer in providing additional housing over that which is allocated in the current Stratfield-Mortimer Neighbourhood Plan. Yet, that Neighbourhood Plan was prepared in the context of the 2012 West Berkshire Core Strategy and covered the period to 2026.

By simply rolling forward the current allocation to meet the new housing requirement to 2039, the growth of Mortimer is proportionately lower over the longer term.

The Neighbourhood Plan describes particular socio-economic characteristics that are prevalent locally; the affordability of housing; a shortage of certain types of housing in the parish; an ageing population and an under-representation of young persons and families.

Given that the existing allocation was to be developed by 2026 to assist in ameliorating these issues, the fact it is now proposed to be the only new housing over a much longer period will undermine its contribution. Those characteristics will endure and worsen unless a greater amount of new housing is provided in addition to the existing allocated site.

Moreover, whilst the delineation of Settlement Boundaries has been considered in the process of preparing the Local Plan Review, an objective examination of that drawn at Mortimer illustrates it is drawn tightly around the existing built-up area of the settlement. Consequently, there are no genuine opportunities for windfall development.

For these reasons, we consider the Local Plan should increase the amount of housing to be provided at Mortimer. This would be consistent with paragraph 66 of the NPPF.

In this context, our representations consider the following matters:

- Chapter 4 The Development Strategy and the role of Mortimer in the east of the District
- Chapter 6 Delivering Housing and the approach to Mortimer
- The suitability of land at Kiln Lane, Mortimer

Delivering Housing

The Local Plan should, as a minimum, provide for objectively assessed needs for housing and other uses. It should be prepared with the objective of contributing to the achievement of sustainable development. In the context of the social element of sustainable development the planning system should support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. (§8, §11b, §16 of the NPPF refer).

At the outset it is necessary to consider the **plan period** itself; referred to as 2022-2039 and extending 17 years (§22). The NPPF indicates that Local Plans should cover a minimum of 15 years from adoption. In this instance, that would require the Local Plan to be adopted in 2024 to meet the bare 15 years. Experience suggests that the remaining stages of the plan making process are unlikely to be complete within that period of time, particular, if has been suggested, this consultation has to be revisited.

Consequently, the plan period should be extended. This has the effect of increasing the amount of future development land that needs to be identified.

A Local Plan's **strategic policies** should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development. (§18 refers)

We agree that the Local Plan should consider an **amount of new housing** which reflects the Government's Standard Method (i.e., 513 dwellings per annum). We also note that Policy SP12 expresses the housing requirement as a range, with a minimum requirement of 513 dwellings per annum meeting the 2022 LHN and the upper end of the range allows for approximately 5% additional homes (rounded to 538) on top of the 2022 LHN. This is said to support the government's objective of significantly boosting the supply of homes, which is set out in the NPPF.

Over the course of the 17 years of the Local Plan period, the upper end of the range amounts to an additional 425 new homes over the minimum requirement derived from 513 dwellings per annum.

To help understand the material benefit of the higher of the two requirements, the Council's evidence as to the **need for affordable housing** is instructive. This indicates a need for at least 330 affordable and social rented homes per annum. This is over 60% of the suggested housing requirements. On the basis that the delivery of affordable homes is through the allocation of market housing there is plainly a justification for adopting a higher housing requirement.

Already it is known that **Reading** is not able to provide sufficient housing land to meet its requirement (§6.5 of the consultation document refers). This is calculated by reference to the current Local Plan and SHMA and not the more recent Standard Method requirement which is higher, with almost 300 additional homes each year. On this basis the extent of unmet need from Reading is likely to be significantly higher than the current 230 dwellings which the consultation document refers to.

Given the circumstances associated with Grazeley referred to in the previous Section, the existing settlements that shared those locations characteristics but are not constrained by the Emergency Planning Zone could contribute an amount of housing towards that. For this reason, additional housing to the residual 82 houses should be directed to Mortimer.

It is also instructive that the housing trajectory at Appendix 8 illustrates that over the plan period there is a continuous decline in housing completions over the longer term. This is likely to be exacerbated in the event Sandleford Park does not achieve the 1500 new homes allocated to it in Policy SP16 or that North Thatcham similarly fails to deliver 1,500 new homes allocated to it in Policy SP17.

Sandleford Park comprises two areas of land in separate ownership. Planning permission has been granted for 1000 new homes on the main body of the site, but an application for the residual area, seeking permission for 500 new homes has not progressed for a number of years – the most recent submissions to the planning file appear to be from 2020.

North Thatcham is similarly afflicted by a multiplicity of landownerships which requires a collaborative and comprehensive approach to its future development. We doubt it will therefore achieve the 1500 new homes intended to be provided in the plan period.

The spatial distribution of the allocations is shown in Table 4.2 of the Housing Background Paper; this illustrates that a very similar amount of new housing is proposed in the AONB in comparison with the Eastern Area. As the NPPF advises, great weight should be given to conserving and enhancing landscape and scenic beauty of such a designated landscape and the scale and extent of development should be limited. One would expect a material difference in the amount of housing to be provided between these two spatial areas. In fact, contrasting Policies SP14 and SP15 indicates that more "new" homes are allocated to the AONB than the Eastern Area.

When considered across the Eastern Area, Table 4.2 and Appendix 10 of the Housing Background Paper reveal that all housing sites are expected to be completed by 2031/32 with no housing completions after this year until the end of the plan period. Again, this aspect of the Local Plan is not "positively prepared".

For these reasons, the amount of new housing in the Eastern Area, and at Mortimer specifically, should be increased

Summary

This response to the West Berkshire Local Plan 2022-2039 has been prepared on behalf of Hallam Land Management Limited.

We have identified that, irrespective of the current consultation relating to the NPPF, it is firmly the case that Local Plans should continue to provide a sufficient supply of housing land to meet identified needs.

In this regard, we agree with the Council that there is no basis to reduce the number of new homes that is planned for on the basis of the Government's Standard Method. In fact, because of the inevitable situation where unmet need will arise from Reading, the higher end of the range is still too low and should be increased.

Turning to spatial strategy and the distribution of new housing, to manage the pattern of growth and achieve the most sustainable pattern of development, an additional amount of housing should be provided in the Eastern Spatial Area. For the reasons set out herein, Mortimer is an eminently suitable location categorised as a Rural Service Centre and outside the Emergency Planning Zone which constrains other locations. It is not within the Area of Outstanding Natural Beauty which is subject to a high level of protection.

The notion of no additional housing at Mortimer to that allocated in 2017 and to be developed by 2026, fails to consider longer term needs to the end of this current plan period. In these terms, the Local Plan is not positively prepared.

Located to the east of the Kiln Lane and west of The Avenue, the land which Hallam control measures 7 hectares in size, and is comprised of a horse paddock and a single arable field. The Site could accommodate some 75 new homes which is consistent with the scale and role and function of a rural service centre. In addition, there is potential for elderly persons accommodation and the provision of a new early years facility, which reflects identified needs in the Neighbourhood Plan. Alongside new development would be accessible green space, potentially comprising children's / teenage play space, and allotment provision. These community facilities seek to compliment existing green spaces within the village.

Accordingly, the Local Plan should either allocate land at Kiln Lane or set out an additional amount of housing to be provided by additional allocations in a new Stratfield-Mortimer Neighbourhood Plan.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The Local Plan should increase the housing requirement at Mortimer either by the allocation of land at Kiln Lane or by directing the Neighbourhood Plan to allocate additional land to that currently allocated.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain the matters raised in the attached representation.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The</p>	<p>Yes</p>

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1272
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	PS1272 Opus Works (Calcot Golf Club & Bewley) Table 2
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	Yes

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Policy SP12 - Approach to Housing Delivery</p> <p>This policy states that 8,721 to 9,146 net additional homes are required for the period 1 April 2022 to 31 March 2039, equating to 513 to 538 dwellings per annum. It is noted that the higher figure provided does not constitute a ceiling or cap to development. New homes will be located according to policies SP1, SP3 and DM1. It is important for the council to ensure that the reference to the housing target figure not being a “ceiling or cap to development” is retained in the policy. This is because, this is a positive message to send out, whilst there is a nationally recognised shortage of housing in the UK and any policy that seeks to facilitate additional housing provision at this time is to be encouraged.</p> <p>The policy states that new housing will be focused in and adjoining the larger settlements, including the three growth areas, of which the Eastern Area is relevant to CPGC. Therefore, a development of c.72 dwellings on land at CPGC, on the eastern edge of Tilehurst, will comply with policies SP1 and SP3, which will enable housing to be provided to meet the Council’s housing requirements, as set out in policy SP12. The proposed dwellings will make a valuable contribution to the housing needs of the district (potentially including affordable housing, depending on agreed development quantum and subject to viability). The allocation of land at CPGC within the Eastern Urban Area will comply with this policy, by helping to provide much needed new housing in a sustainable location, where the impacts of development can be satisfactorily mitigated.</p> <p>Policy SP12 – Approach to Housing Delivery is supported. However, it is considered that the text should not be amended to remove reference to the delivery of housing over and above the “target figure” of 538 dwellings per annum.</p> <p><i>[For table 2 see attachment 'PS1272 Opus Works (Calcot Park Golf Club' Table 2']</i></p> <p>Paragraph 6.12 states that the requirement of 9,146 dwellings minus the supply of 7,337, means that sites for a further 1,809 homes need to be found. In addition, there needs to be some built-in flexibility to allow for phasing issues and to allow for non-delivery, particularly of larger sites, which need a great deal of up-front investment in roads and other infrastructure. Therefore, it is important to make it clear that the current shortfall of 1,809 dwellings should also be a minimum and not a ceiling or a cap to development, as required by policy SP12 (see above).</p> <p>It is likely that larger sites will have some problems with delivery. It is unlikely that they will deliver the housing numbers predicted in the suggested timescales, because larger sites are more likely to encounter issues with such matters as site assembly, ownership and title issues, capital funding, infrastructure costs and delivery, planning permissions and legal undertakings, such as section 38, 106 and 278 agreements. Some larger sites, such as North-East Thatcham, are also the subject of vehement objections from residents and may not actually come forward in the local plan period, particularly as sales enquiries and corresponding build rates start to recognisably decline. Overall, it should be expected that the larger sites will not deliver the housing numbers needed in a timely fashion and there is a real need for more medium-sized and smaller sites, of less than 100 dwellings, to help to fill the gaps. Smaller sites can be delivered in shorter time frames, as they do not have the depth of issues that the larger sites have. Therefore, the Council should allocate more smaller sites to ensure that housing needs are met in the short to medium-term.</p> <p><i>Table 2 and Paragraph 6.12 – Housing Supply at March 2022 is supported.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	

4. Proposed Changes	However, it is considered that it should be made very clear that the current shortfall of 1,809 dwellings is a <u>minimum</u> provision and not a ceiling or cap on development.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pittard, Matthew (Represented by Pro Vision)
Consultee Full Name	Mr & Mrs Mathew Pittard
Consultee Organisation	
Agent Full Name	Mr James Blake
Agent Organisation	Pro Vision
Comment ID	PS1702
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:19:00
Attached Files	Pro Vision - Mr & Mrs Pittard
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	No

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Policy SP12 identifies that "Provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development".</p> <p>The target figure of 538 dpa constitutes a 5% uplift on the local housing need (LHN), as calculated using the standard method.</p> <p>However, it is considered there is clear justification for higher housing growth in West Berkshire, required to meet the level of need identified in the evidence, not least in respect of addressing affordability.</p> <p><i>Housing Requirement</i></p> <p>1) <i>The Duty to Co-operate</i></p> <p>The Council, at paragraphs 6.5 to 6.8 of the Plan, acknowledge there is a current unmet need from Reading Borough Council (RBC) of around 230 dwellings, up to 2036 and that there will therefore be a need to consider any further unmet need, given the housing needs generated by the standard method (i.e. the 35% uplift to Reading as one of the largest urban areas in England).</p> <p>The Council also acknowledges the distribution of unmet need has not been agreed and will be subject to further review through the plan-making process, before the need arises.</p> <p>RBC has identified a five year review of its Local Plan is required by 2024, which will need to incorporate an urban capacity assessment. A revised future unmet need figure is therefore likely to be available in the near future. It is anticipated the future unmet need from Reading will be significant as the housing requirement increases from 689 dpa in the current RBC Local Plan to 907 dpa from Lichfield's analysis of the standard method for local housing need (April 2022).</p> <p>At this stage, however, and without further evidence there is no certainty on what the unmet need will be, or how it will be distributed. It is widely accepted that RBC has limited land capacity to deliver the additional housing requirements in full. Therefore, it is highly likely that neighbouring authorities, such as West Berkshire, will be required to assist with meeting a portion of the unmet need.</p> <p>To address this incoming significant future unmet need from RBC, we consider the LPR should allow for a higher degree of flexibility as part of its housing strategy.</p> <p>2) <i>Affordable Housing and Affordability Uplift</i></p>

We note the Vision at Chapter 3 of the LPR sets out the Council will ensure that delivering “housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability”.

The Updated Housing Needs Assessment (July 2022) confirms there is a “notable need for affordable housing, and it is clear that provisions of new affordable housing is an important and pressing issue across the District”. The conclusions drawn identify “the evidence does.... suggest that affordable housing delivery should be maximised where opportunities arise”.

The Assessment advises the scale of affordable housing need is 697 dpa (a 188% increase on need, following the Council’s Housing Needs Assessment in 2020). This equates to 136% of the standard method minimum LHN. Accordingly, the Assessment advises that, theoretically, if 40% of all new housing delivered was for affordable housing, around 1,740 dpa would be needed to meet the Council’s affordable housing need in full (paragraph 3.24). The Council’s affordable housing position is therefore undeniably deteriorating.

It is acknowledged the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and therefore reduced affordable housing needs) through the affordability uplift in the standard method. However, the Council’s past housing delivery rates have generally been in line, if not greater, than the current minimum LHN, yet affordability issues and affordable housing need remains.

As a result, by failing to positively address the affordability issues and affordable housing need across the District within this plan period could give rise to significant social and economic consequences. These do not appear to have been given full consideration by the Council, including as part of the Sustainability Appraisal for policy SP12.

For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement for the District. The current proposed level of housing is not ambitious enough and will likely be unable to deliver on the Council’s ‘Vision’, which provides the context of the LPR. Therefore, we advise the strategic policies and housing requirements are inadequate and will not deliver on the principles or key priorities of the LPR.

3) The Uncertainty Buffer/Uplift

2.23 The Council provide for a buffer/uplift on the minimum LHN of 5%, arguing that this is to boost supply and to provide for some built-in flexibility.

We contend the Council should be concerned that limiting the housing supply to such a small buffer will significantly restrict the delivery of new homes. Therefore, amongst other issues, it will result in further housing prices increases to levels which create cost barriers to local residents and workers. There are many factors and variables which can affect housing supply, particularly where “about 90% of the District is rural in character” (LPR paragraph 2.1), therefore there is clear justification for a significantly larger buffer. A prime example of unforeseen circumstances affecting housing delivery include the recent issues relating to phosphates associated with the River Lambourn.

We consider an appropriate buffer will provide the LPR with greater flexibility to adapt to circumstances, should the anticipated housing supply fail to be delivered as expected. This is considered further in Section 3.

An appropriate uplift to the housing requirement is likely to fall between 10% and 20%, which would increase the Council’s housing target requirements to 564 to 616 dpa. This equates to finding a supply of 9,588 to 10,472 dwellings up to 2039 and follows the approach taken by other local authorities who have recently adopted Local Plans (South Oxfordshire c. 27% buffer, Maidenhead c. 12% buffer and North Herts c. 13% buffer. In addition, the draft Wokingham Local Plan currently provides for a 20% buffer.

We note the Regulation 18 version of the LPR included a 10% buffer/uplift. However, this figure was reduced to 5% in the Housing Background Paper (January 2023) to provide a balance between boosting housing supply in the District and considering the limitations and constraints of a largely rural District (paragraph 2.33).

This approach appears to be counter-intuitive as the greater the level of constraint, the greater the need for a higher buffer to provide for reasonably prospects of meeting the housing need. This is particularly the case where one of the LPR’s priorities is to improve affordability in the District. Furthermore, the SA/SEA undertaken identifies at Appendix 4, Section 2.1 that between LHN+5% and LHN+10%, the LHN+10% scores significantly higher, with an ‘overall positive, with some significantly positive effects’. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue pressure. The SA/SEA therefore takes the more precautionary and seemingly flawed approach which is unsuitable when considered against the LPR’s objectives.

The Council has failed to provide any justification to say what a 10% buffer/uplift (or greater) to the housing requirement cannot be accommodated within the District. None of the key environmental constraints (i.e. AONB) in the District, or the rural nature of the District preclude the principle of residential development (different approach to floodplain, Green Belt, internationally protected habitats etc.). Instead, the broad and high level spatial strategy will be used to shape the form and direction of growth across the District. There is therefore no justification to identify such a reduction in the buffer, particularly where clear evidence exists to show many more sites are available in the HELAA to accommodate the District’s future growth.

Summary

Overall, it is considered the level of housing currently proposed by the LPR is insufficient to support the Government’s objective of significantly boosting the supply of housing, is significantly below the Council’s aspirations of achieving and addressing the affordability problem and affording housing need issues within the District.

Further the strategy proposed fails to take into account the potential for unmet need arising from neighbouring authorities (particularly from RBC), given the changes in local housing needs.

We consider the buffer is too low, given the level of constraint and the variables across the District that affect the delivery of new housing, taking into account the level of available sites which have been identified in the HELAA.

It is considered this justified increasing the Council's housing target to between 564 and 616 dpa (i.e. a 10% to 20% buffer/uplift to the minimum LHN). This would equate to finding a supply of between 9,588 and 10,472 dwellings up to 2039. This level of housing will ensure a sufficient degree of flexibility is incorporated into the LPR to deliver the minimum LHN, whilst providing for choice and contingency to the market, reflective of the current and future demographic trends and housing market signals and affordability in West Berkshire.

Accordingly, the Council's housing target fails to meet the test for soundness in the NPPF (2021) as the LPR is not positively prepared, effective or consistent with national policy.

Meeting Housing Need

Housing Supply

The NPPF, at paragraph 11(b) identifies that "strategic policies should, as a minimum, provide for objectively assessed needs for housing...". The LPR sets out several sources for the provision of its housing supply over the plan period, summarised in Table 2 of the Plan. These sources include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the LPR and Neighbourhood Plans.

Existing Allocations

The history of some of the sites identified in the supply which do not currently have planning permission (around 95 units, excluding Sandleford Park West), or only have outline permission (392 units, excluding Sandleford Park East), or where a site's delivery has been continually delayed clearly fails to provide confidence in their timely delivery. It is therefore considered that a 10% non-implementation rate should be factored into at least some of this supply to provide a more robust strategy for delivery.

Non-allocated Sites with planning permission

Table 2 of the LPR identifies that around 1,958 dwellings are to be provided on un-allocated sites (including prior approvals), with planning permission. Again, it is considered a 10% nonimplementation rate should be applied to this figure to provide a more robust delivery strategy, particularly as it is unlikely that all these permissions will be delivered.

Windfall Allowance

A windfall allowance of 1,949 dwellings (equating to 26.6% of the total housing supply) up to 2039 has been included. This has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 and 2022.

It is recommended the Council removes, or significantly reduces, this windfall allowance as this will provide greater certainty over the supply of housing through allocations, without having to rely on the use of a windfall allowance, which by its very nature can be ambiguous. The most recent consultation on the revised NPPF and the draft Levelling Up and Regeneration Bill (LURB) both place a greater emphasis on the need to provide a genuinely plan-led system.

We note the Council consider the delivery of windfall sites has been consistent and reliable, but have failed to provide any evidence about future supply to justify such an approach.

There appears to be recent trend that opportunities for windfalls are reducing on small sites. Table 3.1 of the Housing Background Paper identifies that delivery over the last three years (2019/2020 to 2021/2022) has reduced to an average of only 97 completions, whilst in the last five years the annual average is also only 112 completions. This is notably lower than the LPR's anticipated 140 dpa.

In reviewing the figures quoted above, the Council is planning to deliver 7-25 dpa above its LHN, which equates to an additional 119-425 dwellings over the 17 year plan period. As a result the windfall allowance of around 140 dpa should be removed altogether, or replaced with a significantly reduced figure, given recent trends.

The implications of this are significant as even a relatively modest, but more realistic reduction to 100 dpa would reduce the total housing supply by at least 549 dwellings. The solution is for a far more positive approach to planning by taking forward more of the sites available in the HELAA. This will reduce the reliance of windfall sites and provide greater certainty over the supply of housing through allocations. It will also improve overall affordable housing provisions.

Furthermore, paragraph 6.22 of the LPR explains that "approximately 74% of completions in the period 2006-2022 were on unallocated, windfall sites". This suggests that a high proportion of planning decisions in West Berkshire have not been plan-led, which conflicts with NPPF paragraph 15, despite the Council's assertion that the windfall allowance of 140 dpa is relatively modest.

To ensure that planning decisions remain plan-led, alongside providing greater certainty over housing supply, we consider it prudent to reduce the windfall allowance and increase the number of housing allocations. The inclusion of additional allocations for residential development now would assist with the aim to plan holistically, instead of relying on 'piecemeal' developments through windfall sites.

Future Supply

Notwithstanding the above comments regarding the LPR's approach to housing supply in the District, the LPR explains there is a need to identify sites for a further 1,809 dwellings to meet the 538 dpa target (or 9,146). The LPR allocates approximately 1,720 homes (including 1,500 at North East Thatcham) and a further 80 dwellings are expected to come forward through Neighbourhood Plans.

Paragraph 6.11 explains that "The allocation of sites in the LPR aims to meet delivery of a higher number of homes in order to both boost supply and have some built-in flexibility. The upper end of the range is

a target but should not be considered a maximum amount. It is not intended to be a cap on development that would otherwise be acceptable”.

The aim to boost supply complies with NPPF paragraph 60. Furthermore, built-in flexibility ensure the LPR is flexible and adaptable to change (paragraph 11(a) of the NPPF). However, to enable decisions regarding new development to remain plan-led (NPPF paragraph 15) and see that land is brought forwards at a sufficient rate (NPPF paragraph 23), it is necessary to ensure there is enough flexibility in the LPR.

Such a contingency is important, particularly as the Council is relying upon two large complex sites at Sandleford Park and North East Thatcham, discussed below, to deliver a significant proportion of the District's housing needs (3,000 dwellings in total).

Housing Trajectory

3.16 The Council are already short of their housing target figure by 9 dwellings (LHN+5%). However, it is considered the housing trajectory during the plan period is not realistic. This is particularly with regard to the strategic allocations identified.

Sandleford Park (Policies SP13 and SP16)

This is an allocated site which was first allocated in 2012 and makes up a significant portion of the LPR's delivery of housing across the plan period. The site is split into two parcels, known as 'Sandleford East' and 'Sandleford West'.

Appendix 2 of the Housing Background Paper identifies the housing trajectory, including the phasing of individual sites. The Council content that Sandleford East, which benefits from outline planning permission, will begin delivery 100 dpa from 2025/2026 through to 2034/2035, with 80 dwellings to be provided during the years 2035/2036.

This trajectory appears to be overly optimistic, particularly given the previous planning delays over the site and that a reserved matters application has yet to be submitted for any phase(s) of the development. There is also a need to address several pre-construction planning conditions. As such, the start date of 2025/2026 for first completions to be achieved by seems to be a 'best case scenario', although unlikely to be accomplished.

It is understood the site is to be delivered by a single housebuilder. This could therefore lead to a lower absorption rate due to a lack of variety of housing product, in accordance with the findings of Letwin's Independent Review of Build Out (October 2018). The 100 dpa expected across the plan period is considered to be impractical and will affect the site's delivery over the plan period.

In relation to Sandleford West, this site does not have any planning permission. This is despite an outline application being submitted in April 2018. It appears the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/2028 are purely speculative. There will also be a requirement to submit and agree reserved matters and address any pre-commencement conditions ahead of ground being broken.

As such, it is considered the Council's reliance on the delivery of Sandleford Park during the plan period should be approached with caution. The Regulation 18 Consultation on the LPR identified that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems to be a more robust figure than the 1,580 dwellings currently proposed and a more practical basis for the LPR's housing delivery strategy.

North East Thatcham (Policies SP13 and SP17)

This is another major allocated site being relied on heavily by the Council for the delivery of housing over the plan period, however the Council have reduced the delivery of site from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council anticipate the site will deliver 1,500 homes over the plan period (although this has increased from 1,250 dwellings expected at the Regulation 18 stage of the LPR). This appears to be unjustified for the following reasons:

Justification for North East Thatcham

The supporting evidence base for the allocated site, including the Thatcham Strategic Growth Study (which includes a Vision and Concept Plan) still refers to the delivery of 2,500 homes. It has not been updated to reflect the position in the current version of the LPR. This also includes Viability Testing, which tested 2,300 to 2,500 new homes. This work would need to be updated to allow for the LPR to be found sound.

In addition, the site allocation policy refers to the delivery of a secondary school. However there is no updated viability appraisal to confirm this is deliverable for a site of 1,500 new homes in total, raising the following concerns:

- The Thatcham Growth Study (TGS) (Stage 3) acknowledges that strategic development at this scale (for 2,500 new homes) is the only approach likely to deliver an additional secondary school for the town, without which any growth would cause issues in provision.
- The TGS (Stage 3) notes the scale of development (2,500 new homes) would not create the need for a secondary school development on its own. Therefore, is only half-funded by developer contribution. A reduction to 1,500 homes further undermines this and is likely to increase the funding gap further, with no indication of how this would be resolved.
- A secondary school would internalise a significant number of trips from the proposed development. The Access and Movement Report for North East Thatcham, within the TGS (Stage 3) assumes a secondary school will have 50% internal trips. Therefore, with questions surrounding the potential delivery of a secondary school for a site of only 1,500 new homes, the sustainability credentials of North East Thatcham are unclear.

As a result, the identification of North East Thatcham is potentially not justified as there are significant gaps in the evidence to support the allocation of the site for 1,500 new homes. In particular, the lack of delivery of a secondary school and reduction in housing numbers would remove the key justification for growth at this location to help deliver new education provisions and additional community infrastructure.

Appendix 4 of the SA/SEA acknowledges this, however the Council still seek to proceed on this bases as it is considered that 2,500 new homes in Thatcham is too great.

Scale and timescales for Housing Delivery

In addition to the above, the Council's assumptions on the expected housing supply from North East Thatcham are also unreasonable. The Housing Background Paper demonstrates the Council expect the site to start delivering 150 dpa from 2029/2030 to 2038/2039. We consider this to be overly optimistic.

Market evidence demonstrates that schemes of 1,500 dwellings typically take approximately 7 years from the validation of an application through to first completions (footnote 2). Given the timescales for the adoption of the LPR (the Local Development Scheme indicates adoption in late 2024) and assuming a planning application for the site is submitted by the end of 2024/2025, first completions are not able to be projected before 2031/2032. The timescale proposed by the Council for delivery is optimistic, given there is a need to prepare and agree to a coherent masterplan or development framework, if prior mineral extraction is necessary and/or there are delays to the adoption of the LPR. In addition, as noted with Sandford Park, the Council has a previous poor record over the delivery of its strategic sites within their expected timescales.

Market evidence also suggest that for sites of 1,500 new homes, a realistic average annual build-out rate is around 100 to 120 dpa³. Therefore, delivering completions from 2031/2032 at 120 dpa is likely to only equate to 960 dwellings at best over the plan period, resulting in a shortfall of 540 dwellings on this allocate site alone.

Summary

Table 3.4 of the Housing Background Paper sets out the housing supply and future supply for the Council during the plan period. The following table provides a comparison with our analysis and findings above:

<for table see attachment>

With the figures in Table 1 in mind, it is clear the Council's housing supply fails to meet the minimum LHN (8,721 dwellings). Further, even by discounting the expected housing shortfall from North East Thatcham during the plan period, this results in the total loss of any headroom built in by the 5% buffer/uplift. The Council's housing supply would therefore fall short of meeting the minimum LHN (where 9,137 – 540 = 8,597).

As such, the Council's housing target fails to meet the test for soundness in the NPPF (2021) as the LPR is not positively prepared, effective or consistent with national policy.

In summary, the LPR should be allocating more sites for housing over the plan period that are consistent with the broad spatial strategy, noting that there are many available sites within the HELAA which have been overlooked, including our client's site 'Land at Lower Way Farm' (HELAA ref: THA9).

The level of housing shortfall, potentially around 2,363 to 3,247 dwellings when providing a 10 to 20% buffer to the LHN, in accordance with the comments outlined in Section 2, is significant. This shortfall should therefore be addressed through additional allocations to the LPR, rather than any early or immediate review of the Local Plan, which would be to defer difficult, strategic planning decisions rather than demonstrating a positive approach to planning now.

Conclusion

Our clients have concerns that the Council's LPR is currently unsound, having regard to the tests of soundness at paragraph 35 of the NPPF. It is considered there are a number of matters which indicate the proposed strategy fails to be robust enough to be sound and is therefore liable to fail in its objectives. There is justification to increase both the housing and employment requirements to address these issues, including:

- The LPR's priority to improve affordability and to deliver additional affordable homes;
- The need to boost supply significant and to build in greater flexibility in the LPR, if the anticipated housing supply does not delivered as expected;
- Unmet need from neighbouring authorities (i.e. RBC); and
- The LPR's property to facilitate and support a strong, diverse and sustainable economic base across the District.

The Council's justification for the allocation at North East Thatcham is also potentially unsound, given the lack of updated evidence and the reduction in housing numbers.

As a result and noting the significant amount of available land identified in the updated HELAA which has been overlooked, including our client's site, it is concluded that a suitable solution would be for the LPR to allocate more sites for housing over the plan period, consistent with the broad strategy of focusing development on the most sustainable settlements, including Thatcham, in accordance with Policy SP3 (settlement hierarchy).

Attachment:

- Full Rep

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

No

Please give reasons for your answer

4. Proposed Changes

With the above in mind, it is considered that the Council's housing target should be increased to between 564 to 616 dpa (i.e. to provide a 10% to 20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 to 10,472 dwellings up to 2039.

	In addition, the Council's housing supply would fail to meet the minimum LHN. This is particularly due to the LPR's reliance on large strategic sites (Sandleford and North East Thatcham) and windfall sites. This approach is questionable in terms of the timescales for housing delivery and annual rate of completions, not to mention that windfall sites are, by their very nature, not guaranteed.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	To ensure that the views of our client in respect of 'Land at Lower Way Farm, Thatcham' and the shortcomings identified in the Local Plan Review and its evidence base relation to the allocation of sites and land for housing and economic delivery are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1554
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	No

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>These representations have been prepared by Turley on behalf of Pangbourne College and provide comments on the Regulation 19 Consultation currently taking place in relation to the West Berkshire Local Plan Review 2022- 2039.</p> <p>As you will be aware our client has important land interests in the Local Plan area, including the Pangbourne College estate. The majority of the estate lies to the north of Pangbourne village and surrounds the main core of the college, sports facilities and boarding houses. Additional land within the College's ownership includes the Boathouse on the western edge of the village.</p> <p>These representations provide commentary on the consultation document as a whole, as well as specifically in relation to two parcels of land within our clients' ownership. Separate representations are submitted in relation to other parcels of the College's land.</p> <p>LOCAL PLAN CONTEXT</p> <p>The current Development Plan comprises the Core Strategy (adopted 2012) and the Housing Site Allocations DPD adopted in 2017. The Core Strategy covers the plan period up to 2026 and is premised on the housing need set out within the now revoked South East Plan.</p> <p>This consultation relates to the Local Plan Review covering the period up to 2039. We fully support the principle of the Council reviewing the plan as it provides the opportunity for development needs (for new homes, employment and other land uses) to be considered based on an up-to-date evidence base. Furthermore, it provides the opportunity for the Council to take into consideration any unmet needs from neighbouring authorities and the need to fulfil the Duty to Co-operate.</p> <p>There are some significant physical and technical constraints within the District, including AWE Burghfield and Aldermaston and area of flood plain. The AONB is a policy and landscape designation that covers over 60% West Berkshire, however, not all areas of the AONB are of such a high quality as to warrant their immediate dismissal from consideration in terms of allocating housing site.</p> <p>HOUSING REQUIREMENT AND THE SPATIAL STRATEGY</p> <p>The Local Plan Review will make provision to provide between 8,721 and 9,146 new homes during the plan period which will equate to between 513 and 538 dwellings per annum. This range is the minimum requirement derived by using the standard method plus a 5% buffer. The plan makes reference to needing to accommodate Reading's unmet need of 230 dwellings.</p> <p>The LPR does not seek to allocate sufficient housing sites to meet this identified need, instead leaving some of the housing requirement to be delivered through Neighbourhood Plans. This approach does</p>

	<p>not provide certainty that the housing requirement will be met within the plan period as there are no current Neighbourhood Plans which are proposing to allocate new housing sites.</p> <p>The plan is not considered to be justified in its approach as it seeks for the remainder of its unallocated housing need to be met through windfall sites and neighbourhood plans instead of allocating developable and available sites. Therefore, we do not consider the strategy to be appropriate.</p> <p>We do not consider that the plan will be effective in delivering the amount of development needed in the area as it fails to fully address its housing need through site allocations.</p> <p>For these reasons, we consider that the plan cannot be considered to be sound.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	In order to ensure that the Inspector understands the merits of the sites available for development at Centenary Fields and Bere Court Road
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1775
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Draft Policy SP12 sets out provision for 8,721 to 9,146 net additional homes over the Plan period, comprising 513 to 538 dwellings per annum (dpa).</p> <p>Importantly, Paragraph 61 of the NPPF states that the standard method for calculating housing need should be used to 'inform' the 'minimum number of homes needed'. It is noted however that the provision for 513-538dpa is based directly on the minimum Local Housing Need plus minimum 5% buffer required by NPPF paragraph 74.</p> <p>As set out in the AMR (Table 3.4), the Core Strategy housing requirement of 525 dwellings per annum has not been met in 7 of the previous 13 years and therefore there is currently a shortfall of 310 dwellings against the Core Strategy requirement. The Housing Needs Assessment Update (July 2022) also confirms that there is a pressing need for affordable housing in the District. In addition, Reading Borough Council has also identified a shortfall of 230 dwellings which has been agreed to be met within West Berkshire (as referred at LPR paragraph 6.7), and which is likely to increase further given that the standard method now applies a 35% uplift to the 20 largest urban centres including Reading.</p> <p>It is noted also that paragraph 2.27 of the Housing Background Paper explains officer's view that 'a higher number than the current Local Housing Need (LHN) in West Berkshire should be planned for' and paragraph 2.36 adds that 'The Council would plan to meet the upper end of the range in an effort to boost supply and ensure there is built in flexibility'. The accompanying Sustainability Appraisal (November 2022) (Appendix 4) also concludes that the option of planning for the LHN + 10% (option 2a) would</p>

	<p>provide some significantly positive effects and notably more positive effects than compared with the other options of planning for the LHN (option 1) or the LHN + 5% (option 2b).</p> <p>In this context, given recent under-delivery and the unmet and increasing needs of Reading, it is recommended that the housing target is increased to include additional provision above the minimum LHN plus 5% requirement to include sufficient flexibility and ensure that local needs are met, as well as meeting the objectives of national policy to meet the housing needs of present and future generations (paragraph 8), and significantly boost the supply of new homes (paragraph 59)). It is also important that the housing target is not applied as a ceiling or cap to development, as set out in draft Policy SP12.</p> <p>The LPR should be subject to ongoing monitoring, in accordance with the NPPF, in order to ensure that sufficient housing is being delivered based on the LPR target, and be flexible enough to respond to non-delivery of identified sites or changing circumstances during the plan period, e.g. changes to the DEPZ.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wokingham Borough Council
Consultee Full Name	Wokingham Borough Council
Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1441
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>Reading Unmet Housing Need</p> <p>West Berkshire District Council (WBDC) forms part of the Western Berkshire Housing Market Area, alongside Wokingham Borough Council (WBC), Reading Borough Council (RBC) and Bracknell Forest Council (BFC). This grouping forms the basis for joint working on strategic planning matters. The Memorandum of Understanding (MoU) (October 2017) sets out the agreed position across the authorities that the housing need arising from the Western Berkshire HMA should be met within the Housing Market Area.</p> <p>The RBC Local Plan was adopted in November 2019, and plans for at least 689 homes per annum. Reading's local plan was submitted in March 2018 when housing need was based on the Berkshire Strategic Housing Market Assessment (SHMA) figure of 699 dwellings per annum between 2013 and 2036. This leaves 10 homes per annum, or a total of 230 homes over the plan period, as unmet need. This shortfall is expected late in Reading's plan period (to 2036).</p>

The Plan recognises (at paragraph 6.6) this unmet need of 230 dwellings and notes the Statement of Common Ground between the Western Berkshire HMA authorities that this need should be met within the Western Berkshire HMA. The Plan's response to this unmet need is to note the requirement for RBC to review its plan by 2024, which will need to consider how to deal with housing needs generated by the standard method.

It is important to note that the future local plan for Reading will consider the starting point for housing through the standard method set out in national planning policy and practice guidance. Following revisions to the standard method in December 2020, Reading Borough is identified as one of the 20 largest urban areas in England, where the 'cities and urban centres uplift' applies a 35% increase to the local housing need calculation.

Notwithstanding, the position is that a shortfall of 230 dwellings exists from RBC against the adopted plan.

The WBDC Plan includes a supply of housing which exceeds LHN by 416 dwellings.

Additionally, it is noted that that if a less cautious windfall allowance was assumed in the Plan, developments on large and medium sites would be capable of addressing the unmet need of 230 dwellings in part or full (based on past trends). WBC request the Plan is updated to confirm that it contains a buffer to contribute to Reading's unmet housing need, if required. This would be consistent with the approach taken in the Bracknell Forest Local Plan, where the Inspectors have recently published their post hearing letter (<https://consult.bracknell-forest.gov.uk/file/6134773>). The letter confirms the plan is legally compliant and capable of being made sound with modifications.

Housing Supply

Wokingham Borough Council (WBC) supports the plan approach to the provision of housing.

At the time of preparing the Plan, the Local Housing Need (LHN) for West Berkshire District was calculated by the standard method as 513 dwellings per annum (dpa) at 1 April 2022. This equates to a minimum housing need of 8,721 additional homes in the period 2022 – 2039.

Policy SP12 – 'Approach to Housing Delivery' states that:

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

The housing requirement is expressed as a range, the lower end being the LHN figure and the upper end comprising LHN plus approximately 5% uplift.

Existing housing commitments, allocations in the adopted plan, and anticipated windfall developments account for 7,337 dwellings. Further land to supply a further 1,809 dwellings is required to meet the higher 9,146 figure (538 dwellings per annum).

Housing/mixed use allocations are set out in Policies SP13 – 15. The Plan sets out new allocations to provide 1,720 homes within the plan period. It additionally identifies a requirement for Neighbourhood Plans to deliver 80 dwellings (55 in Hungerford and 25 in Lambourn), which are both being prepared. Together, this equates to a new supply of 1,800 homes.

Overall, the housing supply in the Plan is 9,137 dwellings (1,800 from new allocations plus 7,337 from existing commitments and windfall). This exceeds the minimum LHN of 8,721. It falls modestly short of the upper end (9,146) by 9 dwellings.

WBC acknowledges that the Plan approach to windfall development is cautious in excluding an allowance from medium and large sites despite past trend data. This cautious approach is considered reasonable. If a less cautious approach was taken to windfalls, the upper end of the housing requirement range would be capable of being met, and exceeded.

In any event, the plan includes supply which is capable of exceeding LHN in accordance with national policy. WBC therefore considers the Plan to be sound regarding meeting its housing need.

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

- * Yes
- * No

Yes

Please give reasons for your answer	The Plan sets out a strategy which is capable of exceeding housing needs in accordance with national policy and which is not considered to give rise to significant cross boundary implications for Wokingham Borough. WBC therefore considers that the Duty to Co-operate has been met in this regard.
4. Proposed Changes	<p>Reading Unmet Housing Need</p> <p>Though not considered a soundness issue, WBC request WBDC update the Plan to confirm that it contains a buffer to contribute to Reading's unmet housing need if required, consistent with the approach taken in the Bracknell Forest Local Plan main modifications and the Inspectors' initial recommendations.</p> <p>Housing Supply</p> <p>N/A</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North East Thatcham Partnership (Represented by Lichfields)
Consultee Full Name	North East Thatcham Partnership
Consultee Organisation	North East Thatcham Partnership
Agent Full Name	Pippa Nisbet
Agent Organisation	Lichfields
Comment ID	PS1492
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes	Yes

* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>Our representations are prepared in relation to the strategic promotion of land known as North East Thatcham ("NET") on behalf of "the Partnership" which comprises A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land who are jointly promoting the land ("the site") on behalf of its landowners. The Partnership has signed a collaboration agreement to ensure that the site at NET comes forward as a whole, thereby avoiding piecemeal development. The agreement should give the Council confidence that a comprehensive approach will be delivered and the Partnership remains fully committed to progress a planning application as soon as the site's allocation within the Local Plan is secured</p> <p>We support the plan's positive approach to increase housing delivery through the Plan Period and that new homes will be delivered in line with the Spatial Strategy and Settlement Hierarchy in addition to considering Policy DM1: Development in the Countryside. This will ensure that development comes forward on appropriately allocated sites and for development of appropriate density.</p> <p>We support that the target figure of 538 dwellings per annum does not constitute a ceiling or cap to development. The NPPF is clear at paragraph 60 that the objective is to boost the supply of housing and West Berkshire's Housing Background Paper (January 2023) states at paragraph 2.27, "<i>It is considered that a number higher than the current LHN in West Berkshire should be planned for.</i>"</p> <p>In addition to the NPPF objectives to boost housing supply, the Council notes that other reasons why a higher number should be planned for include:</p>

	<p><i>“- The most recent objectively assessed need in the OAN Sensitivity Testing report of March 2018 was 600 dpa. Though the methodology has been superseded and it is no longer a recent study, it remains a consideration;</i></p> <p><i>-The need for flexibility as the impact of annual changes to the LHN, as a result of the rolling forward of the time period covered by the household projections and the updating of the affordability ratio, is uncertain; and</i></p> <p><i>-The need for flexibility to allow for phasing issues and for an element of non delivery of sites.”</i></p> <p>It is also worth noting that the Government’s Planning Practice Guidance (Housing and economic needs assessment), last updated 16 December 2020, states at paragraph: 015 Reference ID: 2a-015-20190220 that, <i>“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”</i> This aligns with the NPPF focus on positively prepared plans, and clearly points to the basis for LPAs to go above the minimum starting point.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	Please refer to our response on Policy SP17.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan

Agent Organisation	Boyer Planning
Comment ID	PS1618
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	EXECUTIVE SUMMARY

Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. Boyer have prepared these representations on behalf of Sovereign, in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039).

The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness. To this end, general support is provided to the spatial strategy set out in the West Berkshire Local Plan Review (2022 – 2039), to the Council's conduct of the plan-making process in relation to the Duty-to-Cooperate, and specifically for the allocation of Land Adjoining The Haven, Kintbury, for residential development.

The Proposed Submission West Berkshire Local Plan (2022 – 2039) ('emerging local plan') proposes to allocate a series of sites to, as a minimum, meet the identified housing needs within the district. Despite the constrained nature of the district, the plan identifies a robust selection of sites that are capable of delivering residential development appropriate to accommodate sustainable growth to meet the minimum local housing need of the area.

Sovereign supports this approach, recognising that the Council's commitment to accommodate the identified minimum Local Housing Need ('LHN') figure within the district is paramount.

The Council's identification of sufficient developable land to deliver approximately 5% additional homes above the minimum identified need is also supported. Sovereign considers that this 5% 'headroom' provides for a flexible and robust quantum of housing supply to fully ensure that the identified housing needs of the district are met.

Furthermore, the identified headroom in the housing supply could usefully accommodate a proportion of the unmet need that is likely to arise from Reading, as part of the Western Berkshire Housing Market Area ('HMA'). Sovereign supports the Council in seeking to accommodate a reasonable proportion of this unmet need and recommends that the Council seek to maximise the delivery of new homes on the proposed site allocations to assist in delivering this aim. Such an approach would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing, ensuring minimum housing needs are met.

In seeking to deliver the amount of new homes required in the district, the Council have identified an appropriate spatial strategy. The emerging local plan recognises that there is limited further growth potential at the district's most sustainable settlements; namely, Newbury and Thatcham, alongside the Eastern Urban Area, whilst maximising the available land within the relevant site allocations. Sovereign supports the Council's identification of a spatial strategy which directs development to available land within the next most sustainable locations as appropriate, in accordance with the settlement hierarchy.

The otherwise relatively unconstrained nature of the North Wessex Downs Area of Outstanding Natural Beauty ('AONB'), in combination with the presence of a series of sustainable medium and smaller-sized Service Villages, provides that the North Wessex Downs AONB Spatial Area (as identified in proposed Policy SP1) remains appropriate to accommodate a reasonable proportion of the district's identified housing needs.

To maintain the longer-term vitality of the district's Service Villages, such as Kintbury, it is imperative that the Council supports the sustainable growth of these areas, supporting the viability of local services and amenities, alongside delivering much-needed affordable housing in rural areas. To this end, Sovereign supports the identification of specific site allocations within these villages, which provide opportunities for modest sustainable growth whilst conserving and enhancing the special landscape qualities of the AONB.

Sovereign therefore supports the identification of Land Adjoining The Haven, Kintbury ('the site') as being suitable for allocation within the emerging local plan, through proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'. Kintbury comprises a relatively unconstrained settlement that can accommodate sustainable growth during the plan period. The site is well-positioned to make a reasonable contribution to meeting the district's development needs.

The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities provided in the village, benefitting from good access to nearby main settlements including Newbury (by bus and rail), Reading, and London Paddington (by rail). There are not considered to be any significant constraints to the development of the site, which could provide at the very least a minimum of 20 high-quality new homes.

Sovereign is able to confirm that the site is available for development now, offers a suitable location for residential development, and is achievable with a realistic prospect that housing can be delivered on-site within the first five years of the proposed plan period. Consequently, the site should be considered favourably in relation to planning practice guidance and its proposed allocation within the emerging West Berkshire Local Plan is supported.

Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant and is capable of being found Sound following independent Examination. Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.

INTRODUCTION

Context

Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. The Site Location Plan is provided at Appendix 1: Site Location Plan.

Sovereign holds a specific land interest within West Berkshire, known as Land adjoining The Haven, Kintbury ('the site'). These representations are aligned with this land interest and address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base, accordingly.

The site has been assessed by West Berkshire District Council ('the Council') within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. Furthermore, the site is proposed for allocation within the Local Plan Review document, to accommodate residential development, under proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.

The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness, as set out at paragraph 35 of the NPPF; namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:

- a) Positively prepared – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs.
- b) Justified – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.
- c) Effective – deliverable over the plan period and based on effective joint working.
- d) Consistent with national policy – enabling the delivery of sustainable development.

At this stage of the plan-making process, it is essential that West Berkshire District Council ('the Council') continues to pursue an approach that is consistent with national policy, effective, justified, and positively prepared. These representations comprise our recommendations to assist the Council in achieving such an approach, as emerging plan progresses toward adoption.

These representations build upon and should be considered in conjunction with the previous representations submitted by Sovereign to the 'Regulation 18' consultation on the West Berkshire Local Plan Review 2020 – 2037: Emerging Draft (December 2020), which ran from 11 December 2020 to 5 February 2021.

Policy Context

The Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council then adopted the Housing Site Allocations Development Plan Document in May 2017, to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the district therefore sets out the spatial strategy to meet development needs up to 2026 and provides a series of site allocations and planning policies that seek to deliver that strategy.

To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The draft plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption, which is anticipated in 2024.

Sovereign **supports** the Council's commitment to review the existing development plan through this process.

THE SCALE OF HOUSING NEED

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

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

Calculating Housing Need

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

The National Planning Policy Framework ('NPPF') [footnote 3: Available online at:

[https://assets.publishing.service.gov.uk/](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

[government/uploads/system/uploads/attachment_data/](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

[file/1005759/NPPF_July_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)] confirms, at paragraph 61, that:

"...to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach".

The Government's Standard Method for calculating housing need is set out clearly in Planning Practice Guidance ('PPG') [Footnote 4: Available online at:

[https://www.gov.uk/guidance/](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#identifying-the-need-for-different-types-of-housing)

[housing-and-economic-development-needs-](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#identifying-the-need-for-different-types-of-housing)

[assessments#identifying-the-need-for-different-types-of-housing](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#identifying-the-need-for-different-types-of-housing)]. Proposed Policy SP12 clarifies that the appropriate LHN figure for West Berkshire comprises 513 dwellings per annum ('dpa), derived using

the Government's Standard Method. No exceptional circumstances have been identified that apply to West Berkshire which justify the use of an alternative approach to the government's Standard Method. We do not consider that there are any, particularly given the high bar that this test requires, and that the Standard Method represents the appropriate basis for calculating the District's housing need.

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

PPG clarifies that there are various circumstances in which it may be appropriate for an authority to plan for a higher number of homes than indicated through the LHN calculation. Such circumstances include, but are not limited to, situations in which an authority has agreed "to take on unmet need from neighbouring authorities, as set out in a statement of common ground" [Footnote 5: *Ibid*. PPG Paragraph: 010 Reference ID: 2a-010-20201216].

Furthermore, it is considered to be prudent for local authorities to identify a quantum of supply that provides sufficient flexibility to ensure that the housing requirement would be delivered in practice. Typically, this is reflected in the provision of an amount of headroom in the supply over the minimum target, to account for potential market conditions that may cause some of the identified development sites to be delayed or wholly inhibited from coming forward throughout the plan period.

To this end, the Council has identified an approach to housing need that reflects a range, between the LHN minimum of 513 dpa to 538 dpa. Sovereign **supports** the Council's approach. The identification of an appropriate housing target that is approximately 5% above the LHN minimum figure is considered to be sufficiently robust, as this is considered to assist in ensuring that the identified supply meet, at least, the district's minimum housing needs.

Unmet Need Arising Outside of West Berkshire

Notably, the Government's Standard Method calculation does not take account of unmet need arising from outside of the authority's area. However, as noted within the emerging local plan, West Berkshire district falls within the Western Berkshire Housing Market Area ('HMA'), which also comprises Bracknell Forest Council, Reading Borough Council, and Wokingham Borough Council.

The Berkshire (including South Bucks) Strategic Housing Market Assessment ('SHMA') (2016) [Footnote: Available online at: https://www.westberks.gov.uk/media/40949/Berkshire-inc-South-Bucks-Strategic-Housing-Market-Assessment/pdf/Berks_SHMA_Feb_2016.pdf?m=638103405174070000], published as part of the Council's evidence base, affirms the strong functional relationships exhibited between these local authority areas, in relation to where people live and work.

Recognising these functional relationships, the Western Berkshire HMA authorities have demonstrated a shared history of collaborative working in relation to housing matters and associated infrastructure, which included the preparation of a joint Statement of Common Ground ('SoCG') for the purposes of local plan-making.

Signed by each constituent authority in August 2021, the West of Berkshire Area SoCG [Footnote: Available online at: [https://www.westberks.gov.uk/media/53787/Duty-to-Cooperate](https://www.westberks.gov.uk/media/53787/Duty-to-Cooperate-Statement-January-2023/pdf/LPR_Interim_DtC_Statement_January_2023.pdf?m=638086137283470000)

-Statement-January-2023/pdf/LPR_Interim_DtC_Statement_

January_2023.pdf?m=638086137283470000] recognises that, in the first instance, each authority will seek to meet its own development needs in full. However, the SoCG acknowledges that there is a shortfall in planned residential development in Reading borough of 10 dpa, equating to 230 net new homes over the adopted plan period.

Consequently, it is recognised that there is currently a modest identified quantum of unmet need arising from within the Western Berkshire HMA. In seeking to address this unmet need, the SoCG recognises that this should, in principle, be met within the Western Berkshire area.

As such, Sovereign **supports** the Council's identification of additional headroom within the identified supply, which could be partially utilised to accommodate an appropriate proportion of the unmet need arising from Reading borough throughout the plan period.

In providing sufficient capacity within the headroom of supply in West Berkshire, Sovereign recommends that the Council seeks to maximise the development potential of the sites proposed to be allocated for residential development within the plan.

To this end, Sovereign recommends that the identified approximate capacity within proposed Policy RSA23: 'Land Adjoining The Haven, Kintbury' be revised to approximately 35 dwellings. As set out in Section 6 of these representations, the site is considered to be capable of delivering this quantum of development whilst being sensitively designed to conserve and enhance the special landscape character of the AONB.

Given that the identified unmet need arising within Reading is anticipated within the latter stages of the borough's adopted plan period, alongside the borough's commitment to review the adopted local plan by 2024, it is considered that the long term extent of unmet need arising from Reading remains unclear. Sovereign therefore supports the Council's identification of headroom within the supply, whilst not explicitly identifying a quantum of homes that specifically relate to providing for unmet need in Reading.

Affordable Housing Need in West Berkshire

West Berkshire faces a significant need for affordable housing over the plan period, as affirmed within the emerging local plan. The conclusions of the Berkshire (including South Bucks) SHMA (2016), updated in 2022 [Footnote 8: Available online at: <https://www.westberks.gov.uk/media/49801/Updated-Housing-Needs-Evidence-July->

[2022/pdf/West_Berkshire_Housing_Needs_Assessment_Update](#)

[_July_2022.pdf?m=638006715718270000](#)], further demonstrate the extent of this need in the plan area, finding that there is a need within West Berkshire for approximately 330 new affordable homes per annum up to 2039.

The identified need for affordable homes in West Berkshire, of 330 dwellings per annum, comprises approximately 64% of the overall identified housing need for the plan area, of 513 dwellings per annum. To deliver the number of affordable homes that are needed in West Berkshire, the plan would be required to identify a housing supply of, at least, 825 dwellings per annum (assuming a policy requirement of 40% affordable housing provision is applied), which represents +160% of the LHN figure.

Given that the identified annual need for affordable housing provision comprises approximately 64% of the overall annual local housing need, there is a clear case for accommodating further residential development, as far as is reasonably practicable, within the district to promote the delivery of greater affordable housing.

Furthermore, the Updated Housing Needs Evidence (2022) [Footnote 9: *Ibid*] illustrates, at Table 4.15, that a significant proportion (approximately 46%) of the district's total affordable housing need is required within the North Wessex Downs AONB Spatial Area, comprising 152 dpa out of the overall total of 330 dpa.

ONS datasets [Footnote 10: Source: House Price Statistics for Small Areas and Annual Survey of Hours and Earnings, ONS] confirm that the latest median housing affordability ratio (2021) for West Berkshire is 9.73 [Footnote 11: Median housing affordability ratio refers to the ratio of median price paid for residential property to the median workplace-based gross annual earnings for full-time workers]. This is up from a ratio of 5.1 in 2000 and 7.3 in 2010, which indicates that homes in West Berkshire have become markedly less affordable over time.

To support the long-term viability of services and amenities of the district's numerous Service Villages within the North Wessex Downs AONB Spatial Area, such as Kintbury, there is clearly a need to deliver new market and affordable homes in the village within the plan period. Sovereign therefore **supports** the allocation of Land Adjoining The Haven, which presents the most suitable opportunity in Kintbury to provide much-needed new homes.

DEVELOPMENT MANAGEMENT POLICIES

The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.

Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.

As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.

Policy SP12: Approach to Housing

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

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

CONCLUSION

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district, whilst recognising the vital role that modest growth provides to support medium and smaller-sized villages within the North Wessex Downs Area of Outstanding Natural Beauty.

Sovereign supports the Council's commitment to meeting housing needs in full and supports the Council's identification of a reasonable amount of headroom in the district's housing supply to ensure that local housing needs are met during the plan period.

However, Sovereign recommends that the Council seeks opportunities to maximise the development capacity of appropriate sites to ensure that the identified headroom is as robust as is reasonably practicable. Land adjoining The Haven, Kintbury, which is proposed to be allocated for the development of approximately 20 new homes under emerging Policy RSA23, presents such an opportunity. Sovereign considers that the approximate capacity allocated for the site could be higher, without detriment to the amenity of adjoining residents, with sufficient scrutiny to the design of the scheme and in considering greater benefits to the wider community. The provision of additional capacity could reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district.

Furthermore, Sovereign supports the proposed spatial strategy, which includes a modest amount of residential development within the North Wessex Downs AONB Spatial Area. The approach maintains the existing spatial strategy within the district and would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing. The proposed allocations have also been evidenced and justified through detailed analysis to ensure the high value of the AONB and any potential impacts are carefully considered.

	<p>Otherwise relatively unconstrained, the nature of the district's North Wessex Downs AONB Spatial Area, which includes the presence of a series of sustainable, small and mediumsized villages, provides that the area remains appropriate to accommodate a reasonable proportion of the district's identified housing need. Furthermore, to support the longer-term viability of these villages, it is critical that the Council supports opportunities to provide modest growth in appropriate locations.</p> <p>To this end, Sovereign supports the proposed allocation of Land adjoining The Haven, Kintbury, for residential development under emerging Policies SP15 and RSA23. Kintbury comprises a relatively unconstrained settlement that could accommodate a reasonable level of growth during the proposed plan period. Land adjoining The Haven is well-positioned to make a reasonable contribution to meeting the district's development needs in this location.</p> <p>The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities within Kintbury. Furthermore, the site benefits from good access to nearby main settlement areas via bus and rail links, including Newbury and Reading. There are no significant constraints to the development of the site for approximately 35 new homes which could not be resolved through detailed, sensitive design consideration.</p> <p>Sovereign is able to confirm that the site is available for development now, represents a suitable location for development, and that development of the site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The site is deliverable and should continue to be favourably regarded in relation to allocation for residential development within the emerging West Berkshire Local Plan.</p> <p>We look forward to continuing to work with West Berkshire District Council, Kintbury Parish Council, and the wider community to provide much-needed new housing in this rural community. We also look forward to exploring how the Land adjoining The Haven, Kintbury can contribute to the delivery of sustainable development and benefit the village, local infrastructure, and facilities.</p> <p>We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.</p> <p><i>See attached document for a full response <Boyer obo Sovereign_full rep></i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
<p>4. Proposed Changes</p>	<p>As such, the following amendment to the policy is recommended:</p> <p>ii) There should be no net losses from the existing stock of homes in West Berkshire. Existing homes should be retained in residential use (or replaced at least in equal numbers, normally on the proposed site), unless there is a reasoned justification in the form of a benefit to the wider community for a change of use. Developments should utilise opportunities to make better use of the existing housing stock.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven,</p>

	Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1533
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf Croudace Homes Combined Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>[See attached Combined Appendices for appendices. For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>Detailed Comments on the Evidence Base</p> <p>Croudace has reviewed the Council's evidence base prepared to inform the LPR and makes comments on specific elements, particularly where they support the site's allocation.</p> <p>Evidence Base Studies Relating to Site Selection</p> <p>Housing and Economic Land Availability Assessment (January 2023)</p> <p>Henwick Park is assessed in the HELAA under site reference CA12 'Land at Henwick Park, Bowling Green Road, Thatcham, RG18 3BY'. It is correctly identified as being adjacent to the settlement boundary, outside the AONB and available for the delivery of residential development.</p> <p>Table 3 provides a summary of the HELAA's conclusions on the site, with Croudace's response to the points made.</p> <p>We understand the HELAA's conclusion of the site's partial suitability and developability stems from the fact that at the 'Call for Sites' stage, the entirety of the red line boundary was originally submitted for consideration. However, Croudace can confirm that only the southern part of the site, equating to less than half (45%) of the site, is proposed for built development, whilst the northern part (55%) is set aside for POS and BNG (Appendix D). This has been derived from landscape studies and feedback on earlier planning applications which identified the 95m AOD (above ordnance datum) contour line as being the appropriate limit to development without causing landscape harm. This approach was found acceptable by the Council, Inspector and SoS at appeal (Appendix C).</p> <p>It is notable (and accurate) that no technical constraints are identified which would preclude the development of the southern part of the site for residential development. As Croudace is seeking only to deliver development in line with the conclusions of the HELAA (on the southern part of the site), it is contended that this part of the site (extending to 10.09 ha) is fully suitable, available, achievable, and therefore deliverable and developable.</p> <p>Croudace confirms that if the Council concludes that additional sites are required for housing, it can be confident that there are no site-specific reasons why the Land at Henwick Park should not be allocated for residential development.</p> <p>West Berkshire Strategic Vision 2050 (November 2022)</p> <p>The West Berkshire Strategic Vision 2050 looks to guide long term, sustainable growth in West Berkshire setting out how Newbury and Thatcham can achieve a zero carbon future whilst meeting its objectives for key strategic infrastructure requirements.</p> <p>Croudace notes that Figure 5 of the document (extract above) specifically identifies Henwick Park as an 'area identified for future growth'. Croudace firmly agrees with the assessment made.</p> <p>In addition, Figure 6 (extract above) sets out a series of key benefits of directing growth to areas including Henwick Parks: – "The growth areas identified are parts of the district with the least constraints and influences";</p> <ul style="list-style-type: none"> – "They benefit from their co-location to existing settlements and existing strategic infrastructure"; – "They have the opportunity to graft onto the existing settlements and contribute to the vitality of the existing town centre"; – "They can be well connected to both existing settlements and interconnected within themselves";

– “The existing topography adds value to some sites by providing passive solar gain; as they form part of the southern slope of the North Wessex Downs”.

Furthermore, Figure 11 (extract below) confirms that Henwick Park is a ‘Potential Area of Search for Future Growth’. Again, on the following page of the document, the site is shown to benefit from safe and convenient walking distances to local centres and/or shopping areas.

It is clear, based on the contents of the West Berkshire Strategic Vision 2050 that the Council’s evidence base supports Croudace’s assessment that Henwick Park constitutes a logical and sustainable location for growth, as confirmed through these representations. 4.12 The Council can be confident that there are no site-specific reasons why the Land at Henwick Park should not be allocated for residential development.

Evidence Base Studies Relating to Housing Need Berkshire (including South Bucks) Strategic Housing Market Assessment (February 2016)

Croudace has reviewed the Strategic Housing Market Assessment (‘SHMA’) with interest to verify that the mix of housing proposed at Henwick Park is in accordance with the needs of West Berkshire. This is despite its somewhat dated nature and the fact it has been superseded by the Updated Housing Needs Evidence (‘HNAU’) (July 2022).

Firstly, regarding the housing needs of older people, it found that population projections advise that the proportion of over 65s to be resident in West Berkshire by 2036 was due to increase by 76% – a stark increase, which emphasises the requirement to consider the housing needs of the ever-aging population.

The SHMA outlines that many older residents have built up equity in their properties and may look to downsize to release equity to support their retirement. However, they often want to retain housing with space for relatives to stay, or to remain within their chosen area close to family. It is therefore important to consider the creation of specialised housing close to areas where the elderly population is, or is predicted to be, high.

Table 116 of the SHMA sets out the projected need for specialist housing for older people, and outlines that in West Berkshire, there is a net need for 2,239 units between the period 2013-2036. This therefore demonstrates an acute need to deliver additional specialist housing within West Berkshire.

Secondly, with regard to affordable housing, the SHMA confirms that around three fifths of households with a need for new housing are likely to have insufficient income to afford market housing. Equally, approximately 34% of newly forming households would be unable to purchase market housing without some form of subsidy. Table 81 of the SHMA outlines a net affordable housing need for West Berkshire of 189 dpa, whilst paragraph 6.103 recognises that the private rented sector has taken on an increasing role in providing housing for households who require financial support to meet housing needs.

Thirdly, in terms of the required size of homes needed going forward, the SHMA outlines that the Western Berkshire HMA is likely to require mostly 3-bedroom homes (42.3%), supplemented with a lower proportion of 2-bedroom homes (28.9%), 4+ bedroom homes (19.7%) and a small amount of 1-bedroom homes (9.1%). Croudace considers this supports a broad mix of dwelling sizes.

Finally, the SHMA assesses the need for self-build plots, acknowledging that the lack of land is one of the biggest barriers to self-build projects. As of 2015, it was identified that West Berkshire had only five available plots for selfbuild and the HMA as a whole had only 14, demonstrating a clear need for this type of housing, which is anticipated to have grown.

West Berkshire Housing Needs Assessment Update (July 2022)

The Housing Needs Assessment Update (‘HNAU’) provides more up to date information regarding the specific housing needs of West Berkshire, building on the work carried out to inform the SHMA in 2016. It claims that there are no circumstances (relating to economic growth, growth funding, strategic infrastructure requirements or affordable housing need) that indicate that actual housing need is higher than the standard method indicates (513 dwellings per annum (‘dpa’)).

The HNAU outlines a need for 330 dpa affordable and social rented to 2039 and an additional need for 367 dpa for affordable home ownership – a total of 697 dpa, which far outstrips the standard method figure. However, the potential for re-sales of market homes could be enough to provide a significant additional supply of affordable homes for ownership. It is only through new development that new affordable and social rented dwellings can be provided, therefore placing a greater emphasis on the need for the delivery of affordable rented dwellings through new development.

Specialist housing needs are also assessed, with the HNAU outlining that the number of older people is expected to grow by 43% over the period to 2039. In terms of housing needs, there is a stark shortage of homes for wheelchair users, with a need for 1,200 homes designed to technical standard M4(3) wheelchair user dwellings.

The HNAU suggests the focus of new market housing should be on 2-3 bedroom properties, whereas affordable homes for ownership and or rent are needed as 1-3 bedroom homes, although the HNAU does suggest that policy requirements remain flexible.

Housing Background Paper (January 2023)

The Housing Background Paper explains the background to the housing policies contained within the LPR, including in relation to the housing requirement, affordable housing and strategic site allocations, as well as non-strategic site allocations and development control policies.

The Housing Background Paper contains the detailed Housing Trajectory which provides the supporting calculations to the trajectory contained at Appendix 8 of the LPR. However, as we explore in Section 6 of these representations, we have significant concerns with the underlying assumptions and conclusions and therefore we dispute the robustness of the housing trajectory figures provided, which undermines the soundness of the plan.

Detailed Comments on the Housing Requirement

Overall, Croudace is compelled to object to the proposed approach the Council is taking to its housing requirement on the grounds that it is unambitious and fails to meet unmet needs from neighbouring authorities. As a very minimum, the requirement needs to look ahead over a minimum 15-year plan period from adoption. **Approach to Housing Delivery (Draft Policy SP12)**

Draft Policy SP12 establishes that the housing requirement for West Berkshire across the plan period (2022-2039) will be between 8,721 and 9,146, equating to between 513 to 538 dpa.

Paragraph 61 of the NPPF requires strategic policies to be informed by a local housing need ('LHN') assessment, conducted using the standard method in national planning guidance.

The 'housing and economic needs assessment' section of PPG explains that the standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth (at present using the 2014-based Household Projections) plus an uplift for affordability based on data from the Office of National Statistics ('ONS') (at present, data from April 2022). 5.5 The largest 20 cities and urban areas in England are then subject to a further 35% increase (the 'urban centres uplift'), reflecting Government objectives to place new housing in existing urban areas and encourage the redevelopment of brownfield land. Whilst West Berkshire itself is not subject to the urban centres uplift, the neighbouring authority of Reading is, which has implications on West Berkshire, as the two authorities fall within the Western Berkshire Housing Market Area ('HMA'). 5.6 It is important to emphasise that the Government considers the standard method calculation, and where relevant, the urban centres uplift, to be the minimum LHN for an area.

In the first instance, Croudace is therefore encouraged to see that the Council (in the supporting text to draft Policy SP12), confirms that the LHN is derived from the standard method figure of 513 dpa, which represents the latest figure following the release of the aforementioned ONS data in April 2022, even though that figure represents less housing growth than required by the adopted Core Strategy (525 dpa).

However, Croudace does not consider that the inclusion of an additional 5% buffer (538 dpa), whilst higher than the Core Strategy figure, is sufficiently ambitious enough to align with the Government's objective to significantly boost the supply of homes, albeit the Council clarifies this does not constitute a 'cap'. Croudace suggests that the inclusion of an additional 15% buffer would be more reasonable and would allow for much more flexibility in the plan-making process.

Unmet Need from Neighbouring Authorities

Paragraphs 24 to 27 of the NPPF sets out a DtC on strategic matters that cross administrative boundaries. The importance of effective and ongoing joint working is deemed as being integral to the production of a 'positively prepared' and 'justified' strategy. Joint working is encouraged to help determine whether development meet needs that cannot be met wholly within a particular plan area could be met elsewhere.

Paragraph 6.4 of the LPR outlines that West Berkshire has a strong functional relationship with Wokingham Borough, Reading Borough and Bracknell Forest Councils which together form the Western Berkshire HMA, and confirms that the authorities work collaboratively on housing matters.

The LPR identifies that Reading Borough Council has a shortfall of 230 dwellings, based on the findings of the Berkshire SHMA (February 2016), which is anticipated to arise in the latter part of its current Local Plan period. Through ongoing joint working, the local authorities mentioned at paragraph 3.9 recognise that Reading's unmet need should be met within the authorities working together.

The Statement of Common Ground ('SoCG') that has been agreed by the Western Berkshire HMA authorities recognises Reading's unmet need and the principle that this should be met in the West of Berkshire area. The NPPF is clear that unmet needs must be taken into account when establishing the housing requirement. The emerging LPR therefore represented the optimum time to address Reading's shortfall and accommodate the small amount of unmet need within West Berkshire, but Croudace is concerned that the opportunity has been missed.

By way of context, the SHMA and subsequently the Reading Borough Local Plan (adopted November 2019) set the objectively assessed need ('OAN') figure for Reading as 699 dpa. However, Reading's LHN as calculated by the standard method is currently 907 dpa, which represents an increase of 208 dpa or 30%. Therefore, in principle, the actual shortfall could be significantly higher than 230 dwellings.

The Reading Borough Local Plan at paragraph 4.4.3 explains the shortfall is due to the fact that "Reading is a very tightly defined urban area, and sites for new development are limited. The undeveloped land that does exist is mainly either in the functional floodplain or is important public open space".

These constraints are somewhat immovable and any increase in the housing requirement (such as through the standard method) for Reading Borough will lead to an increased shortfall that will need to be met elsewhere in the Western Berkshire HMA.

Whilst Reading has committed to a review of its Local Plan by 2024, at which point it will be required to adjust its housing requirement in line with the LHN in effect at the time, Croudace urges the Council to be more proactive by seeking to accommodate a proportion of Reading's unmet needs within its housing requirement and consequently to allocate additional sites to ensure such requirements are met. By not seeking to do so at this stage, Croudace considers that the LPR is not 'positively prepared'.

Naturally, Henwick Park, would be extremely well placed to meet the shortfall arising from Reading, as we demonstrate earlier in these representations.

Detailed Comments on Housing Delivery

Croudace is concerned that housing delivery is constrained in several ways by the LPR.

As we explore below, Croudace is concerned there may not be a deliverable 5YHLS upon adoption and equally has significant doubts concerning the longer-term developable supply. Greater flexibility is therefore required to ensure that the wide range of needs across the District are suitably met across the plan period, in order to represent a 'positively prepared' or 'effective' strategy.

Meeting the Housing Requirement

Firstly, against draft Policy SP12's housing requirement of 9,146 new dwellings (538 dpa), Table 4 outlines how the Council envisages this will be met across a range of supply components.

Table 4 demonstrates that even with the Council's 'best estimates' of delivery, the identified housing land supply together with proposed LPR allocations are not sufficient to meet the housing requirement. There is, by the Council's own admission, a shortfall of 7 units over the plan period to 2039 (based on 538 dpa).

That precarious position has been reached even before:

1 In terms of the requirement:

- The plan period is increased by at least one year, to account for likely delays in the plan's adoption;
- A proportion of Reading's unmet needs are incorporated into West Berkshire's housing requirement;
- The housing requirement is increased to help ensure affordable and other needs (such as for older people or those wishing to build or commission their own home) are met; - A more ambitious buffer of 15% is applied to provide additional flexibility.

1 In terms of housing supply:

- The Council's historic projections have been overly optimistic by 11% on average (Table 5);
- Our detailed conclusions on the 5YHLS have been factored in;
- Conclusions on the appropriateness of the proposed allocations and their ability to deliver completions at the point envisaged (or indeed at all) has been properly tested through the Examination process.

As mentioned above, Croudace has undertaken a comparison of actual completions witnessed in West Berkshire against historic forecasts. The results in Table 5 reveal that over a 11-year period, the Council's predictions have overestimated the actual completions delivered on-site by around 11% on average.

There is therefore less certainty that West Berkshire's full needs will be met over the plan period. As such, this undermines the soundness of the plan, at least from a 'positively prepared' and 'effective' perspective. This is fundamental and goes to the heart of the plan's soundness.

Five Year Housing Land Supply

Croudace has undertaken a detailed assessment of the immediate five-year (i.e. deliverable) housing land supply, focusing on the deliverability of the sites or allowances included to establish if they meet the requirements of NPPF paragraph 74, the definition within the Glossary and guidance in PPG.

It has reviewed sites within the following categories:

- Allocated sites:
 - Core Strategy allocations;
 - HSA DPD and Neighbourhood Plan allocations.
- Non-allocated (large/medium) sites:
 - Sites with planning permission (10+ units);
 - Sites with prior approval (10+ units).
- Non-allocated (small) sites:
 - Sites with planning permission (<10 units)
 - Sites with prior approval (<10 units).
- Allowances:
 - Small site windfall allowance
- Communal accommodation

In addition there is a further component which has not been allowed for- an allowance for future demolition and other losses, albeit this has a negative effect in supply figures.

Based on 538 dpa over the five-year period 2022 to 2027, Croudace's assessment finds there to be a supply of only **4.9 years**. In addition, looking at the subsequent five-year period 2023 to 2028, the position worsens further to **3.8 years**. 6.12 Croudace's highlights that its findings are much more realistic and robust than the Council's forecasts. They highlight that there is a real risk that the Plan would not be able to demonstrate a 5YHLS upon adoption. As such, additional new non-strategic, unconstrained sites without requiring significant new infrastructure and which can deliver early in the plan period should be allocated. Croudace considers that the Land at Henwick Park is an ideal candidate site for consideration.

Longer-term Housing Land Supply

Croudace has also undertaken an assessment of the longer-term (i.e. developable) housing land supply.

Table 2 of the LPR ("Housing Supply at 31 March 2022") outlines a claimed supply of 7,337 dwellings. By offsetting that total against the housing requirement of 9,146, the Council suggests that sites sufficient to accommodate a further 1,809 dwellings need to be found.

The LPR proposes to allocate land for an additional 1,720 dwellings. This leaves a shortfall of 89 dwellings, of which 80 dwellings are proposed to be delegated to come forward through new Neighbourhood Plan allocations.

Croudace raises concerns regarding the Council's claimed supply. Our detailed analysis results in a reduction to the Council's assumed supply of 560 dwellings across the plan period.

The results of our assessment are summarised in Table 6.

Existing Commitments

Croudace's assessment of the Council's claimed supply has appraised the individual sites which make up the element of supply entitled 'Existing Commitments', from which 1,958 units are expected to be delivered.

The analysis confirms that the following sites should be removed from the supply as they are not considered to be deliverable or developable in line with the tests set out within national policy:

– 1 West Street, Newbury (20 units) – the Council's assessment of 5YHLS confirms that the site's planning permission expired in September 2022;

– Bloor Homes, Southern River View House, Newbury Business Park (12 units) – Croudace's assessment of this site as part of the 5YHLS Assessment deduced that this building was still being marketed for office use, with no developer identified;

– 6 units should be removed from the supply at the existing commitment 'Market Street redevelopment, Newbury' due to over-counting of permissions/completions.

As such, Croudace confirms that **38 units should be removed from the supply.**

Windfall

In terms of windfall, the Council makes an allowance for 1,949 units to come forward from Year 4 of the Plan onwards. This equates to 129 dwellings in Year 4, and 140 dpa thereafter.

Paragraph 6.20 of the LPR states that the windfall allowance does not include sites of 10 or more dwellings, and therefore Croudace has had regard to historic delivery rates to make a judgement as to whether the allowance of 140 dpa is in line with the requirements of the NPPF at paragraph 71, which requires compelling evidence that windfalls provide a reliable source of supply.

As such, Croudace has drawn upon Table 3.1 of the Council's 5YHLS Statement, which breaks down net windfall completions since 2006/07.

Looking solely at sites less than 10 units, the average annual windfall delivery is 141 units, although Croudace considers this to be skewed by a handful of years where performance is significantly improved. In reality, in only five years of the 16-year monitoring period has windfall delivery on small sites reached 140 dpa. In addition, windfall delivery from small non-allocated sites generally has a negative trend as indicated within Figure 13.

Croudace urges the Council to look again at historic windfall delivery rates in a manner that is not influenced so heavily by well performing years. This is pertinent especially in light of current economic conditions, the price of building materials, supply chain issues, shortages of labour and increasing interest rates etc. – which all reduce the likelihood of SME builders meeting the 140 dpa 'target'.

These issues suggest that historic delivery rates may not continue at the same rate into the future and therefore the Council must take a broader look at windfalls, particularly given small sites within the urban area are a finite resource which dwindles over time, as demonstrated by the trend-line at Figure 13.

Instead, Croudace considers that a 'median' figure (rather than the 'mean') may be more appropriate. The median figure in this case would result in an annual windfall allowance of 126 units. Applied over the same period from Year 4 (2025/26) onwards, this would generate a more modest windfall allowance of 1,764 dwellings.

Croudace therefore applies a **deduction of 185 units from the Council's assumed supply for windfall development.**

Even with this reduction, approximately 20% of the Council's supply would still be comprised of windfalls, which is a significant proportion.

Clearly, Croudace does not consider that the reliance on windfalls is a 'positively prepared' or 'effective' strategy. Instead, the Council should seek to allocate a sufficient quantum of additional sites to provide certainty that the housing requirement (even if it were to remain at 538 dpa) would be delivered. Croudace would like to highlight that the Land at Henwick Park is an unconstrained site which could give greater certainty and therefore credibility to the plan.

Existing Allocations Carried Forward / Effects of the Housing Trajectory

The LPR proposes to carry forward 18 existing allocations from the Core Strategy (adopted July 2012) and the HSA DPD (adopted May 2017). These sites are spread across the three spatial areas identified at draft Policy SP1.

Croudace notes that a number of these sites are affected by constraints which are likely to impede development either in totality, or at least through a delayed start on site or lower rate of delivery. For example, Five allocations to be carried forward are located in areas which are constrained by nutrient neutrality as noted in Table 8.

As explained above, Croudace therefore considers that the reliance on five existing allocations within areas constrained by nutrient neutrality to be a fundamental flaw in the plan-making process. These sites are unlikely to be able to deliver residential development within the first five years of the plan period, owing to a lack of available mitigation schemes to offset the likely impacts on nutrients.

Appendix 8 of the LPR and Appendix 2 of the Housing Background Paper set out the anticipated Housing Trajectory across the plan period. The trajectory identifies that only 27 units from the sites listed at Table 8 are expected to deliver units within the first five years of the plan period – i.e. those with the benefit of full planning permission. 6.79 This emphasises the difficulty the Council may find itself in as regards the 5YHLS, by relying upon existing allocations which cannot yet deliver housing.

In Croudace's view, it is not a 'positively prepared', 'justified' or 'effective' strategy to carry forward allocations on sites where there remain such uncertainties. It therefore recommends that allocations RSA2, RSA14, RSA15 and RSA21 are removed from the LPR and alternative land be found to accommodate the 163 units lost as a result.

Adding Sufficient Flexibility

Overall, Croudace considers there to be an inherent lack of flexibility built into the LPR, which raises concerns that it is not an 'effective' strategy:

- 1 The LPR should allocate a sufficient quantity of smaller, deliverable sites (such as Henwick Park for development immediately); and

	<p>2 The LPR should look to allocate a reserve supply of sites (i.e. 'Plan B' sites) if the projected housing land supply does not materialise as predicted.</p> <p>As touched upon earlier, large strategic sites can take many years to assemble (e.g. Sandleford Park) and sometimes some do not materialise whatsoever. For example, there may be uncertainty surrounding such issues as the need to overcome constraints relating to land ownership, agreeing masterplans, securing planning consent, agreeing S106 agreements, discharging conditions and funding and constructing new infrastructure etc. It can therefore take a significant period of time for strategic sites to yield completions, which should not be underestimated.</p> <p>Croudace urges the Council to allocate a range of unconstrained, smaller, less strategic sites that can complement those strategic allocations in helping to meet housing needs. Deliverable sites such as Henwick Park can help to boost housing delivery in the short term to plug the gap in delivery before strategic sites begin to deliver housing.</p> <p>We believe the Council should also be requested to consider allocating a stock of reserve or 'Plan B' sites, providing an additional buffer of housing land within the plan period. Such land could be released under specific circumstances (such as a lack of 5YHLS or failing the Housing Delivery Test, or where accommodating unmet needs from Reading, for example). This would create inherent flexibility in the LPR thereby avoiding lengthy delays associated with undertaking another Local Plan Review or a more comprehensive update.</p> <p>Alternatively, a policy allowing the development of land outside of settlement boundaries where certain circumstances arise (such as no five-year housing land supply, as per Fareham at Appendices H and I) or constraints-based criteria are met could be considered. Sites with no constraints could then provide additional flexibility.</p> <p>Finally, flexibility could be written into the plan by following a similar approach to South Northamptonshire (Appendix J), where certain types of specialist housing are supported outside of settlement boundaries subject to the meeting of several criteria and a clear evidencing of need and lack of available alternative sites.</p> <p>Conclusion</p> <p>Following a review of the LPR and the associated evidence base, Croudace firmly considers that the Plan as currently drafted is not legally compliant and cannot be found 'sound' in line with the tests outlined at paragraph 35 of the NPPF.</p> <p>Fundamental changes are required in order to ensure that the LPR is 'positively prepared', 'justified', 'effective' and 'consistent with national policy', as well as being legally compliant.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Adoption of a more ambitious approach to plan-making by increasing the housing requirement – the adoption of a mere 5% buffer over and above the LHN figure is unambitious, constricting and inconsistent with all tests of soundness. Croudace considers that the housing requirement should be higher to provide greater flexibility and surety that housing needs can be delivered across the plan period. In addition, an increased housing requirement to assist Reading in meeting its unmet needs, ensuring the delivery of affordable, specialist and self and custom-build housing and reflecting a necessary increase to the plan period would make for a more appropriate strategy.</p> <p>Making a more realistic assessment of housing land supply– Croudace calls on the Council to make a more accurate, realistic and therefore 'effective' assessment of housing land supply, reducing reliance on windfall development and removing allocations which are not deliverable. This would have the effect of reducing the supply of housing to a level which would mean the Council would need to allocate additional land for housing on readily available sites.</p> <p>The identification of land to provide inherent flexibility for the future – if not making sufficient allocations at this stage, the Council should look to provide sufficient flexibility in the plan to adapt to potential changing circumstances in the future by identifying reserve (i.e. 'Plan B') sites which can be brought forward for development in specific circumstances, or by looking to support development outside of settlement boundaries in specific circumstances. This would be a much more 'positively prepared' and 'effective' strategy.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	<p>Yes</p>

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1751
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	Boyer (Darcliffe) (Sullham hill) full rep.pdf Boyer (Darcliffe) (Little Heath rd) full rep.pdf
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<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>EXECUTIVE SUMMARY</p> <p>Boyer have prepared these representations on behalf of Darcliffe Homes Ltd ('Darcliffe'), in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039) ('the emerging plan').</p> <p>The purpose of these representations is to assist the Council in refining an approach that is consistent with both national planning policy and the tests of soundness. To this end, the representations provide general support to the overall objectives of the emerging plan, but provide detailed commentary in relation to aspects where Darcliffe has concerns with regard to aspects of the emerging plan's soundness.</p> <p>Darcliffe supports the Council's principal objectives, which include seeking to meet the District's local housing needs. However, Darcliffe has concerns in relation to certain aspects of the plan, which we encourage the Council to consider amending prior to submission for examination in public.</p> <p>Darcliffe recommends the plan is amended in relation to: the duty to co-operate; increasing the level of headroom provided in the identified housing requirement (to both improve the robustness of the planned supply and to deliver additional much-needed affordable housing); allocating a specified amount of development to accommodate unmet need arising in Reading; updating the proposed plan period to include an additional year; and ensuring a robust rolling five-year housing land supply position throughout the plan period, reducing reliance on both the windfall allowance and on larger strategic site allocations that are likely to only begin delivering in the later extent of the plan period.</p> <p>Darcliffe considers that these concerns could and should be resolved with the introduction of an allocation for residential development, of approximately 322 homes, at Land west of Little Heath Road, Reading (the site).</p> <p>INTRODUCTION</p> <p>Policy Context</p> <p>West Berkshire District Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council adopted the Housing Site Allocations Development Plan Document in May 2017: which sought to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the District therefore sets out the spatial strategy to meet development needs up to 2026, and provides a series of site allocations and planning policies that seek to deliver that strategy.</p> <p>To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.</p> <p>The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) ('the emerging plan'), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The Draft Plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption. The Council's Local Development Scheme ('LDS') anticipates its adoption in September 2024.</p> <p>Darcliffe fully supports the Council's commitment to review the existing development plan through this process. However, it is considered that there are several aspects of the emerging plan and its evidence-base, which would benefit from further consideration. These areas are detailed within these representations. We encourage the council to address the concerns we've identified to ensure the emerging plan is capable of being found sound.</p> <p>To assist in resolving our concerns, Darcliffe are promoting the allocation of Land west of Little Heath Road, Reading for the development of approximately 322 new homes, including 129 much needed affordable homes, on-site public open space, SuDS, landscaping, biodiversity enhancements, multiple vehicular access points, pedestrian and cycle links, and associated infrastructure.</p>

THE SCALE OF HOUSING NEED

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

- the scale of housing need in West Berkshire,
- the need for affordable housing in West Berkshire, and
- unmet need arising outside of West Berkshire & the Duty-to-Cooperate.

The Scale of Housing Need in West Berkshire

Calculating Housing Need

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

The National Planning Policy Framework ('NPPF') [Footnote 2: Available online at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf] confirms, at paragraph 61, that:

"...to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach".

The Government's Standard Method for calculating housing need is set out clearly in Planning Practice Guidance ('PPG') [Footnote 3: Available online at:

<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#identifying-the-need-for-different-types-of-housing>]. Proposed Policy SP12 clarifies that the appropriate LHN figure for West Berkshire comprises 513 dwellings per annum ('dpa'), as derived using the Government's Standard Method.

Furthermore, no exceptional circumstances have been identified that apply to West Berkshire which justify the use of an alternative starting position approach to the Government's Standard Method. Darcliffe **agrees** there are no exceptional circumstances that justify the application of an alternative assessment of housing need that would result in an identified need below that of the Standard Method, in accordance with PPG.

Darcliffe **supports** the Council's use of the Government's Standard Method to derive a minimum housing need figure for the District area. However, as noted within the emerging local plan, it remains pertinent that the LHN figure represents the minimum identified housing need. It should not be considered to represent a maximum quantum of development to be provided.

PPG clarifies there are various circumstances in which it may be appropriate for an authority to plan for a higher number of homes than indicated through the LHN Standard Method calculation. Such circumstances include, but are by no means limited to, situations in which an authority has agreed *"...to take on unmet need from neighbouring authorities, as set out in a statement of common ground"* [Footnote 4: *Ibid.* PPG Paragraph: 010 Reference ID: 2a-010-20201216].

Expressing the Housing Requirement

Darcliffe notes it is common practice, indeed best practice, for Local Planning Authorities ('LPAs') to identify a 'buffer' in the identified housing requirement, to ensure at least the minimum local housing needs of the area are more likely to be delivered in practice. Typically, this is represented in the provision of an amount of headroom in the supply over the minimum target, to account for the practical realities that inhibit sites being delivered as anticipated throughout the plan period.

To this end, the Council has identified an approach to its identified housing requirement that reflects a range, between the LHN minimum of 513 dpa to 538 dpa. Within the supporting text to Policy SP12, the Council clarifies that the housing target of 513 dpa represents a minimum housing delivery figure to be achieved, and therefore that it does not represent a cap, or 'maximum' amount. Darcliffe welcome the Council's recognition that the LHN figure of 513 dpa should be exceeded where possible.

Further, the Council assert that the application of a range within the identified housing requirement of an authority's area represents common practice. However, Darcliffe contends that this is not the case. Indeed, the expression of the housing requirement as a range is considered to introduce unnecessary confusion into the planning process and is therefore considered to be inconsistent with the NPPF.

Paragraph 16 of the NPPF requires that local plans should '...contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. The expression of a housing requirement that consists of a range between two targets is unnecessarily opaque and introduces entirely unnecessary uncertainty with regard to how the Council's annual housing requirement will be measured and monitored.

For example, the use of a range introduces uncertainty in relation to how the 5% buffer, as required by paragraph 74 of the NPPF, would be applied in considering the Council's Five- Year Housing Land Supply position ('5YHLS').

Given these concerns, Darcliffe recommends the Council seeks to identify a single housing requirement figure, which reflects the LHN figure, plus an appropriate buffer, in the identified housing requirement, that is sufficient to ensure that the District's minimum housing needs will be delivered in practice, providing flexibility in the supply of homes and choice and competition in the market for land.

The Appropriate Buffer in the Housing Requirement

Darcliffe **supports** the Council's recognition that, to be *effective*, the emerging plan must identify a housing requirement, and accompanying housing land supply, which includes an appropriate buffer over the minimum LHN figure of 513 dpa. However, Darcliffe contends the provision of just a 5% buffer over the LHN figure is insufficient to effectively ensure that the District's minimum local housing needs will be delivered in practice.

Research undertaken by Lichfields in 2015 indicated that approximately 10-20% of all planning permissions granted nationally were not ultimately implemented (excluding re-plans) [Footnote 5: Lichfields (2021) Taking Stock: The geography of housing need, permissions and completions. Available online at: <https://lichfields.uk/media/6453/>

[taking-stock-the-geography-of-housing-need-permissions-and-completions_may21.pdf](#)]. Given the typical detractors from the implementation of planning permissions; including market fluctuations, delays in the planning process, legal restrictions, complications with the discharge of conditions, *et al.*, it is entirely reasonable to expect that a certain proportion of the allocated housing supply over a fifteen-year period would either not come forward as the Council's trajectory anticipates, or not be delivered at all.

Consequently, to be *effective*, the emerging plan must seek to identify a buffer of at least 10% above the identified minimum local housing need figure. This is considered to be necessary to ensure that those minimum housing needs can be effectively delivered, in practice, over the length of the emerging plan period.

As such, Darcliffe contends that the Council should amend Policy SP12 accordingly, to reflect a housing requirement figure of 564 dwellings per annum. This reflects the identified minimum housing needs as derived through the Standard Method, plus a 10% buffer to ensure that these needs are delivered in practice. This represents an increase in the identified housing requirement by an additional 442 dwellings over the plan period.

To assist the Council in providing an *effective* and robust housing land supply, Darcliffe recommends that the Land west of Little Heath Road, Reading is allocated for the delivery of approximately 322 new homes. In isolation, this site would provide approximately 3.8% of the district's total identified housing requirement over the plan period, which would help to ensure that the district's housing needs would be met effectively and in a sustainable location.

Affordable Housing Need in West Berkshire

West Berkshire faces a significant need for affordable housing over the plan period, as affirmed within the emerging local plan. The conclusions of the Berkshire (including South Bucks) SHMA (2016), updated in 2022 [Footnote 6: Available online

at: https://www.westberks.gov.uk/media/53425/Local-Development-Scheme-January-2023/pdf/Local_Development_Scheme_Jan_2023_clean.pdf?m=638097176540170000], further demonstrate the extent of this need in the plan area, finding there is a need within West Berkshire for approximately 330 new affordable homes per annum up to 2039.

The identified need for affordable homes in West Berkshire, of 330 dwellings per annum, comprises approximately 64% of the overall identified housing need for the plan area, of 513 dwellings per annum. To deliver the number of affordable homes needed in West Berkshire, the Plan would be required to identify a housing supply of, at least, 825 dwellings per annum (assuming a policy requirement of 40% affordable housing provision is applied), which represents +160% of the LHN figure.

Given that the identified annual need for affordable housing provision comprises approximately 64% of the overall annual local housing need, there is a clear case for accommodating further residential development, as far as is reasonably practicable, within the District, to promote the delivery of greater affordable housing.

Furthermore, the Updated Housing Needs Evidence (2022) [Footnote 7: *Ibid*] illustrates, at Table 4.15, that a significant proportion (approximately 46%) of the District's total affordable housing need is required within the North Wessex Downs AONB Spatial Area, comprising 152 dpa out of the overall total of 330 dpa.

ONS datasets [Footnote 8: Source: House Price Statistics for Small Areas and Annual Survey of Hours and Earnings, ONS] confirm that the latest median housing affordability ratio (2021) for West Berkshire is 9.73 [Footnote 9: Median housing affordability ratio refers to the ratio of median price paid for residential property to the median workplace-based gross annual earnings for full-time workers]. This means that the median house prices in the District are almost 10 times that of median workplace-based earnings. This is up from a ratio of 5.1 in 2000 and 7.3 in 2010, which indicates that homes in West Berkshire have become markedly less affordable over time.

To support the long-term viability of the services and amenities of the District's Eastern Urban Area, such as Tilehurst and the other western suburbs of Reading, there is clearly a need to deliver new market and affordable homes in the area within the plan period. The area comprises the District's highest order settlement and as such represents the most sustainable location to accommodate new development in the District.

Given the principal mechanism for the delivery of affordable homes is through the allocation of market housing there is justification for adopting a higher housing requirement, we therefore encourage the Council to consider allocating both Site A and Site B to assist in meeting the identified need for affordable housing in the District. Given a policy compliant mix of homes, the sites are together capable of delivering approximately 32 new much-needed affordable homes.

Policy SP12: Approach to Housing

In accordance with the discussion set out previously, Darcliffe recommends that the housing requirement is clearly expressed as a single value, which includes at least a 10% buffer over the Local Housing Need figure. Furthermore, Darcliffe recommends that Policy SP12 is amended to clarify a specific contribution to meeting the identified unmet need arising from Reading.

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

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

CONCLUSION

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district, whilst recognising the vital role that modest growth within the North Wessex Downs Area of Outstanding Natural Beauty provides to the longer-term viability of those settlement locations contained within it.

To this extent, Darcliffe **supports** the Council’s principal objectives; which include meeting the district’s local housing needs in full, and directing required development toward the most sustainable locations within the district. However, Darcliffe has concerns in relation to certain aspects of the plan, which we encourage the Council to consider amending prior to submission for examination in public. These include: increasing the level of headroom provided in the identified housing requirement, allocating a specified amount of development to accommodate unmet need arising in Reading, and updating the proposed plan period to include an additional year.

In meeting the district’s identified housing needs, Darcliffe recommends the Council reconsider the omission of an allocation for residential development at the Land west of Little Heath Road, Reading. Darcliffe considers that the site could accommodate approximately 322 new dwellings, providing a policy-compliant development in one of the most sustainable locations in the district.

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

- * Yes
- * No

Please give reasons for your answer

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

Unmet Need Arising Outside of West Berkshire

The Government’s Standard Method calculation does not take account of unmet need arising from outside the authority’s area. However, as noted within the emerging plan, West Berkshire District falls within the Western Berkshire Housing Market Area (‘HMA’). Which also comprises Bracknell Forest, Reading Borough, and Wokingham Borough Councils administrative areas.

The Berkshire (including South Bucks) Strategic Housing Market Assessment (‘SHMA’) (2016) [Footnote 10: Available online at: https://www.westberks.gov.uk/media/40949/Berkshire-inc-South-Bucks-Strategic-Housing-Market-Assessment/pdf/Berks_SHMA_Feb_2016.pdf?m=638103405174070000], published as part of the Council’s evidence base, affirms the strong functional relationships exhibited between these local authority areas - in relation to where people live and work. Recognising this, the Western Berkshire HMA authorities have sought to demonstrate a shared history of collaborative working in relation to housing matters and associated infrastructure, which included the preparation of a joint Statement of Common Ground (‘SoCG’) for the purposes of local plan-making.

Signed by each constituent authority in August 2021, the West of Berkshire Area SoCG [Footnote 11: Available online at: https://www.westberks.gov.uk/media/53787/Duty-to-Cooperate-Statement-January-2023/pdf/LPR_Interim_DtC_Statement_January_2023.pdf?m=638086137283470000] recognises that, in the first instance, each authority will seek to meet its own development needs in full. However, the SoCG acknowledges that there is a shortfall in planned residential development in Reading borough of 10 dpa throughout their plan period, equating to a total of 230 net new homes.

Consequently, the authorities have recognised that there is currently a modest identified and agreed-upon quantum of unmet need arising from within the Western Berkshire HMA. In seeking to address this unmet need, the SoCG recognises that this should, in principle, be met within the Western Berkshire area. Given the relatively modest level of unmet need, Darcliffe expect that an appropriate contribution should be accommodated within West Berkshire district toward meeting some, if not all, of Reading’s unmet need.

The Bracknell Forest Local Plan has recently been subject to examination in public and has not included any additional supply to address the shortfall in Reading. As such, it falls to either Wokingham or West Berkshire to include it within their housing requirement.

Planning Practice Guidance (‘PPG’) states that “Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates...”. Darcliffe maintains therefore that simply pushing consideration of Reading’s unmet need back to a subsequent plan update would be inconsistent with national policy and fails to adequately respond to the requirements under the duty to co-operate.

The emerging plan fails to provide any such clear commitment to meeting Reading’s unmet need. The Housing Background Paper states that this exercise should be undertaken through the review of the local plan once Reading has clarified the extent of unmet need through its own local plan review.

RBC’s unmet need is primarily due to its constrained administrative boundaries, which results in the lack of greenfield sites for development, and noting RBC is now subject to the 30% uplift to the minimum Standard Method OAN, and is substantively reliant on brownfield sites to meet housing needs. As evidenced by the unmet need of their adopted Local Plan, brownfield sites within RBC are diminishing.

Furthermore, the location of the developable sites is predominately central and lend themselves to flatted development. Consequently, RBC will likely be supplying a lack of family homes, alongside likely failing

to meet its own OAN minimum needs, within the borough to meet local needs. This further promotes the need for Tilehurst, as a settlement which is located and essentially forms a functional suburb of Greater Reading, to pick up the unmet need for RBC's family homes.

It is also notable RBC's last recorded 5YHLS figure was 2 years in 2021, which is less than 2 years after their Local Plan was adopted. This downwards trajectory so early in the plan period clearly indicates their allocated sites are already not delivering at anticipated rates. This assumedly relates to the dependence on brownfield sites which are generally slower to deliver housing in comparison to greenfield sites. As a consequence of RBC's housing trajectory, the 230 home shortfall will likely increase in the next Local Plan Review.

To redress these concerns, Darcliff recommends West Berks Council reconsider including a specified commitment toward meeting at least the existing identified unmet needs of Reading Borough within the District's housing requirement figure under Policy SP12. Furthermore, in meeting this specified amount of unmet need, Darcliff recommends that the Council seeks to identify opportunities to deliver it within locations that are functionally linked to the area in which the unmet need arises.

Consequently, we encourage the council to consider the allocation the Land west of Little Heath Road, Reading, which is capable of accommodating unmet need arising from Reading. The site is capable of meeting Reading's entire unmet need over the entire plan period with further capacity to meet additional need in West Berkshire. It is adjacent to the existing settlement of Reading, so is well-placed to provide for its unmet need in a location that is functionally connected to Reading.

The Duty-to-Cooperate ('the Duty')

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

A fundamental requirement of a Local Plan is to meet the area's development needs as well as any needs that cannot be met within neighbouring areas unless there are policies in the Framework that protect areas or assets, or adverse impacts of doing so would significantly and demonstrably outweigh the benefits taken as a whole (NPPF, Paragraph 11). Indeed, Paragraph 35 of the NPPF notes that this is an express requirement of a sound Local Plan.

Furthermore, paragraph 24 of the NPPF is clear that LPAs have a duty to cooperate with each other and with other prescribed bodies, on strategic matters that cross administrative boundaries. The NPPF goes on to note that '*...joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere*'.

The NPPF is clear that the Duty is not simply a bureaucratic exercise but one which should ensure Local Plans are *effective* and *positively prepared*. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.

Importantly, the requirement is to 'cooperate', rather than to just 'communicate', although it is accepted that the Duty to Cooperate is not *de facto* a duty to agree. There is however an expectation that neighbouring authorities will work together to collectively address strategic matters, including meeting housing need.

The Oxford English Dictionary ('OED') definition of *cooperate* is to 'work together to achieve something', whereas the OED definition of *communication* is to 'share or exchange information'. There is a fundamental difference between the two, with the emphasis in cooperation being to achieve something. Engagement alone is therefore insufficient to comply with the Duty.

From review of the signed statement of common ground it appears the HMA authorities have undertaken and satisfied a process of identifying material strategic planning matters. And there has been a process of communication considering the identified strategic matters. However, we do not consider the arrived at conclusion of not undertaking any action to remedy Reading Borough's unmet need until such time as a future plan review is undertaken satisfies the base expectation and requirement of co-operation. We are also concerned by the apparent lack of ongoing co-operation and engagement. These matters undermine confidence in the effectiveness of the process undertaken in context of the DtC.

Failure of WBDC to properly cooperate with neighbouring authorities and other bodies to meet development needs would therefore result in the emerging Plan being found unsound. It is essential that WBDC fully cooperates with other LPAs to meet Reading's identified unmet housing needs. To redress this issue, Darcliff encourages the Council to consider the allocation of the Land west of Little Heath Road, Reading, to meet a specified proportion of the unmet need arising from Reading.

<p>4. Proposed Changes</p>	<p>i) Provision will be made for 8,724 to 9,146 <u>9,588</u> net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 <u>564</u> dwellings per annum. The target figure of 538 <u>564</u> dwellings per annum does not constitute a ceiling or cap to development. <u>The target includes the provision of 230 dwellings toward meeting the unmet need arising from Reading borough, which is to be accommodated as close to the Eastern Urban Area as possible.</u></p> <p>ii) There should be no net losses from the existing stock of homes in West Berkshire. Existing homes should be retained in residential use (or replaced at least in equal numbers, normally on the proposed site), unless there is a reasoned justification in the form of a benefit to the wider community for a change of use. Developments should utilise opportunities to make better use of the existing housing stock.</p>
<p>5. Independent Examination - If your representation is seeking a</p>	<p>Yes</p>

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucklebury Parish Council (Represented by Andrew Black Consulting)
Consultee Full Name	Bucklebury Parish Council
Consultee Organisation	Bucklebury Parish Council
Agent Full Name	Andrew Black
Agent Organisation	Andrew Black Consulting
Comment ID	PS1271
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:11:00
Attached Files	Andrew Black Consulting (Bucklebury PC) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	No

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep' for full consultation response]</p> <p>Timing of Consultation</p> <p>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep' for full consultation response]</p> <p>On 6 December 2022, Michael Gove, Secretary for Levelling Up, Housing and Communities, released a written ministerial statement which set out the following in relation to Local Plans:</p> <p><i>We will end the obligation on local authorities to maintain a rolling five-year supply of land for housing where their plans are up-to-date. Therefore, for authorities with a local plan, or where authorities are benefitting from transitional arrangements, the presumption in favour of sustainable development and the 'tilted balance' will typically not apply in relation to issues affecting land supply.</i></p> <p><i>I also want to consult on dropping the requirement for a 20% buffer to be added for both plan making and decision making – which otherwise effectively means that local authorities need to identify six years of supply rather than five. In addition, I want to recognise that some areas have historically overdelivered on housing - but they are not rewarded for this. My plan will therefore allow local planning authorities to take this into account when preparing a new local plan, lowering the number of houses they need to plan for.</i></p> <p>Subsequently on the 22 December 2022, the Department for Levelling Up, Housing and Communities (DLUHC) commenced a consultation on the draft amendments to the NPPF which runs until March 2023.</p> <p>In accordance with the Written Ministerial Statement, paragraph 61 of the NPPF in relation to <i>delivering a sufficient supply of homes</i> is proposed to be amended (in bold) to require the following:</p> <p><i>To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be – unless exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need; in which case the alternative used which should also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for [footnote 29].</i></p> <p>Policy SP12 of the Local Plan sets out provision will be made for up to 9,146 additional homes. This is based on the Local Housing Need Figure of 513 dwellings per annum which is based on the 2014-based ONS Household Projections. A shortfall of 230 dwellings from Reading Borough Council has been added in to the housing requirement.</p> <p>Alongside the changes to the NPPF the Consultation Document published by DLUHC states that the government will review the implications on the standard method of new household projections data based on the 2021 Census which will be published in 2024.</p>

It is therefore clear that the direction of travel is for a plan led system where the amount of housing which must be planned for within any local plan is likely to be significantly reduced from the 513 dpa figure in the WBC LPR which is based on outdated ONS projections, and a flawed methodology used to derive a housing target. Other local authorities have chosen to pause further progress on local plans whilst the extent of the changes to the method of housing need calculation is fully understood.

The consultation also proposes significant changes to the presumption in favour of sustainable development as applied to plan making under paragraph 11 of the framework. The changes to paragraph 11b are also significant and state that:

b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas [footnote 6], unless:*

i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area [footnote 7]; or

*ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; **such adverse impacts may include situations where meeting need in full would mean building at densities significantly out of character with the existing area [footnote 8]; or***

iii) there is clear evidence of past over-delivery, in terms of the number of homes permitted compared to the housing requirement in the existing plan; in which case this over-delivery may be deducted from the provision required in the new plan

The Housing Delivery Test results published in January 2022 show that WBC provided 117% of the required housing over the preceding three years. However closer examination of the figures shows a more significant oversupply in the last year

[see page 8 of attachment 'Andrew Black Consulting (Bucklebury Parish Council) for table]

Given this picture it is clear that this would be taken into account if the plan were to be brought forward under the new measures in the consultation version of the NPPF. This could mean that large scale release of sites such as North East Thattham would be wholly unnecessary.

Numerous other local authorities have taken the opportunity to pause their plan making progress until the results of the consultation are released and the changes to Planning Policy are finalised. It is illogical that WBC has not taken the same opportunity.

Site Selection Process

BPC submit that the Site Selection Process undertaken by WBC was fatally flawed from the outset and has resulted in a plan which is wholly unjustified and as a result is unsound.

The Site Selection Methodology Paper (January 2023) forms part of the evidence base for the LPR. The Paper simply repeats much of the policy context which the plan is based upon and correctly references the methodology as set out in the Planning Practice Guidance (PPG) as follows:

- Stage 1 - *identification of sites and broad locations*
- Stage 2 – *site and broad location assessment;*
 - *Estimating development potential*
 - *Assessing suitability*
 - *Assessing availability*
 - *Assessing achievability*
- Stage 3 – *windfall assessment*
- Stage 4 – *assessment review*
- Stage 5 – *final evidence*

Despite the acknowledgement of the methodology as set out within the PPG there is actually little in the way of evidence presented in the Site Selection Methodology Paper of a rigorous process being undertaken. Moreover, it makes no reference whatsoever of the change in site selection process following the decision to drop the decision to make a large allocation at Grazeley.

The Sustainability Appraisal sets out the following in relation to the Thattham Growth Study:

The Thattham Growth Study [footnote 13] was commissioned to considered how best to deliver strategic development in Thattham. The study identified that strategic development would be required in Thattham to support the service provision and regeneration that Thattham requires. While all sites in Thattham have been considered the only sites (in combination with each other) that are considered suitable for strategic level of development are the group of sites located in North East Thattham. No other alternatives have been considered as there are no other sites, or group of sites within Thattham that would be able to deliver the scale of development required to support the additional infrastructure required (further details in the Site Selection Methodology [footnote 14]).

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>BPC has wider concerns around the way in which WBC has undertaken the consultation process for the LPR and the Duty to Cooperate in general. Failings with Duty to Cooperate are matters which are not capable of being remedied in advance of the plan being submitted for examination. BPC will set out further details of these failings to the inspector should the plan be submitted to the Planning Inspectorate by WBC.</p>

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence through the submission of matters statements and oral evidence from experts. To provide updated evidence to the examiner. For other relevant experts employed by parish council to give detailed technical views on matters.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1418
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>No explanation is given for the restriction of the windfall allowance to sites of 10 units or less, especially given that historically over 70% of new homes were built on windfall sites. The resulting low windfall allowance of 140 units per annum means that far too many units are being allocated on greenfield sites</p> <p>No sites have been allocated within settlement boundaries. For example, planning applications have been submitted for hundreds of units on a redeveloped Kennet Shopping Centre in Newbury. Another example is the London Road Industrial Estate in Newbury where West Berks Council, who own the site, have put forward re-development schemes that include converting part of the site to housing.</p> <p><i>Para 6.25 - 6.27</i> The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The threshold should be site area of one hectare, with allowance for those already with planning permission (as the LPR does with sites of less than ten units). This would increase the windfall allowance significantly. Greenfield housing site allocations should then either be reduced in size or removed altogether to compensate</p> <p>Sites within settlement boundaries that are in the Brownfield Land Register should be evaluated and, if appropriate, be allocated in the LPR and included in the target housing total. Ditto sites subject to suitable major planning applications to change land use to housing.</p> <p>Greenfield housing site allocations should then either be reduced in size or removed altogether to compensate.</p> <p>Paragraphs 6.25 to 6.27 should be removed from the LPR.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	Yes

* Yes * No	
5. Independent Examination	To explain to the inspector why the windfall allowance should be changed To explain to the inspector why sites within settlements should be allocated in appropriate circumstances Paragraphs 6.25 to 6.27 should be removed from the LPR.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sulham Estate (Represented by Barton Willmore now Stantec)
Consultee Full Name	Mr Henry Scutt
Consultee Organisation	Sulham Estate
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1638
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:13:00
Attached Files	PS1638 Barton Willmore (Sulham Estate) Aff Housing Tech Note.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	Yes

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>On the scope of the Regulation 18 Consultation we commented that we do not agree with the proposed policy on the basis that the housing target is insufficient. We note that the Regulation 19 Draft Local Plan has further lowered the housing target. Nevertheless, the housing provision set out under Policy SP12 is consistent with the Council's evidence base, as detailed in the Housing Background Paper (January 2023). This is also consistent with the standard method figure.</p> <p>Please refer to the Affordable Housing Need Technical Note prepared by Barton Willmore now Stantec, dated March 2023 submitted with these representations [see attachment 'PS1638 Barton Willmore (Sulham Estate) Aff Housing Tech Note'] for our full response in relation to SP12. A brief summary follows but this should be read in the context of the full Technical note.</p> <p>The accompanying Technical Note undertakes a review of the affordable housing delivery in West Berkshire against the identified need set out within the emerging evidence base. The pipeline of sites identified as part of Council's five year land supply, all of which have potential to contribute to the supply of affordable housing, is also reviewed. This provides a basis for understanding the extent to which affordable housing supply is likely to keep pace with identified need. The Technical Note concludes that the rate of affordable housing delivery needs to increase from the existing rate and continue into the future to ensure that the needs for West Berkshire are met. When combining the existing and future shortfall in affordable housing, there is a need to provide up to 10,406 affordable dwellings to ensure that the needs of West Berkshire are met.</p> <p>In light of the above, it is evident that the number of homes delivered in total across West Berkshire should increase, which in turn will increase the number of affordable dwellings delivered within the district.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>To ensure that more affordable homes are delivered, the Council should increase their housing target and allocate further sites for development including our client's site at Our client's site at Hall Place Farm (reference TIL18) within the West Berkshire Housing and Economic Land Availability Assessment ('HELAA') (February 2020).</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	Yes

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hindocha, Atul (Represented by Iver Consulting Ltd)
Consultee Full Name	Atul Hindocha
Consultee Organisation	
Agent Full Name	Huw Williams
Agent Organisation	Iver Consulting Ltd
Comment ID	PS1654
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 12:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>NPPF clearly states Brownfield sites to be brought forward for development prior to the release of greenfield sites</p> <p>Re-use of brownfield sites prior to release of greenfield land for redevelopment</p> <p>It is a requirement of all Local Authority's to seek the re-use of brownfield sites prior to the release of green field sites for residential development. This is particularly so when sites such as the former Newbury Leisure Park are redundant and available for development.</p> <p>Concluding remarks</p> <p>The NPPF states "local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs"</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Priority should be given to the release of brownfield sites for residential development prior to greenfield releases being made</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>The use of brownfield sites prior to greenfield release should b a fundamental objective of the local plan which needs to be addressed. We would therefore wish to have a seat at the examination</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	CALA Group Ltd (Represented by Pro Vision)
Consultee Full Name	Mr Paul McCann
Consultee Organisation	CALA Group Ltd
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS1215
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 15:03:00
Attached Files	PS1215 Pro Vision (CALA Group) (Hungerford) Pro Vision (CALA Group) Pinchington Lane.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	No

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>Extract of full representation relevant to this consultation point. For full representation see attachment. Footnotes are included in the attachment.</i></p> <p>The housing requirement</p> <p>We have concerns regarding the effectiveness of the proposed development strategy as set out for housing in Policy SP12.</p> <p>Policy SP12 explains that provision will be made for a range of 8,721 to 9,146 net additional homes for the plan period.</p> <p>We consider that there is clear justification for higher housing growth in the district to meet the level of need identified in the evidence, not least in respect of addressing affordability.</p> <p>Affordable housing</p> <p>Addressing affordability of homes in the district is clearly a very significant matter for the LPR.</p> <p>The Vision (Chapter 3) of the Plan states that the Council will ensure that delivering "...housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability" [our emphasis].</p> <p>This is backed-up by the evidence base. The Updated Housing Needs Assessment (dated, July 2022) confirms that there is a "notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the District" [our emphasis]. The conclusion adds that "the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise" [our emphasis].</p> <p>The report advises that the scale of affordable housing need is 697 dpa (a 188% increase on need following the Council's Housing Needs Assessment in 2020). This is also 136% of the standard method minimum LHN. Accordingly, the report advises that theoretically, if 40% of all new housing delivered was for affordable housing around 1,740 dpa would be needed to meet West Berkshire's affordable housing need in full (paragraph 3.24). The Council's affordable housing position is clearly worsening.</p> <p>It is acknowledged that the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and thus reduce affordable housing needs) through the affordability uplift in the standard method. However, West Berkshire's past housing delivery rates have generally been in line - if not greater - than the current minimum LHN and yet affordability problems/affordable housing need remains pressing. As a result, not positively addressing the affordability problems and affordable housing need across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered, including in the Sustainability Appraisal (SA/SEA) for Policy SP12.</p> <p>In this context, we have doubt that the LPR's housing requirement will be effective in improving affordability and therefore risks failing to deliver on its own vision. For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement.</p> <p>Please also see section 3, where we comment more specifically on the housing need in Hungerford. <see Rep ID:PS1216 or Attached full representation></p> <p>Buffer to housing supply</p> <p>The LPR's housing target includes a 5% 'buffer' on top of the LHN at the top end of the range.</p> <p>The Council states in its Housing Background Paper (HBP) that its plans to meet the upper of the range in an effort to boost supply and have some built-in flexibility (footnote 4).</p> <p>The Regulation 18 version of the West Berks LPR included a 10% buffer. The Council's explanation for the reduction is the limitations and constraints of a largely rural district (footnote 5). On the face of it, that is justified by the Written Ministerial Statement in the HBP.</p> <p>However, this appears to be counter-intuitive; the greater level of constraint, the greater level of buffer is required to provide greater prospect of meeting the housing need, especially where one of the Plan's priorities is to improve affordability. Furthermore, the SA/SEA undertakes an analysis, at Appendix 4 Section 2.1, between LHN+ 5% and LHN+ 10%. The LHN + 10% scores significantly better with 'overall positive, with some significantly positive effects'. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue pressure. The SA/SEA therefore takes forward a apparently incorrect interpretation of the evidence base.</p> <p>The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district. Indeed, none of the key environmental</p>

constraints (e.g. AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt, internationally protected habitats etc.), but instead will shape the scale, form and direction of growth across the district via the broad spatial strategy.

Evidence in the HELAA indicates that there are many more available sites in the HELAA to accommodate further growth, notwithstanding that not all of them can be expected to prove to be suitable and achievable.

In addition, an appropriate buffer will support greater flexibility in the Plan if the anticipated housing supply does not deliver. This is considered further at Section 4 below. <see heading Meeting the housing requirement>

A more effective buffer/uplift to the housing requirement is likely to fall between 10-20%.

This would increase the Council's target housing requirement to 564 - 616 dpa, which would equate to finding a supply of 9,588 – 10,472 dwellings up to 2039. This would more closely follow the tried and tested approach in other recently adopted Local Plans, including South Oxfordshire (c. 27% buffer), Windsor & Maidenhead (c. 12% buffer), and North Herts (c. 13% buffer), notwithstanding that all of these districts vary in the precise nature of their constraints and opportunities. Further, the neighbouring draft Wokingham Local Plan currently includes a 20% buffer.

Duty to cooperate

The LPR (footnote 6) notes that there is a current unmet need from Reading Borough Council of around 230 dwellings up to 2036 and that there will be a need to consider any further unmet need given the housing needs generated by the standard method (i.e. the government's 35% uplift to Reading as one of the largest urban areas in England) (footnote 7).

Reading has identified that a five year review of its Plan is required by 2024. This will need to include an urban capacity assessment. A revised future unmet need figure is therefore likely to be available shortly. It is anticipated that the future unmet need from Reading will be significant – the housing requirement increases to 907 dpa from Lichfield's analysis of the standard method for local housing need, dated April 2022 (from 689 dpa in the current Reading Borough Local Plan). However, at this stage without further evidence there is no certainty on what the unmet need will be or how it will be redistributed. However, it is widely accepted that Reading has limited land capacity to deliver these additional housing requirements in full and, therefore, highly likely that neighbours, including West Berkshire will be required to deliver in meeting some of this unmet need.

In this context, it is appropriate that the LPR plans positively for greater flexibility in its housing requirement rather than reacting to events during the plan period.

Meeting the housing requirement

We have reviewed the proposed development strategy and have identified areas of concern its effectiveness to deliver the housing requirement over the plan period.

The LPR identifies several sources of housing supply across the plan period at Table 2 of the Plan. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.

In terms of existing allocations, the history of some of these sites identified in the supply that do not currently have planning permission (around 95 units, excluding Sandleford Park West) or only have outline permission (392 units, excluding Sandleford Park East) or where a site's delivery has been continually delayed clearly does not support confidence in their timely delivery. As such, it is considered that a 10% non-implementation rate is factored in to, at least, some of this supply would provide a more robust strategy.

In terms of non-allocated sites with planning permission, Table 2 shows that nearly 1,958 dwellings are provided on un-allocated sites (including prior approvals) with planning permission. Again, a 10% non-implementation rate would provide a more robust strategy as it is unlikely that all these permissions will be delivered over the plan period, for various reasons, potentially including changing constraints (such as the phosphates issue in the Lambourn catchment).

Windfall allowance

The housing supply includes a windfall allowance of 1,949 dwellings (or 26.6% of the total housing supply) up to 2039. It has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 – 2022.

In the context of the latest consultation on the revised NPPF and the Levelling Up and Regeneration Bill also place a greater emphasis and need to provide a genuinely plan-led system, we consider that the LPR would be more effective if it relied less significantly on this level of unplanned development. A more positively planned approach would help to ensure greater delivery of affordable homes, noting that small windfall sites are generally less able to deliver this and over reliance on them risks exacerbating the affordability issues in the district and failing to deliver on a key priority of the plan (as discussed above).

The Council contend that past delivery of windfalls has been consistent and reliable. The Council has not provided any evidence however about future supply to justify such an approach.

There also appears to be a recent trend that yield from windfalls are reducing on small sites. As set out at Table 3.1 of the Housing Background Paper the delivery over the last three years 2019/20 to 2021/22 has reduced to an annual average of 97 completions. Indeed, in the last five years the annual average is also only 112 completions, notably lower than LPRs anticipation of 140 dpa. What evidence is there to give confidence that the rates will increase over the plan period?

In addition, it is also worth noting the windfall allowance is taken from smaller sites (i.e. less than 10 new homes) and, therefore, a reliance on sites for potentially between 1-4 dwellings in the housing supply will not deliver any affordable housing and further exacerbate affordable housing need within West Berkshire, contrary to the LPR's priority to improve affordability of housing for its existing and future residents.

	<p>The implications of this are important. Even a relatively modest but more realistic reduction in the windfall allowance from 140 to 100 dpa would reduce immediately the total housing supply by, at least, 549 dwellings.</p> <p>A more robust and effective alternative is to take forward more of the available and suitable sites from the HELAA. This will reduce the reliance on windfall sites and provide greater certainty of supply in a positively-planned way.</p> <p>Scale and timescales for Housing Delivery</p> <p>Notwithstanding the above, the Council's assumptions on the expected housing supply from NE Thatcham are also clearly unreasonable.</p> <p>The Housing Background Paper demonstrates that the Council expect NE Thatcham to start delivering 150 dpa from 2029/30 to 2038/2039. On the face of it, this appears to be overly optimistic (footnote 16).</p> <p>The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), dated February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2024 in the LDS) and taking a view that the planning application for this site is submitted by the end of 2024/2025, first completions cannot be projected before 2031/2032. This timescale may be optimistic given there is a need to prepare and agree to a coherent masterplan or development framework, and if, for example, prior mineral extraction is required and/or there are delays to the adoption of the Plan.</p> <p>As noted with the delays with Sandleford Park, and its need for a Secretary of State decision, delivery of strategic allocations is challenging.</p> <p>Furthermore, market evidence suggests that for sites of 1,500, a realistic average annual build out rate is c.100-120 dpa (Source: Lichfield's Start to Finish (2nd Edition)). As such, delivering completions from 2031/32 at 120 dpa would therefore equate to, at best, 960 dwellings over the plan period. A shortfall of 540 dwellings.</p> <p>In conclusion on the matter of meeting the housing requirement, we consider that the LPR is unsound as it:</p> <ul style="list-style-type: none"> • Does not provide sufficient contingency for non-delivery of currently extant planning permissions; • Relies heavily on windfall sites, when there are many alternative available sites identified in the HELAA; • Is unrealistic in its assumptions about delivery rates at the strategic allocations; • Lacks a vision for strategic development beyond the plan period. <p>If found unsound on these points, the remedy is to revisit the HELAA and engage with the promoters and other stakeholders to bring forward more of the most suitable sites for development.</p> <p>Attachments: full representation (Hungerford) including appendix A and B Full representation (Pinchington Lane, Newbury) including appendix A and B</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To examine our objections to the development strategy
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	Yes

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1667
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	Thatcham Town Council_Press Release Dec 22.docx
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The draft Local Plan was approved to move to Regulation 19 Consultation by a meeting of West Berkshire Council on 1st December 2022. This approval was given on the basis that the size of the development when complete would be approximately 1,500 dwelling. The Council's press release on this decision stated:</p> <p>"Councillors allocated a new strategic development of 1,500 new homes in north-east Thatcham, a significant decrease from the 2,500 previously proposed."</p> <p>"We have cut the proposals for any future development in north-east Thatcham by 1,000 homes, which is a big change." (<i>the full press release is copied below - see attached document Thatcham Town Council_Press Release Dec 22</i>)</p> <p>The emerging draft Local Plan (December 2020) stated at paragraphs 6.12 and 6.13:</p> <p>"This includes the strategic allocation at North West Thatcham for up to 2,500 homes where delivery of at least 1,250 dwellings is anticipated within the plan period."</p> <p>The Local Plan Submission draft (January 2023) states in Policy SP17: "The site is to be allocated for approximately 1,500 dwellings which will be completed within the period of the plan.";</p> <p>at paragraph 6.22: "additional housing supply on newly allocated sites ... includes the strategic allocation at North West Thatcham for up to 1,500 homes within the plan period.";</p> <p>and at paragraph 6.61: "Delivery of approximately 1,500 dwellings is anticipated within the plan period.</p> <p>Policy SP17 is silent on the possibility of additional dwellings following the plan period.</p> <p>Policy SP17 also states: "The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to."</p> <p>The Thatcham Strategic Growth Study was prepared for a site allocation of 2,500 dwellings, and has not been updated following the decision. It could there be interpreted that one of the 'guiding principles' of the Growth Study is a final size for the development of 2,500 dwellings.</p> <p>Even worse, an applicant for planning permission might 'cherry pick' a site allocation of up to 2,500 dwellings with the infrastructure provisions in Policy SP17 that are based on the needs of 1,500 dwellings.</p> <p>The wording of Policy SP17 is therefore unclear and ambiguous on the expected final number of dwellings on the North East Thatcham site. It is therefore not evident how a decision maker (whether West Berkshire Council or the Planning Inspectorate in case of an appeal) would interpret the policy.</p> <p>Paragraph 16 of the NPPF (July 2021) states that: "Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Policy SP17 is therefore not in accordance with Paragraph 16 of NPPF, and is therefore not consistent with national policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>To make this aspect of policy SP17 sound, it must be clarified that the 1,500 dwellings is the final number when development is completed, and not the number completed during the plan period.</p> <p>Supporting evidence needs to be provided to justify this number.</p> <p><i>NOTE: This comment is without prejudice to other representations by the Town Council on Policy SP17.</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the</p>

	<p>draft Local Plan. The Town Council can provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gittins, Jeremy
Consultee Full Name	Jeremy Gittins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS737
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Thank you for opportunity to feedback and hope our comments are acted on</p> <p>The Plan appears to be based on an outdated concept of housing targets. These targets were previously binding, but recent policy changes announced by Housing Secretary Michael Gove mean they are now advisory.</p> <p>West Berkshire Council therefore had the opportunity to set their own more enlightened target of allowing building only on brownfield, previously developed land, of which there are over 45 hectares in the district,</p>

	<p>which could accommodate over 2,500 homes. Given that so many GP surgeries are no longer accepting new patients, and other similar examples of overstretched local resources, 2,500 new homes would be a stiff target to meet but at least one based on the logic of not removing farmland from food production or harming the countryside in general.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Plan appears to be based on an outdated concept of housing targets. These targets were previously binding, but recent policy changes announced by Housing Secretary Michael Gove mean they are now advisory.</p> <p>West Berkshire Council therefore had the opportunity to set their own more enlightened target of allowing building only on brownfield, previously developed land, of which there are over 45 hectares in the district, which could accommodate over 2,500 homes. Given that so many GP surgeries are no longer accepting new patients, and other similar examples of overstretched local resources, 2,500 new homes would be a stiff target to meet but at least one based on the logic of not removing farmland from food production or harming the countryside in general.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	dont understand this term
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes</p>	Yes

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1298
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:28:00
Attached Files	PS1298 Opus Works (NCGC & Chartfield) Table 2
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Policy SP12 - Approach to Housing Delivery</p> <p>This policy states that 8,721 to 9,146 net additional homes are required for the period 1 April 2022 to 31 March 2039, equating to 513 to 538 dwellings per annum. It is noted that the higher figure provided does not constitute a ceiling or cap to development. New homes will be located according to policies SP1, SP3 and DM1. It is important for the council to ensure that the reference to the housing target figure not being a “ceiling or cap to development” is retained in the policy. This is because, this is a positive message to send out, whilst there is a nationally recognised shortage of housing in the UK and any policy that seeks to facilitate additional housing provision at this time is to be encouraged.</p> <p>The policy states that new housing will be focused in and adjoining the larger settlements, including the largest and most sustainable settlement of Newbury. Therefore, a development of 31 dwellings on land at NCGC, on the eastern edge of Newbury, will comply with policies SP1 and SP3, which will enable housing to be provided to meet the council’s housing requirements, as set out in policy SP12. The proposed dwellings will make a valuable contribution towards the housing needs of the district. The allocation of land on the edge of Newbury at NCGC will comply with this policy, by helping to provide much needed new housing in a sustainable location, where the impacts of development can be satisfactorily mitigated.</p> <p>Policy SP12 – Approach to Housing Delivery is supported. However, it is considered that the text should not be amended to remove reference to the delivery of housing over and above the “target figure” of 538 dwellings per annum.</p> <p><i>[For Table 2 see attachment 'PS1298 Opus Works (NCGC & Chartfield) Table 2']</i></p> <p>Paragraph 6.12 states that the requirement of 9,146 dwellings minus the supply of 7,337, means that sites for a further 1,809 homes need to be found. In addition, there needs to be some built-in flexibility to allow for phasing issues and to allow for non-delivery, particularly of larger sites, which need a great deal of up-front investment in roads and other infrastructure. Therefore, it is important to make it clear that the current shortfall of 1,809 dwellings should be a minimum and not a ceiling or a cap to development, as required by policy SP12 (see above).</p> <p>It is likely that larger sites identified in the Local Plan will have some problems with delivery. It is unlikely that they will deliver the housing numbers predicted in the suggested timescales, because all larger sites encounter issues with such matters as site assembly, ownership and title issues, capital funding, infrastructure costs and delivery, planning permissions and legal undertakings, such as section 38, 106 and 278 agreements. Some larger sites, such as North East Thatcham, are also the subject of vehement objections from residents and scrutiny by Full Council and may not actually come forward in the numbers identified in the LPR during the period to 2039, particularly as sales enquiries and corresponding build rates start to recognisably decline. Overall, it should be expected that the larger sites will not deliver the housing numbers needed in a timely fashion and there is a real need for more medium-sized and smaller sites, of less than 100 dwellings, to help to fill the gaps. Smaller sites can be delivered in short time</p>

	<p>frames, as they do not have the depth of issues that the larger sites have. Therefore, the council should allocate more smaller sites to ensure that housing needs are met in the short to medium-term.</p> <p><i>Table 2 and Paragraph 6.12 – Housing Supply at March 2022 is supported. However, it is considered that it should be made very clear that the current shortfall of 1,809 dwellings is a minimum provision and not a ceiling or cap on development.</i></p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<i>It is considered that it should be made very clear that the current shortfall of 1,809 dwellings is a minimum provision and not a ceiling or cap on development.</i>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1683
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	No
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
Please give reasons for your answer	<p>The policy is unsound as it does not provide the necessary clarity required of a policy as set out in paragraph 16 of the NPPF as well as failing to take account of the unmet needs of a neighbouring area as required by paragraphs 11 and 61 of the NPPF.</p> <p>Housing needs</p> <p>The Council state that provision will be made for between 8,721 and 9,146 new homes over the plan period, between 513 to 538 dwellings per annum. This range is based on the minimum required using the standard method and that minimum plus an additional 5% in order to support the government objective of boosting the supply of homes. The Council suggest in paragraph 2.32 of the Housing Background Paper that the use of a range is common practice. The HBF would disagree and consider the use of a range to be inconsistent with the NPPF.</p> <p>Whilst the HBF supports Councils that seek to boost the supply of homes the use of a range does not provide the necessary clarity, as required by paragraph 16 of the NPPF, as to the Council's annual housing requirement against which delivery will be measured. It could also create confusion as to the application of the 5% buffer required, as set out in paragraph 74 of the NPPF, to provide flexibility in the supply of homes and provide choice and competition in the market for land. The Council needs to be clear in policy what the minimum requirement is and what will be supplied, including any buffer. To confuse the two will just create difficulties the assessments of five-year land supply on any appeals that are brought forward after its adoption.</p> <p>Unmet housing needs</p>

The Council refers to Reading's unmet housing need of 230 dwellings in paragraph 6.5 of the Local Plan. However, no mention is made as to how this unmet need will be met with the statement of common ground only stating that this will be met within the West of Berkshire HMA. The NPPF is clear at paragraph 61 that the unmet needs of neighbouring area must be taken into account when establishing the number of homes to be planned for. Given that the Bracknell Forest Local Plan, that has recently been through its examination in public, has not included any additional supply to address the shortfall in Reading it falls to either Wokingham or West Berkshire to include it within their housing requirement. The Council has had a number of years to ensure this relatively small amount of additional supply is addressed and it should have been included either wholly or in part within the Council's housing requirement.

Instead, the Council are looking to push back the delivery of these homes. The Housing Background Paper states at paragraph 2.24 that distribution of unmet needs will be done through a local plan review before the need arises. However, Planning Practice Guidance (PPG) states that "Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates ..." which therefore requires these needs to be addressed in this local plan not a future update of this plan or the Reading Local Plan. It must also be noted that given the physical constraints faced by Reading it is unlikely that a review will address these needs in future, it is more likely that unmet housing needs in Reading will grow and will need to be addressed in West Berkshire and the other authorities surrounding Reading.

Affordable housing

As the Council will be aware the local housing needs assessment (LHNA) is the starting point and that there may be circumstances where the Council must plan for a higher level of housing needs. One such circumstance, as highlighted in paragraph 2a-024 of PPG, is where increased housing delivery would help deliver the required number of affordable homes. The Council's evidence indicates that there is a need for at least 330 affordable and social rented homes per annum.

This is roughly 60% of the Council's housing requirement. Given that the principle mechanism for the delivery of affordable homes is through the allocation of market housing there is justification for adopting a higher housing requirement.

Housing Supply

Whether or not the Council is meeting its housing needs over the proposed plan period is dependent on the requirement. Based on the upper end of the range the Council is not meeting its housing needs with a small shortfall of 89 homes. Using the minimum requirement of 513 there is small buffer of 336 homes over the plan period, circa 4% of total need. As such there is very limited flexibility in supply and no certainty that needs will be met over the plan period. This is a very small buffer in terms of overall supply and as such the ability of the plan to show that needs can be met in full across the whole plan period will be at risk from changes in delivery rates on any sites that deliver towards the end of the plan period. Given the reliance on delivery in the second half of the plan period from the strategic allocation at North East Thatcham and development of windfall sites a more substantial buffer in overall supply would provide greater certainty that the plan is deliverable over the plan period.

As to the degree of buffer required it is not possible to provide a definitive answer. The size of the buffer required to provide the necessary flexibility will depend on the nature of the supply coming forward across the plan period. A greater reliance on a few small sites will need a higher buffer between needs and supply. With regard to the West Berkshire Local Plan the HBF would recommend that a buffer of at least 15% is included to ensure the plan meets housing needs in full.

The HBF are also concerned that the five-year land supply on adoption in 2024/25 is marginal against either the upper or lower range. On the upper requirement of 538 dpa the Council will have a land supply of just 5.04 on adoption and a 5.38 using the 513 dpa requirement. This is marginal and could see the Council not having five-year land supply on adoption should there be changes to the delivery expectations in any of the allocated sites. In order to provide a more robust five-year land supply in the early years of the local plan it will be important for the Council to revisit its land supply and seek to include more small and medium sized sites that will deliver earlier in the plan period. This would also help to ensure that the Council ensures that at least 10% of the housing requirement is delivered on identified sites of less than one hectare. At present it is not clear that this requirement in paragraph 69 of the NPPF has been achieved with the plan identifying just 65 homes coming forward on allocated sites that are less than one hectare. The HBF would therefore recommend that additional small and medium sized sites are allocated to meet the requirements of the NPPF and provide a more secure five-year housing land supply on adoption.

Windfall

The Council have concluded that at least 1,958 homes will come forward on windfall sites – around 20% of overall supply. Firstly, we would suggest that rather than rely on this level of windfall the Council seeks to allocate more small sites in order to meet the requirement set out in paragraph 69 of the NPPF. The proactive identification and allocation of such sites is a key part of plan making that was included in the NPPF to provide more support to SME house builders who rarely have the security of sites being allocated through the local plan. A thriving SME sector is key to delivering a mix of homes and ensuring a robust supply in the early years of any plan as this sector will bring forward sites rapidly once a plan is adopted.

With regard to the level of small site windfall the HBF would suggest that there is a risk that the evidence could overstate the how many homes will come forward on such sites. The evidence supporting this level of supply is set out in section 3e of the Housing Topic Paper with table 3.1 indicating that on average 140 small sites came forward through windfall each year. However, this is a long-term average and the HBF is concerned that this may well be a declining source of supply given the high average rates in previous years. For example, over the last five years small site windfalls have delivered on average 113 dwellings each year. Whilst there is evidence to support a small sites windfall allowance, we would recommend that a 20% reduction is made reflect the lack of certainty of this source of supply at the proposed rate.

	The HBF agree with the Council's decision not to include larger and medium sized sites as part of any windfall allowance. There is no certainty as to the when or if these types of sites will come forward over the plan period. It is also the case that large windfalls that have been developed previously are similar to the types of sites that are allocated in the local plan and a such are far less likely to come forward. Their inclusion would in effect double count their delivery in the proposed trajectory.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1315
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>(same comments submitted under Policy SP17 - ref: PS1318)</p> <p>Housing allocation for North East Thattham</p> <p>The draft Local Plan was approved to move to Regulation 19 Consultation by a meeting of West Berkshire Council on 1st December 2022. This approval was given on the basis that the size of the development when complete would be approximately 1,500 dwelling. The Council's press release on this decision stated:</p> <p>"Councillors allocated a new strategic development of 1,500 new homes in north-east Thattham, a significant decrease from the 2,500 previously proposed."</p> <p>"We have cut the proposals for any future development in north-east Thattham by 1,000 homes, which is a big change."</p> <p>The emerging draft Local Plan (December 2020) stated at paragraphs 6.12 and 6.13: "This includes the strategic allocation at North West Thattham for up to 2,500 homes where delivery of at least 1,250 dwellings is anticipated within the plan period."</p> <p>The Local Plan Submission draft (January 2023) states in Policy SP17: "The site is to be allocated for approximately 1,500 dwellings which will be completed within the period of the plan."; at paragraph 6.22: "additional housing supply on newly allocated sites ... includes the strategic allocation at North West Thattham for up to 1,500 homes within the plan period."; and at paragraph 6.61: "Delivery of approximately 1,500 dwellings is anticipated within the plan period. Policy SP17 is silent on the possibility of additional dwellings following the plan period."</p>

	<p>Policy SP17 also states: “The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to.”</p> <p>The Thatcham Strategic Growth Study was prepared for a site allocation of 2,500 dwellings, and has not been updated following the decision. It could there be interpreted that one of the ‘guiding principles’ of the Growth Study is a final size for the development of 2,500 dwellings.</p> <p>Even worse, an applicant for planning permission might ‘cherry pick’ a site allocation of up to 2,500 dwellings with the infrastructure provisions in Policy SP17 that are based on the needs of 1,500 dwellings.</p> <p>The wording of Policy SP17 is therefore unclear and ambiguous on the expected final number of dwellings on the North East Thatcham site. It is therefore not evident how a decision maker (whether West Berkshire Council or the Planning Inspectorate in case of an appeal) would interpret the policy.</p> <p>Paragraph 16 of the NPPF (July 2021) states that: “Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. Policy SP17 is therefore not in accordance with Paragraph 16 of NPPF, and is therefore not consistent with national policy.</p> <p>NOTE: as stated in other representations, I believe that the number of 1,500 homes needs to be reviewed. This representation only addresses the clarity of the wording, and not the number.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	To make this aspect of policy SP17 sound, it must be clarified that the number of dwellings defined in the second paragraph of the Policy is the final number when development is completed, and not just the number completed during the plan period.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	If it would assist the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Donnington Valley Group (Represented by Barton Willmore now Stantec)
<p>Consultee Full Name</p>	Paul Michael
<p>Consultee Organisation</p>	Donnington Valley Group
<p>Agent Full Name</p>	Ms Patricia Tercerio
<p>Agent Organisation</p>	Barton Willmore now Stantec
<p>Comment ID</p>	PS1348

Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	On the scope of the Regulation 18 Consultation we commented that we do not agree with the proposed policy on the basis that the housing target is insufficient. We note that the Regulation 19 Draft Local Plan has further lowered the housing target. Nevertheless, the housing provision set out under Policy SP12 is consistent with the Council's evidence base, as detailed in the Housing Background Paper (January 2023). This is also consistent with the standard method figure.

	Notwithstanding the above, the Housing Background Paper (January 2023) advises that housing affordability remains a key issue in West Berkshire, with the Government's 2021 statistics showing the median house price in the district (£380,000) being 9.73 times the average annual earnings (para 6.23). In light of the unaffordability of housing within the District, the Council should consider the wider social and economic benefits of housing provision in excess of the standard method figure.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	In light of the unaffordability of housing within the District, the Council should consider the wider social and economic benefits of housing provision in excess of the standard method figure. This would ensure that the Plan is sound by reason of being 'Justified'.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1656
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 10:41:00
Attached Files	PS1652 Turley (Hathor Property) Full LPR Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Housing Requirement</p> <p>3.9 Policy SP12 confirms that provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 dwellings per annum.</p> <p>3.10 The provision of a range is misleading and confusing. In accordance with paragraph 61 of the NPPF, the current standard method calculation requires provision of a minimum of 513 dwellings in the plan period (unless exceptional circumstances apply – these are not relevant to West Berkshire), and para 74 of the NPPF requires an additional 5% buffer to ensure choice and competition in the market. This equates to 538.65 dwellings.</p> <p>3.11 This should be the minimum starting point for provision of housing. This is implied in the Policy, with reference to the 'target figure of 538 dwellings per annum does not constitute a ceiling or cap to development'. Strictly speaking, the figure should be rounded up to 539 dwellings.</p> <p>Affordable Housing</p> <p>3.12 The local housing needs assessment (LHNA) and application of the Standard Method is the starting point and that there may be circumstances where the Council must plan for a higher level of housing</p>

needs. Paragraph 2a-024 of PPG advises that 'an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes'.

3.13 The Council's evidence indicates that there is a need for at least 330 affordable and social rented homes per annum. This is roughly 60% of the Council's housing requirement. The principal mechanism for the delivery of affordable homes will be through allocation of sites for market housing. There is justification for adopting a higher housing requirement on this basis and a related identification of additional housing sites in suitable locations.

3.16 The LPR proposals for providing new development at Newbury are focussed on the long-standing allocation at Sandleford Park, on greenfield land to the south of Newbury in accordance with Policy SP16. In addition, smaller scale developments will include redevelopment of previously developed land. There are no additional greenfield allocations put forward.

3.17 Councils are required to maintain a five year supply of housing land, and more specifically, in accordance with paragraph 68 of the NPPF policies should identify 'a supply of (a) specific, deliverable sites for years 1 to 5 of the plan period'.

3.18 The deliverability of allocated sites are key to ensuring sites are coming forward as anticipated. There is currently an over-reliance on sites that have not delivered and are therefore retained allocations from the current Core Strategy, or large strategic sites where delivery is likely to be slow, to meet housing needs, particularly in the short-term.

3.19 There are alternative available and deliverable sites adjacent to Newbury that should be considered in the selection of proposed residential allocations to meet the identified housing need in the short to medium term. The planning merits of the Site at Enborne Street, Newbury are considered in Section 2 of these representations.

3.20 The Spatial Strategy recognises that the allocation of greenfield sites is required alongside brownfield development in order to maintain a five year supply of housing land.

3.21 The Council's housing supply position as of 31st March 2022 takes into account the Core Strategy Sandleford Park Strategic Site amongst other sites allocated in the current Plan period, some of which are not being taken forward as proposed allocations as they are at an advanced stage of construction, and existing planning commitments on unallocated sites.

3.22 This totals 7,337 dwellings. The annual requirement of 538 new dwellings results in an additional need of 1,809 dwellings. As outlined above, Policy SP12 acknowledges that the 538 dwellings are not a ceiling nor a cap. There is no specific housing need identified for Newbury within the housing figures.

Summary of Implications for meeting Housing Needs

3.37 It is considered the LPR does not propose sufficient sites that can come forward in the short to medium term to ensure sufficient housing delivery in the first five years of the LPR. In order to provide a more robust five-year land supply in the early years of the LPR it will be important for the Council to revisit its land supply and seek to include more small and medium sized sites that will deliver earlier in the LPR period.

3.38 The allocation of the site at Enborne Street for up to 70 dwellings is ideally located to fulfil this role. *[For details of the site at Enborne Street see Rep ID: PS1652]*

5. Summary and Conclusions

5.1 These representations have been prepared by Turley on behalf of Hathor Property in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023).

5.2 The LPR does not identify sufficient housing to meet identified needs, nor is their sufficient flexibility should circumstances change. The plan period should be extended by a year, and some provision for meeting the unmet needs of Reading should be factored in.

5.3 Equally significantly, even assuming that the planned housing provision within the LPR was appropriate, there is considerable doubt that the LPR will provide for a sufficient supply of housing in the first five years of the LPR period.

5.4 The scale of the strategic allocation at North-East Thatcham is acknowledged as providing the potential for securing infrastructure and facilities alongside development. However, this is unlikely deliver any housing in the short-medium term, and certainly within the five year period. Equally, the Council have carried forward long-standing allocations from the previous adopted Core Strategy and there

	remains significant uncertainty about their deliverability, again especially within the first five years of the LPR.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	<p>Duty to Cooperate</p> <p>3.5 At paragraph 6.5 of the LPR reference is made to the unmet housing need of 230 dwellings as identified within the Reading Local Plan period to 2036. However, no mention is made as to how this unmet need will be met with the statement of common ground between the Local Planning Authorities, only stating that this will be met within the West of Berkshire HMA</p> <p>3.6 The NPPF is clear at paragraph 61 that the unmet needs of neighbouring area must be taken into account when establishing the number of homes to be planned for. Given that the Bracknell Forest Local Plan, that has recently been through its examination in public, has not included any additional supply to address the shortfall in Reading it falls to either Wokingham or West Berkshire to include it within their housing requirement. The Council has had a number of years to ensure this relatively small amount of additional supply is addressed and it should have been included either wholly or in part within the Council's housing requirements.</p> <p>3.7 Conversely, the Council are looking to push back the delivery of these homes. The Housing Background Paper states at paragraph 2.24 that distribution of unmet needs will be done through a local plan review before the need arises. However, Planning Practice Guidance (PPG) states that "Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates ...".</p> <p>3.8 The unmet need should be addressed in this LPR. This unmet need is likely to be exacerbated, given the physical constraints faced by Reading it is unlikely that a review will address these needs in future. It is more likely that unmet housing needs in Reading will grow and will need to be addressed in West Berkshire and the other authorities surrounding Reading.</p>
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr

	Tim Burden
Agent Organisation	Turley
Comment ID	PS1825
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

<p>Please give reasons for your answer</p>	<p>3. Regulation 19 Proposed Submission document representations</p> <p>3.1 We generally support the draft Local Plan and the proposed strategy for the Plan period, including the spatial approach to development and its approach to housing numbers. However, we have some concerns about the lack of flexibility in the Plan, the failure of the Plan to allocate sites in accordance with its identified spatial framework, and inadequacies / inaccuracies in its evidence base in relation to our client's site.</p> <p>3.2 We are particularly mindful that Councils are required to maintain a rolling five-year supply of housing land, and consider that this may be a challenge for the Council due to the sites it has selected for allocation. The deliverability of these identified allocated sites are key to ensuring sites are coming forward as anticipated in the Plan.</p> <p>3.3 There is currently a continued reliance on sites that have not yet delivered and are therefore retained allocations from the current Core Strategy and Site Allocations DPD; or large strategic sites where delivery is likely to be slow.</p> <p>Windfall allowance</p> <p>3.26 We note that the draft Plan makes provision for 140 windfall dwellings per annum. That is not an insignificant figure, and although it is acknowledged that there has been some past experience of windfalls at that level, it is apparent from the limited brownfield site availability that in order to reach these figures each and every year over the plan period will be challenging.</p> <p>3.27 To exemplify the level of existing commitments in that regard, paragraph 6.16 of the draft Plan notes that "<i>Existing permissions for housing on non-allocated sites will also contribute to supply. Over 1,958 units on windfall sites, those not specifically identified in the development plan, already had permission or prior approval for permitted development at 31 March 2022.</i>"</p> <p>3.28 There is of course no guarantee that these 1,958 dwellings will be built out. The absence of evidence setting out the status of these PD conversion and other windfalls is concerning, given the Plan's reliance on them. We reserve the right to comment on these in detail in future, but for such a significant component of housing supply, the Council must be able to demonstrate delivery of ALL of these homes, as there is no buffer built into the Plan to accommodate non delivery.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wallis Trustees (Represented by Carter Jonas)
Consultee Full Name	Frank Wallis Estate Trustees
Consultee Organisation	Wallis Trustees
Agent Full Name	Steven Sensecall
Agent Organisation	Carter Jonas
Comment ID	PS1382
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We welcome the Council's decision not to include demolitions or empty homes as contributing in some form to the housing supply, given that neither will be a significant source. However, concern is raised with the assumption of 1,949 dwellings coming from windfalls. Carter Jonas advocate that windfalls should not be included as a source of supply and should be seen as a bonus over the plan period as part of the Government's policy to substantially boost the supply of housing. Furthermore, it is considered that the Council's calculation for the windfall allowance is skewed owing to the long-term average period that has been used to inform the allowance. While there is evidence to support a small site windfall allowance, the calculation should be reduced to be more realistic of housing delivery from this source.</p> <p>Table 2 and paragraph 6.21 onwards of the Local Plan Review identifies the sources of supply to suggest that the overall cumulative total requirement is 9,146 dwellings and that there is an existing supply of 7,337 dwellings requiring a further 1,809 dwellings to be found. Policies SP13-15 provide additional housing supply on newly allocated sites of 1,720 dwellings (including the North East Thatcham allocation for approximately 1,500 dwellings) to be delivered within the plan period. Owing to the scale of the strategic allocations, the delivery rates from these sites will not materialise until the second half of the plan period. In the absence of a buffer for the possibility that windfalls may not arise, or extant permissions are not delivered, the housing requirement will not be met. This does not represent positive planning and is therefore unsound.</p> <p>Additionally, there is a concern that the authority's housing land supply will be on the cusp of five years at the time of the plan's adoption. In order to provide a more robust housing land supply in the early part of the plan period the Council should reconsider the sources of housing land supply and include more small and medium sized sites in the plan. This would assist in ensuring that the plan complies with NPPF paragraph 69 in that 10% of the housing requirement is delivered on identified sites of less than one hectare. Currently it is unclear whether the NPPF's requirement has been achieved therefore it is recommended that further residential allocations are made to ensure a more certain 5-year housing land supply exists on plan adoption.</p> <p><u>Unmet housing needs</u></p> <p>Furthermore, it is noted that Reading Borough Council have identified a shortfall of 230 dwellings that is anticipated to arise in the latter part of their current Local Plan period (the plan considers the period through to 2036) and it is understood that the shortfall was calculated against the now dated Berkshire Strategic Housing Market Assessment of February 2016. The agreed Statement of Common Ground with the local authorities that make up the Western Berkshire Housing Market Area (Bracknell Forest, Reading, West Berkshire and Wokingham) for the purposes of local plan making recognises the principle that Reading's need should be met within the West Berkshire area. Reading have identified that a 5-year review is required by 2024 and that it will need to consider how to deal with the housing needs generated by the standard methodology. The West Berkshire Housing Background paper confirms that:</p> <p><i>"Though the principle of meeting any unmet need within the HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises."</i> (Para 2.24 Housing Background Paper January 2023)</p> <p>Whilst the draft Local Plan Review reiterates NPPF Paragraph 61 that <i>"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for"</i> the housing provision of between 513 (local housing need) and 538 dwellings (local housing need plus 5% buffer as required by NPPF Paragraph 74) does not include for Reading's unmet need. It is therefore recommended that the housing number provision over the plan period should be between 528 and 554 dwellings per annum, 8,976 to 9,418 dwellings for the period 1st April 2022 to 31st March 2039.</p> <p>Whilst it is proposed that consideration of addressing Reading's housing shortfall will not take place until a future time, provision should be made now in the West Berkshire Local Plan Review to ensure that additional sites are planned for to meet this identified future need. West Berkshire's approach is contrary to NPPG paragraph 2a-010-20201216 as, in the knowledge of Reading's need, to ensure the plan is positively prepared, there should be provision in the West Berkshire Local Plan Review now to meet that need. Not allocating sites for Reading's need now renders the duty to cooperate futile as the cooperation has not resulted in a positively prepared plan with an effective outcome, i.e., accommodating Reading's housing shortfall. In addition, by deferring the allocation of sites to address Reading's unmet need renders the plan ineffective.</p> <p>Additionally, Carter Jonas would suggest that a buffer of additional sites is applied so that sufficient flexibility is included into the Plan to ensure the housing requirement and the economic aspirations of the plan can be met. The use of such a buffer is two-fold: a) to conform to national policy the housing requirement should be identified as a minimum (to ensure a boost in supply and to represent positive planning) it is prudent therefore for the Plan to seek to exceed that target; and b) a buffer will provide a balance against non-delivery or under delivery. It is considered therefore that the Plan should identify more sites.</p>

	<p>It is evident from the Housing Trajectory 2022/23 – 2038/39 (Housing Background Paper January 2023) that there is a significant shortfall anticipated in housing completions for the year 2026/27 owing to the lag for the strategic allocations to come through. Whilst there is an assumed recovery in completions for the period 2027 – 2032 anticipated to meet the housing requirement of 538 dwellings per annum (Local Housing Need 513 dwellings per annum plus NPPF required 5% buffer), it is noted that after 2032 the Council does not anticipate meeting its housing requirement for the remainder of the plan period. Furthermore, after 2036/37, the housing trajectory suggests that both the Plan's overall housing requirement and the annual requirement, which takes into consideration past / projected completions, will not be met. It is therefore considered that the Plan is unsound as it has not been positively prepared for the plan period.</p> <p>Advice from the Local Plan Expert Group recommends that a buffer of allocated sites should be set to around 20%. Therefore, the Plan as drafted should include for new residential allocations for at least around 2,171 dwellings over the plan period to ensure the housing requirement is met. This equates to a minimum of 646 dwellings per annum, against the 538 dwelling identified figure. If Reading's unmet need were included in the additional 20% calculation and spread across the plan period, the annual housing requirement would amount to 662 dwellings per annum.</p> <p>It is encouraging that the Council have responded to concerns raised at North East Thatcham (Policy SP17 North East Thatcham Strategic Site Allocation) in relation to environmental and highways impacts and given more consideration to the draft allocation by reducing the proposal from 2,500 dwellings at the Regulation 18 stage down to 1,500 dwellings at Regulation 19. However, the draft policy's supporting text suggests that further detailed studies need to be undertaken, including landscape and visual impact assessment in relation to potential impact on the AONB, suggesting that the site's capacity could be further reduced in this sensitive location through refined detailed assessment.</p> <p>In order for the assessed housing need over the Plan period to be fully realised it is recommended that additional residential sites are allocated to make up the likely shortfall created by this additional refinement. Whilst acknowledged by the SA (page 38), "<i>the [reduced] scale of the site will mean that more additional sites will need to be allocated across the district</i>". However, as the standard method illustrates a decreasing population, additional residential allocations have not been made.</p> <p>The district's decreasing population could be seen as an indicator that, owing to the district's house prices being higher than the average for England, people are choosing to live where it is more affordable elsewhere. This is likely to have an economic impact on the district through the inevitable 'brain drain' and the ever-increasing aging population of the district due to the authority's inability to retain the younger generations.</p> <p>In the absence of these additional technical studies and the time required to obtain a deliverable planning consent, it is unlikely that the 1,500 dwellings at North East Thatcham will be provided in the plan period. Therefore, additional sites should be allocated now to ensure that the Council's housing need is met in full over the lifetime of the Plan.</p> <p>It is noted that the evidence base for assessing the local housing need and demand consists of the Berkshire (including South Bucks) Strategic Housing Market Assessment (2016) and a slightly more recent sensitivity report of March 2018. The 2016 SHMA considered that the local housing need requirement was for an average of 665 new dwellings a year for the period 2013 to 2036 which was reduced by the 2018 sensitivity report to 600 dwellings per annum.</p> <p>Whilst the Local Housing Need Assessment is the starting point for plan-making, there may be circumstances where the Council must plan for a higher level of housing needs. The NPPG confirms at paragraph 2a-024-20190220 that "<i>An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.</i>" The Council's evidence indicates that there is a need for at least 330 affordable and social rented homes per annum, which is approximately 60% of the council's housing requirement. Owing to the majority of the affordable homes being delivered through the allocation of market housing there is justification for a higher housing requirement.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Wasing Estate (Represented by Pro Vision)
Consultee Full Name	The Wasing Estate
Consultee Organisation	The Wasing Estate
Agent Full Name	Sarah Pyne
Agent Organisation	Pro Vision
Comment ID	PS1757
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:35:00
Attached Files	Pro Vision (Wasing Estate) App 1 (BRIM1 Pro Vision (Wasing Estate) App 2 (ALD5).pdf Pro Vision (Wasing Estate) App 3.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Draft Policy SP12 explains that provision will be made for 8,721 to 9,146 net additional homes for the period 1 April 2022 to 31 March 2039. It is acknowledged that the target figure of 538 dwellings per annum (dpa) does not constitute a ceiling or cap to development. The target figure of 538 dpa is a 5% uplift on the local housing need (LHN), as calculated using the standard method.</p> <p>In this regard, we note that the Regulation 18 version of the West Berks LPR included a 10% buffer/uplift, but that this has been reduced to 5%, as set out within the Housing Background Paper, to provide a balance between boosting housing supply in the district while considering the limitations and constraints of a largely rural district (paragraph 2.33).</p> <p>The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district without harm to those constraints. Indeed, none of the key environmental constraints (e.g AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt etc.), but instead will shape the form and direction of growth across the district via the broad spatial strategy. As such, there is no justification to identify such a reduction in housing growth during the plan period on this basis, particularly as there appear to be sufficient sites available in the HELAA to accommodate further growth. As such, it is considered that the level of housing currently proposed is insufficient to support the Government's objective of significantly boosting the supply of housing.</p> <p>It is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039. This level of housing will ensure sufficient flexibility to deliver the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire.</p> <p>In respect of housing supply, it is concluded that to be positively prepared and sound, the LPR should be allocating more sites for housing over the plan period and we refer back to the comments above in respect of the settlement hierarchy and the council's approach to allocating new sites for development. It is considered that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy, and noting that many available sites in the 'smaller villages' with a defined settlement boundary have been overlooked contrary to paragraph 79 of the NPPF.</p> <p>Conclusion</p> <p>In conclusion, The Wasing Estate have concerns over a number of the policies as drafted, and overall consider that the plan is not consistent with national planning policy, and particularly the council's strategy and approach in respect of new housing and employment development has not been fully justified. The LPR does not identify sufficient residential or employment sites to meet the district's housing and employment needs. Furthermore, as drafted a number of policies do not provide adequate flexibility and support to existing rural businesses to achieve a prosperous rural economy in West Berkshire. As a result, the Plan is not sound and should be modified to address the concerns in this letter prior to submission.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Appendix 1 - Reg 18 consultation BRIM1 and BRIM2 • Appendix 2 - Reg 18 consultation ALD5 • Appendix 3 - Letter relating to ALD5
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1822
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 19:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Table 2:</p> <p>Notwithstanding our comments on the overall housing figure in respect of Policy SP12 we wish to raise a specific objection to "Table 2 – Housing Supply at March 2022". (Previously 2020).</p> <p>This Table has deleted "Allocations without permission" and instead increased the windfalls.</p> <p>In detail, and in particular under sites in Lambourn at policies HAS 19 and 20, and in separate representations we have explained why two sites included in the previous Plan have not come forward and should be deleted. We are pleased to see that the Sandleford Park and in particular "HSA DPD sites" which were to supply a total of 1,482 dwellings have been deleted.</p> <p>However new/additional sites need to be allocated to meet the housing need/requirement.</p> <p>In addition to have a quarter of the sites as uncertain windfalls (1,949 of 7,337), apparently some 74% of the total, is wholly unacceptable and does not supply the certainty required from a Plan under the NPPF.</p> <p>Additional sites should be allocated to provide the certainty expected of a new Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	Please see other submissions on this specific point <See Rep ID: PS1170>
<p>4. Proposed Changes</p>	<p>Provide adequate housing to meet the need/requirement.</p> <p>Re-examine HSA LPR Sites to see whether they are still available and can be developed and, if not find additional, replacement sites which should include our Client's site LAM007 "Land between Folly Road, Rockfel Road and Stork House Drive"..</p> <p>Reduce the element of windfalls in the Draft Plan from the high level of one quarter of all sites</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	Yes

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	We do not consider the LPR is sound and would like to participate in the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS1810
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park South (SPS)</p> <p>On behalf of our Client, Donnington New Homes (DNH), I write in response to the Council's current consultation on the emerging West Berkshire Local Plan Review 2002-2039.</p> <p>As the Council will be aware our Client controls land south of the existing Core Strategy allocation at Sandleford Park (Policy CS3). These representations follow the previous submission made by our Client in 2013 (for inclusion in the Strategic Housing Land Availability Assessment (SHLAA)); in 2017 in response to the Council's Call for Sites (HELAA); in 2018 in response to the Council's Local Plan Scoping Report and Sustainability Appraisal; later in 2018 in response to the Regulation 18 West Berkshire Local Plan Review to 2036; in November 2020 as an update to our original HELAA Call for Sites submission, and in February 2021 in response to the consultation carried out by the Council on its Regulation 18 Local Plan Review.</p> <p>Housing Need and Supply</p> <p>Paragraph 20(a) of the NPPF states strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for, inter alia, housing (including affordable housing). On 22 December 2022 the Department for Levelling Up, Housing and Communities published for consultation proposed amendments to the NPPF. The transitional arrangements in the proposed revised Annex to the NPPF make it clear that the dWBLP will be assessed against the test of soundness as outlined in paragraph 35 of the NPPF published in July 2021. In other matters, until the proposed revisions to the NPPF are made, the dWBLP should proceed on the basis of existing national policy and guidance.</p> <p>Strategic Objective 2 of the Proposed Submission Plan is: -:</p> <p><i>"To provide a range of sites to ensure that the District's housing needs and aspirations are met by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations."</i></p> <p>Policy S12 of the dWBLP sets out the minimum housing requirement for the Council as 513 dwellings per annum (dpa) for the for the period 1 April 2022 to 31 March 2039; resulting in a total requirement of 8,721 dwellings. The figure of 513 dpa is calculated using the Government's Standard Methodology (SM) as set out in the NPPF and the accompanying Planning Practice Guidance. The figure of 513 dpa corresponds with that calculated by Pegasus Group in accordance with the SM and latest available data. The Planning Practice Guidance (PPG) (<i>Footnote: Paragraph: 010 Reference ID:2a-010-20190220</i>) explains that the SM should be considered as a starting point and that the level of need should be informed by local conditions:</p> <p><i>" The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."</i></p>

It goes onto outline circumstances where this may be appropriate:

.... include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

The West Berkshire Housing Needs Assessment Update (WBHNAU) prepared by Icen Projects Limited on behalf of West Berkshire Council in July 2022 concluded that there are at present no reasons to increase housing supply above that calculated using the Standard Method.

Housing Requirement Buffer

Policy S12 of the dWBLP expresses the housing requirement as a range, with an additional 5% above the LHN (rounded to 538 per annum) made to be in accordance with the Government's objective of significantly boosting the supply of homes as set out in the NPPF. Paragraph 6.10 of the dWBLP states that:

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

The inclusion of such a buffer helps to ensure that the LHN as a minimum is delivered within the Plan period. The inclusion of a buffer is supported in principle by Donnington New Homes. However, concern is raised as to the extent of the buffer planned for in the dWBLP. Although there is no national guidance regarding the extent of any buffer, it is common practice in local plans to have at least a 10% buffer to ensure the minimum housing requirement is met, should the sources identified in the Plan not come forward as expected.

The approach to housing delivery was assessed through the Sustainability Appraisal (SA) as part of the Plan making process and published alongside the dWBLP. As well as ensuring the Plan meets the NPPF's objective of boosting the supply of housing, the SA recognises the need for some flexibility above the LHN figure to take account any changes to the LHN and allow for phasing issues and an element of non-delivery of sites.

Two reasonable alternatives were considered in the SA, namely meeting the Local Housing Need (LHN) figure and LHN plus a buffer. The two reasonable alternatives were then subject to SA/SEA.

The Regulation 18 consultation considered a buffer of 10% to help to boost supply and provide Flexibility. However, in response to the comments made as part of the Regulation 18 consultation a buffer of 5% was also considered for the production of the Regulation 19 dWBLP. This lower buffer was considered on the basis that "it would also provide a degree of flexibility helping to provide flexibility and a boost to the supply, while taking into account the constraints seen across the district". These two options, along with the baseline LHN were then subject to SA/SEA.

All three options were assessed as having an overall positive effect against the SA objectives. However the LHN+10% buffer was assessed as having 'an overall positive effect with some significantly positive effects'. In particular, the LHN+10% buffer option would significantly help to support the economy.

The SA concluded that all three options would have a negative effect on two of the SA objectives:

- 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced, and
- 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire

However, in relation to the above objectives it was noted that with mitigation the impact should be neutral for all three options. It is therefore, surprising that the Council progressed on the basis of the lower buffer option of +5% for determining the housing requirement when there were no additional negative effects from the option of using the LHN+10% buffer, and indeed the higher figure would provide some additional significant positive benefits.

Unmet Needs of Reading

Paragraph 11b of the NPPF specifies that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

The Reading Local Plan was adopted in November 2019 and includes a housing need of 16,077 homes (699 pa) for the period 2013-36, of which 230 (unmet need) are to be provided elsewhere in the Housing Market Area.

The Duty to Co-operate was introduced by section 33A of the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011. It places a legal duty on local planning authorities, county councils and prescribed public bodies to work together on strategic cross boundary matters. The Localism Act states that the 'duty' requires that engagement should occur constructively, actively and on an ongoing basis during the plan making process and that regard must be given to the activities of other authorities where these are relevant to the local planning authority in question.

Two of the four tests of soundness of local plans (NPPF Paragraph 35) directly relate to the Duty to Co-operate: Plans must be:

- *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*

• *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.*

Planning Practice Guidance (PPG) at Section 61, paragraphs 09-28, includes specific guidance on the production, scope, and content of Statements of Common Ground. West Berkshire Council published a Duty to Co-operative Statement in January 2023. It refers to and includes a Statement of Common Ground (WBCSoCG) published in August 2021, and signed by representatives of Bracknell Forest, Reading, West Berkshire and Wokingham Councils.

The WBCSoCG refers to A Memorandum of Understanding that was originally signed by these four Berkshire authorities in October 2017. This recognised the level of unmet need and agreed that the West of Berkshire area should meet its housing needs in full. This was replaced by a revised Memorandum of Understanding signed in August 2021. The Western Berkshire authorities have agreed through the Memorandum of Understanding that Reading's existing unmet need of 230 dwellings (based on the current development plan) is a collective responsibility and will be met within the HMA through flexibility included in emerging plans. It goes on to say that no authority is required to increase the minimum housing requirement or identify specific sites. However, this agreement relates only to Reading's need as calculated by the SHMA, not by any alternative calculations of need, which will need to be subject to separate discussions.

The Memorandum of Understanding states the identified 230 dwellings unmet need is likely to affect the planned level of housing provision in the latter part of the plan period, from 2026 to 2036, and will not therefore need to be accommodated in the short term. There is no specific identification of site(s) to meet the identified 230 dwellings of the unmet need of Reading, nor inclusion within the housing requirement of any adjacent authority. Policy SP12 of the dWBLP therefore does not include any provision for meeting the unmet needs of Reading.

Paragraph 6.7 of the dWBLP addresses the needs of Reading as calculated using the SM:

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

A review of the Reading Local Plan should take place by November 2024. The Reading Local Development Scheme (LDS) has not been updated from that published in November 2016 and there is no indication of a timetable to review the Local Plan. Given the lack of progress since the adoption of the Reading Local Plan in 2019 the prospect of a new Plan being adopted by November 2024 is extremely unlikely. Furthermore, housing delivery within Reading has fallen below the expected amount. Between 2013 and 2022 a total of 5,853 dwellings were completed in Reading Borough as compared to the annualised total of 6,201 representing a shortfall of 348 homes.

Reading is identified as a 35% uplift urban local authority in the 2020 revised Standard Methodology for Housing Need. The current figure for Reading based on the Standard Methodology is 907 dpa; an increase of 32% on the adopted Local Plan figure. If this is applied to the remainder of the Plan period 2022 to 2036, the need increases by 3,052 above the Adopted Plan figure.

The approach of the Western Berkshire authorities is to challenge the extent of the housing needs of Reading and to delay any resolution to meeting that need for as long as possible.

As an unmet need was identified in the 2036 Reading Local Plan, it is highly likely that a continued unmet need will be identified for the subsequent Review of the Reading Local Plan, particularly given the higher local housing need figure outlined above. Once established in the Revised Reading Local Plan, the adjacent authorities will need to accommodate this need in their own local plan reviews. In the case of West Berkshire this will not be until 2028 at the earliest and more realistically 2030 at best. In total therefore a period of 8 years will have elapsed since the housing need was established before it is effectively met. The total shortfall would be 1,557 homes over that period.

The West of Berkshire Authorities should be planning now to meet the future unmet needs of Reading Borough, including a realistic assessment of the proportion that can be met within West Berkshire, rather than deferring this contrary to the requirements of paragraph 35c of the NPPF. The dWBLP should be flexible enough to accommodate, at least in part, some of that unmet need.

Housing Delivery

The Council's Five Year Housing Land Supply Statement (November, 2022) claims a 6.4 year supply against the LHN figure of 513 dpa for the 5 year period commencing at April 2022. It should be noted that none of the proposed new allocations in the dWBLP are forecast by the Council to commence before April 2027. However, as the Plan is unlikely to be adopted before April 2024 it is necessary to assess the likely five year housing land supply at that point.

The housing trajectory presented in the Housing Background Paper shows there will be a nominal shortfall of 434 dwellings against the housing requirement of 538 + 5% buffer (*Footnote: As per paragraph 74 of NPPF*) for the period 2024 to 2029 before any oversupply in the first two years (*Footnote: 'Oversupply' 2020-22 = 1,177*) of the Plan period are taken into account, resulting in a 4.23 year supply. Should the oversupply be accounted for across the remaining plan period (*Footnote: The inverse 'Liverpool' method*) the shortfall would reduce to 61 and result in a 4.89 year supply. However, if the shortfall is accounted for in the first five years of the plan following its adoption (*Footnote: The inverse 'Sedgefield' method*) there would be a surplus of 684 dwellings and a 5 year supply of 6.21 years.

Whilst it currently falls to a matter of planning judgement as to which of these three approaches should be used, it is clearly open to a decision-maker to conclude that at the point of adoption the Council will be unable to demonstrate a five-year land supply. Therefore, additional sites capable of delivering early in the plan period would ensure that a five year land supply will be able to be demonstrated on any basis.

Housing Needs and Supply Conclusions

	<p>The above analysis highlights shortcomings in respect of housing provision in the dWBLP as follows:-</p> <ol style="list-style-type: none"> 1. an insufficient buffer to allow for flexibility and ensure the LHN is met in full over the Plan period, 2. a higher housing requirement by increasing the buffer can be made with no additional negative affects against the Sustainability Appraisal objectives, and indeed would provide additional positive benefits 3. the current unmet needs of Reading are not adequately provided for, 4. the likely future unmet needs of Reading should be planned for now, and the dWBLP should include flexibility to allow for the provision of that need as part of the Duty to Co-operate, 5. there is a clear case for an uplift to the housing provision to account for the identified affordable housing needs of the area, and 6. a potential shortfall in the five year housing land supply from the intended date of adoption of the plan if the oversupply is not accounted for in the five years following adoption
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1310
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS	E-Mail

* Web * Unknown	
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>HELAA sites for previously developed land</p> <p>Paragraph 119 of NPPF states: "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land."</p> <p>Paragraph 6.20 of the draft Local Plan states: "Any future windfall sites of 10 units or more are not included in the calculations of future supply, which introduces flexibility and means that any allocations of medium or large sites within settlement boundaries will not result in any double-counting."</p> <p>The availability of larger sites will vary. The cut-off of 10 units is arbitrary, and not based on proportionate evidence for each site. It also appears to exclude such sites from inclusion in the brownfield register, or from being included in the Local Plan as a non-strategic policy.</p> <p>This approach to calculation of future supply will artificially reduce the estimation of the contribution that will be made from previously-developed or 'brownfield' land, and therefore artificially inflate the estimated requirement for homes on developments on greenfield sites.</p> <p>This approach will skew planning decisions towards development on greenfield sites, and away from brownfield sites – especially as the brownfield sites will not be identified though non-strategic policies in</p>

	the local plan, or perhaps even by not being included in the brownfield register. This is contrary to the policies of NPPF. One site that appears to have suffered from this flawed approach is THA21; Newbury Leisure Park, Lower Way, Thatcham.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	The assessment of availability of sites on previously developed land should be assessed individually, rather than using an arbitrary upper limit of ten units.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst NDP Group
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst NDP Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1731
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We note that this section describes how 513-538 dwellings per annum will be provided from existing planned developments, windfall within settlement boundaries, the defined sites and allocations within named neighbourhood plans. Whilst we understand these numbers are not a limit, it is good to see that no further development is necessary outside settlement boundaries to meet the anticipated housing need and that the plan delivers the anticipated need. It is also reassuring to see that windfall sites of 10 units or more are not included in the calculation of future supply, so there is no need for large-scale development within settlement boundaries.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincent's Lane (Represented by TOWN)
Consultee Full Name	Pincent's Lane
Consultee Organisation	Pincent's Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1353
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincent's Lane) Full Rep.pdf TOWN (Pincent's Lane) App 1. Land ownership plan.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Context: Background to these representations</p> <p>These representations into the West Berkshire Local Plan Review 2022-39 consultation (R19 LPR) are submitted by TOWN on behalf of the landowners of Land East of Pincents Lane, categorised as TIL13 in the West Berkshire Housing & Economic Land Availability Assessment, HELAA.</p> <p>The site is wholly owned by two landowners:</p> <ul style="list-style-type: none"> • U+I (Pincents Lane) Ltd; a wholly owned subsidiary of the U+I Group, itself now owned by Land Securities, the UK's largest Real Estate Investment Trust – owing around 86% of the site; and • Alasdair Barron, Barbara Barron and Cilla Platt – who together own around 14% of the site. <p>The extent of the site and respective landownerships is shown in the plan at Appendix 1.</p> <p>The majority of the site (shown in dark green in the plan at Appendix 1) is a former ninehole golf course which closed in the 1990s. The remainder is used for grazing by horses.</p> <p>These representations are submitted by TOWN, a multiple award-winning developer and development manager. The professional team which helped prepare the representations comprises:</p> <ul style="list-style-type: none"> • Tetlow King – Affordable Housing Advisers; • Pell Frischmann – Highways and Transport Planning; • Civic Engineers – Civil Engineering, specifically flood risk; • Node – landscape and masterplanning. <p>Approach to Housing Delivery</p> <p>It is recognised that R19 draft policy SP12 provides for the provision of the Local Housing Need (LHN) figure as a minimum – and the calculation of LHN includes an adjustment for market factors. Nevertheless, an increase in the suggested buffer from 5% to 10% would assist in addressing the widening affordability challenge in West Berkshire in general, particularly adjacent to Reading itself.</p> <p>Providing a mix of sites</p> <p>NPPF paragraph 69 notes that “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.” Sites in the eastern part of the WBC area, which are free of infrastructure or planning constraints, should therefore be at a premium to offset both the bias towards large-scale sites in the western part of WB and to maintain the plurality of offer.</p> <p>It is noted from Table 2 that there is a heavy reliance on unallocated sites:</p> <ul style="list-style-type: none"> • Existing planning commitments on unallocated sites = 1,958 • Windfall allowance to 2039 = 1,949 units <p>Thus, a total of 3,907 units out of the total 7,337 or a total of 53% of dwellings are proposed to be met from sites which are not allocated in the plan. Such a high percentage is inappropriate and not in accordance with national policy. Additional sites should be allocated, particularly in the east of WB.</p> <p>Finally, it is noted that these unallocated and windfall sites tend to be smaller ones which offer only lower delivery rates for affordable housing by virtue of the national exemption and further representations against the reliance on a small number of large-scale urban extensions is made in the responses to policy SP13 below.</p> <p>Conclusion</p>

The reliance of the LPR on a few very large strategic developments in the west of West Berkshire, in the control of a small number of promoters and housebuilders, threatens its soundness measured against the tests set out in the NPPF. Namely, it cannot be said to be:

- 1 Positively prepared – since it is not informed by agreements with other authorities, and is not consistent with achieving sustainable development;
- 2 Justified – since it ignores the requirement for sites in the part of the Council area closest to Reading;
- 3 Effective – is not deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been deferred, as evidenced by the statement of common ground; and
- 4 Consistent with national policy – will not deliver sustainable development due to the encouragement of unsustainable travel patterns in relying on development in the west of WBC.

Outside of this imbalanced spatial strategy, challenges to the soundness of the R19 LPR have been demonstrated in respect of:

- A failure to meet the Duty to Co-operate, specifically in respect of addressing the shortfall of unmet need arising in Reading;
- A failure to assess the risk of flooding correctly through the SFRA and Sequential Test;
- An over-reliance on unallocated and windfall sites contrary to national policy;
- Concerns about the ability of the strategic sites at Sandford and North East Thatcham to deliver quickly and to the numbers proposed in the plan period;
- A fundamental need to allocate more sites in the east of WB, adjacent to Reading;
- A failure to allocate sites to meet the high demand for affordable housing across WB and in the east in particular; and
- Focusing growth reliant on the use of M4 junction 13 whilst capacity exists for development to be served at junction 12.

Attachments:

- Full Rep
- Appendix 1 - Landownership Plan

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

No

Please give reasons for your answer

Assessing soundness of the plan: The Duty to Co-operate

In order for the WBC LPR to be found sound, it must accord with the four tests of soundness set out in NPPF 2021 paragraph 35, which are:

- 1 Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs²¹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 2 Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3 Effective – deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- 4 Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

And:

Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of this Framework.

The Duty to Co-operate is a legal requirement under section 33A of the Planning and Compulsory Purchase Act 2004 for which guidance is set out in NPPF 2021 paragraphs 24-27.

The four LPAs which make up the Western Berkshire Housing Market Area, including WBC and Reading Borough Council, signed an updated Statement of Common Ground for Local Plan Making in August 2021.

That SoCG (paragraph 4.5) recognises a shortfall of 230 dwellings in total for Reading BC's area, or 10 per annum over the plan period (to 2036). This shortfall derives from Policy H.1 of the adopted Reading Local Plan, November 2019, which states:

H1: PROVISION OF HOUSING

Provision will be made for at least an additional 15,847 homes (averaging 689 homes per annum) in Reading Borough for the period 2013 to 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 230 dwellings that cannot be provided within Reading will be met over the plan period.

Paragraph 4.4.6 develops the issue of the shortfall:

Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 230 dwellings when considered against Reading's need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market Area. The other three authorities within the HMA recognise that there will be issues with Reading's ability to accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up⁷⁵. There will be continuing dialogue on this matter between the affected authorities which will inform local plans. Where agreement is reached, it will be for individual authorities' Local Plans to specify where development will be located.

	<p>Where: <Link to Bracknell Forest West Of Berkshire Spatial Planning Framework></p> <p>In principle, therefore, the shortfall of 230 dwellings must be met within the West of Berkshire Area. Policy H1 envisages that individual Local Plans will specify where development will be located yet there is no such specification or allocation in the WB R19 LPR. Indeed paragraph 1.28 of the R19 LPR is silent on Reading's unmet need. The SOCG contains out an important caveat:</p> <p><i>"... it is important to note that this agreement relates only to Reading's need as calculated by the (West of Berkshire SHMA) not by any alternative calculations of need, which will need to be subject to separate discussions." (footnote 1)</i></p> <p>Although the 230 dwelling shortfall is a product of the SHMA, it has been examined and is now embedded in policy H1 of Reading's adopted local plan.</p> <p>Reading BC's area need is due to be calculated by the end of December 2024 using the standard method (or any other calculation which applies at that time), yet there is no evidence of any separate discussions with regard to this.</p> <p>There is no agreement between the four LPAs on how this current shortfall might be met across the HMA. Furthermore, RBC will face an uplift in its figures of 35% as a result of it being one of the 20 most populous urban LPAs in England. Whilst there may be no requirement for adjoining LPAs to accept this element of unmet need it will still serve to increase the pressure on the HMA as a whole.</p> <p>Moreover, as recognised further in the WBC Duty to Co-operate Statement (footnote 2):</p> <p><i>The settlements in the Eastern Area – Purlley on Thames, Tilehurst, Calcot and Theale have a close functional relationship with Reading. Whilst many residents in this area use facilities and services in Reading, there is a significant movement the other way in terms of school children, with West Berkshire schools educating a significant number of Reading pupils.</i></p> <p>Without a clear and document agreement on how Reading BC's unmet need can be met across the HMA, and more specifically West Berkshire which shares its border with the Reading urban area, it is obvious that WBC has failed to meet the Duty to Co-operate tests. This means the R19 LPR is also not sound because it has not been positively prepared and is not consistent with NPPF 24-27.</p>
<p>4. Proposed Changes</p>	<p>The requirement to allocate more sites in the Eastern Area would address many of these challenges to soundness. Whilst it is acknowledged that some constraints do exist, there are sites which are recognised as achievable and deliverable in the Council's evidence base supporting the LPR. Prime amongst these is site TIL13 at Pincent's Lane (see overleaf).</p> <p>Site TIL13 has a long planning history. By common consent, the problems with the 2011 appeal scheme have been resolved and no technical obstacles exist to development of the site for a scheme of up to 165 dwellings. By the LPA's own assessment, the concerns – and the reasons for not proposing it for allocation – are entirely "political". No one would deny the validity of elected members making political choices where real choices exist, but the fact is that not allocating the site would leave the LPA without a single significant contribution to offer to meet either its own housing need in the Eastern Area or that arising from Reading, of which the Area is functionally part. The site should therefore be allocated.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Thakenham Homes</p>
<p>Consultee Full Name</p>	<p>Craig</p>

	Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1608
Chapter / Policy / Appendix Number	Policy SP 12
Chapter / Policy / Appendix Title	Approach to Housing Delivery
Order	39
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

* No	
<p>Please give reasons for your answer</p>	<p>Policy SP12 (Approach to Housing Delivery) – Thakeham is concerned that the housing target figures, including the dwellings per annum (DPA) figure have dropped since the previous Plan consultation. Previously, 8,840 to 9,775 net additional dwellings were provided for over the Plan period, which equated to approximately 575 dpa. This has now reduced to 8,721 to 9,146 additional homes over the plan period, or approximately 513 to 538 dpa. This is of concern particularly when existing housing allocations are appearing slow to build-out, and villages such as Lambourn are also considered to be allocated less housing than is required.</p> <p>Indeed, it is also noted that the Council suggest (paragraph 6.9) 513 dpa is a minimum and 538 dpa represents a 5% increase to support the Government's objective of significantly boosting the supply of homes. Whilst it is appreciated that the 538 dpa figure is stated as not constituting a 'ceiling or cap to development', Thakeham does not consider a range to be consistent with the NPPF. The current approach does not appear to be planning positively for existing residents. The purpose of housing delivery is to ensure there is sufficient housing being delivered to meet the needs of West Berkshire inhabitants. In the previous Local Plan period, West Berkshire has delivered 8,288 houses between 2006 and 2022 (2022 AMR). However, only 1,902 of these were affordable, or 23%. This exacerbates the affordability of housing, with the current ratio more than double the national affordability. In order to support more people to buy their own homes, there needs to be a higher provision of housing, which can in turn deliver higher percentages of affordable housing.</p> <p>Paragraph 6.12 and 6.13 (Retained Allocations) – It is of concern to note that despite the fact that the Core Strategy and Site Allocations DPD were adopted in 2011 and 2017 respectively, that there are still 2,652 outstanding units, which represents over 50% of the total homes allocated. This brings into doubt the deliverability of these allocations and further work would be undertaken to ensure that there is realistic chance of them coming forward. If there is any doubt, then they should not be considered 'available', and alternative Sites need to be included.</p> <p>As commented above, an example is Land adjoining Lynch Lane, Lambourn, where the last three AMRs make no comment on its status, just that '<i>at the current time no planning application has been received</i>'. If no update is forthcoming from the landowner or agent, then it cannot be considered to be 'available' and should be replaced by an alternative site (or supported by a reserve site). This lack of delivery is of particular concern where the allocation is the only significant housing site for a whole village, particularly one such as Lambourn identified as a Rural Service Centre.</p> <p>Paragraph 6.21 (Future Supply) – Thakeham is concerned that the Council no longer intends to provide allocations that exceed the housing shortfall, with paragraph 6.21 confirming that 1,809 dwellings '<i>need to be found</i>'. However, paragraph 6.22 confirms that proposed allocations will provide for just 1,720 dwellings, and paragraph 6.23 states that only 80 dwellings are now expected to be delivered from emerging Neighbourhood Plans (down from 315 in the previous consultation draft). This equates to 1,800 dwellings through new Local Plan allocations, and expected Neighbourhood Plan allocations. This leaves 9 dwellings unaccounted for, with no flexibility given for phasing issues or non-delivery as alluded to by paragraph 6.21. Whilst this does not take into account windfall sites, Thakeham does not consider relying on delivery of windfall sites to make up the remainder of housing need and provide a suitable buffer to be a sensible approach, particularly in a local authority that is heavily constrained by the AONB. To this end we note that the Council has concluded that at least 1,958 homes will come forward on windfall sites – around 20% of the overall supply. Thakeham suggests that in order to ensure that housing needs are met and not left to change, the Council should seek to allocate more smaller sites, as advocated by paragraph 6.9 of the NPPF.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes</p>	<p>Yes</p>

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 13 Sites allocated for residential and mixed-use development in Newbury and Thatcham

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Way, Joelle
Consultee Full Name	Joelle Way
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS32
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	06/02/2023 17:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<ol style="list-style-type: none"> 1 The number of homes allocated in the plan ignores the 500 - 1000 flats likely to be built in Newbury at the London Road Industrial Estate, that the council owns, and at a re-developed Kennet Shopping Centre. 2 The plan depends on 1,500 homes being built at Sandford, south of Newbury. This site was first allocated in 2012 and no houses have been built there yet. In fact only part of the site has planning permission and that was only granted recently. 3 The plan also depends on another site for 1,500 homes being allocated in north east Thatcham (in the corner formed by the A4 and Floral Way). As experience with the site at Sandford shows, large sites can be difficult to deliver.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Beal, Clive
<p>Consultee Full Name</p>	Clive Beal
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS52
<p>Chapter / Policy / Appendix Number</p>	Policy SP 13
<p>Chapter / Policy / Appendix Title</p>	Sites allocated for residential and mixed-use development in Newbury and Thatcham
<p>Order</p>	42

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 23:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I would like to know how many local residents are on the West Berkshire Planning committee? In my experience consultations of this type receive more attention from those likely to gain financially from proposed plans!! I have no doubt the plans take into account the additional schools, doctors and dental surgeries and retail park. However, the massive increase in number of motor vehicles will most definitely require a railway bridge in Thatcham and a north Thatcham bypass. To fully understand this need you need to be a local frustrated resident. Hence my first sentence. Thank you.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Musgrave and Begley, M&W (Represented by Fisher German LLP)
Consultee Full Name	Mr M and W Musgrave and Begley
Consultee Organisation	
Agent Full Name	Angela Brooks
Agent Organisation	Fisher German LLP
Comment ID	PS150
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 14:36:00
Attached Files	Fisher German obo MusgraveandBegley
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This consultation response has been prepared by Fisher German on behalf of our clients Mr M Musgrave and Mr W Begley in respect of their land adjacent to Oxford Road, Chieveley, as illustrated in the attached.</p> <p>The land, which extend to circa 6.58ha, is located to the east of Chieveley. The site is defined by residential development and Graces Lane to the south, Oxford Road to the east, residential development and East Lane to the north and a field to the west. The site benefits from mature boundary planting and forms a logical infill location close to the centre of Chieveley.</p> <p>These representations follow the order of the policies within the Submission Plan, wherein we have not commented we have no specific comments at this stage. If you have any questions regarding these representations, please contact the author.</p> <p><i>Extract of response relevant to consultation point:</i></p> <p>A critical part of the Council's supply equating to c30% of the housing requirement derives from two large scale allocations in Newbury and Thatcham; Sandlesford Park, Newbury (1,500 dwellings) and North East Thatcham (1,500 dwellings). We have a number of concerns relating to the reliance on these sites, as clearly if there were to be issues in delivering these strategic sites this would mean the Plan would significantly underdeliver against even base Local Housing Need, let alone any uplift, only delivering circa 6,146 dwellings assuming all other sites were delivered and the windfall rate was maintained.</p> <p>Sandlesford Park is a locally difficult site, with multiple applications refused in the previous five years. This impasse ultimately resulted in an appeal which was allowed last year, dissecting the site in two (Sandlesford Park East and West). The record of uncooperative working and multiple refusals leads to severe concerns on the timely delivery of an acceptable scheme. The housing trajectory within the background paper outlines that the Council anticipate delivery will commence in 2025/26 with 100 dwellings being delivered in each of the first two years (Sandlesford Park East). This increases to 150 units per annum once Sandlesford Park West comes on stream in 2027/28 and continuing until 2034/25 where development reaches an anticipated completion. We do not believe it is likely that the scheme will commence delivery in only 2 years from now, and that immediate delivery will be 100 units. Given there are currently no Reserved Matters applications pending and the difficulty associated with the site's development to date, we consider there remains a number of years before delivery will begin in earnest, having regard for the need to gain a planning permission, marketing, initial site works and infrastructure delivery. When delivery commences, we do not consider it likely that the first year of delivery will yield 100 dwellings. We also consider it unlikely that the site will deliver 150 dwellings per annum at its peak. Having regard for these factors, we consider it highly unlikely that the site will contribute positively to the</p>

	<p>five year supply on adoption, nor will be fully built out by the end of the Plan period. A shortfall of around 400 dwellings is anticipated at a minimum, though it could very reasonably be higher.</p> <p>North East Thatcham also has a chequered planning history, with the Council refusing an application for part of the site in February 2015, ref 15/00296/OUTMAJ, citing a multitude of reasons for refusal, including impacts on landscape. The applicants appealed this decision and following a public inquiry the appeal was to be allowed, due to Paragraph 14 of the NPPF being engaged owing to a lack of housing land supply, however the decision was called in by the Secretary of State who dismissed the appeal in July 2017, against the recommendation of the Inspector.</p> <p>The previous iteration of the Plan set out that 1,250 dwellings would be delivered over the Plan period. This has been increased to 1,500 without compelling justification. The trajectory assumes a start in 2029/30, which is considered to be more robust, given there is no current planning applications for the site and the sites history.</p> <p>As acknowledged by the Site Selection Background Paper (2020), there is a lack of evidence as to the ability to service the site and what works would be required to ensure that there is utilities capacity to deliver the site at the rate the site is expected to deliver. There is currently no comprehensive application for the delivery of the site, and it is unclear when one will be submitted. Given the various issues associated with the delivery of Sandleford Park, and the time taken thus far, it is vital that realistic and robust assumptions are made for the delivery of the North East Thatcham site.</p> <p>Again the trajectory assumes high delivery in the first year equating to 150 dwellings, continued thereafter. It is clearly not sensible to assume a strategic site will deliver 150 dwellings in its first year of delivery. Whilst this could normally be overlooked, to achieve the Council's target of 1500 dwellings within the Plan period, as set out in the trajectory, 150 dwellings are required annually from 2029/30 to 2038/39. Given the Plan period ends in 2038/39, any slippage automatically results in a reduction of the total number of dwellings delivered in the Plan period. Again, the ability to deliver 150 dwellings per annum continuously is challenged and 100 dwellings considered to be more robust. Assuming 100 can be delivered in the first year, which again is doubtful, this results in a shortfall of 500 units.</p> <p>Considering the above, the Council will entirely lose the proposed 5% buffer of c.400 dwellings and have a shortfall of overall housing land supply against the housing requirement of circa 500 dwellings. Additional allocations are therefore required to ameliorate this shortfall, and to reintroduce an acceptable buffer as the 5% assumes all other sites, and the windfall rate, will deliver as anticipated which is seriously doubted. Failure to respond positively to this issue should result in the Plan being found unsound.</p> <p><i>For full response please see attachment.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Rivar Ltd (Represented by Pro Vision)

Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS571
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:37:00
Attached Files	Pro Vision (Rivar) full response.pdf Pro Vision (Rivar) Ancient Woodland report.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

development in accordance with the policies of the NPPF.

* Yes

* No

Please give reasons for your answer

Please refer to our accompanying statement for our full representations.

Our assessment of the housing requirement and supply demonstrates that there is a need to allocate additional housing sites that is consistent with the broad spatial strategy.

Extract from full representation relevant to consultation point (for full response see attachment):

Land adjoining New Road, Newbury and Site Assessment

In the context of these concerns about the vulnerability of the submitted development strategy, and the obvious remedy to identify a greater yield of new homes from the available sites in the HELAA, we turn to our client's land which was removed as a preferred allocation ('Land adjacent New Road, Newbury (HELAA Ref: GRE6)')

Whilst the 'emerging draft' LPR included GRE6 as a preferred site allocation, it is not now currently selected for development in the proposed submission version of the Plan. The Council's HELAA (Dec 2020) concluded that the Site is 'potentially developable in part'. However, the Council's Updated HELAA (Jan 2023) now identifies that the Site is 'not developable within the next 15 years'. The Council contend that advice on ancient woodland has changed and, therefore, the site is no longer suitable for development. We disagree with this revised assessment/conclusion for the reasons set out below.

Accordingly, we are of the view that the Council should include our client's land, in addition to other sites that have been overlooked, for allocation in the Local Plan Review (this Rivar site alone will not remedy the issues we have identified).

Suitability of GRE6

The 'emerging draft' LPR included a draft site allocation Policy for 'land adjacent New Road, Newbury'. This confirmed that "detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements that will cover amongst others a buffer between the developable area and the ancient woodland that is situated to the west of the site, and access".

The Council's HELAA document now concludes that the advice on ancient woodland has changed and there is a need for a buffer greater than 15m. Overall, the HELAA concludes that 'the impact on the ancient woodland would be so great that the site is not suitable for development'. In respect of this, we comment as follows:

An assessment of the ancient woodland for Rivar was prepared in July 2022 by Sylvan Consulting and accompanies these representations. The assessment confirms that West Wood includes a number of indicator species plants supporting its very long term presence and, therefore, is suggestive of being ancient woodland (albeit, this could not be confirmed definitively).

The assessment acknowledges paragraph 180 c of the Framework and the Standing Advice jointly published by Natural England & Forestry Commission. The assessment concludes that a 15m buffer would be satisfactory alongside additional protective measures (e.g zero development in the buffer zone, avoidance of residential curtilage backing onto buffer and reinforcement of woodland edge) as part of the design scheme.

This approach to the ancient woodland is similar to that taken at the Sandleford Park East I and that was supported by the Inspector and Secretary of State in the recent appeal decision (Ref: APP/W0340/W/20/3265460). The Inspector accepted that a 15m buffer to the ancient woodlands was adequate, alongside other mitigation measures.

The assessment also identifies that there are current management challenges facing West Wood. As such, any development of the site could help secure a long-term management strategy of the woodland through a S106.

Overall, it is considered by the technical experts that with a 15m buffer, together with the additional protective measures and a long term management strategy, the overall effect of development would be 'significantly net-beneficial'. This therefore should carry significant weight in favour of re-allocating the site for housing, contrary to the Council's revised assessment in the HELAA.

An Illustrative Site Plan, at Appendix B (*see full response attachment*), demonstrates how the development of the site could accommodate 10 dwellings, as previously suggested by the Council. The proposed development will provide a minimum 15m buffer to the edge of the surrounding woodland and respect the significant trees within the site. It also ensures that residential curtilage is situated away from the buffer zone. The site would provide a mix of predominantly 2 and 3 bed dwellings and integrate with the surrounding residential development.

It is considered that developing the 'Land adjoining New Road, Newbury' remains a developable option for the following reasons:

- 1 There is a need to identify a range of sized sites for housing in West Berkshire to meet the indicative housing requirements during the plan period. Due to its modest scale, the Site can be built out quickly in accordance with paragraph 69 of the Framework.
- 2 The site is located in the 'Newbury and Thatcham Area' which is capable of accommodating significant levels of growth given the range of services and facilities it currently offers and is therefore a sustainable location for development.
- 3 The land has a strong relationship with the existing residential development to the north and follows the existing pattern of the settlement.
- 4 The site is visually well contained by existing woodland and trees which affords a degree of separation from the wider landscape.
- 5 An appropriate buffer (i.e. 15 metres) can be maintained to the Ancient Woodland (see above for further comments).

	<p>6 The site is not subject to any specific environmental or statutory designations such as Green Belt, Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI) and outside the DEPZ emergency zone.</p> <p>7 The site is located in Flood Zone 1 (i.e. low probability of flooding) and a sustainable drainage system would be provided.</p> <p>8 The site has access to local employment opportunities within Newbury, Greenham and beyond.</p> <p><u>Availability of GRE6</u></p> <p>The site is available for a residential development immediately. Rivar, as a local developer, has an option on the site which will facilitate its timely development.</p> <p><u>Achievability of GRE6</u></p> <p>The site is considered to be 'achievable' for the reasons set out below:</p> <ul style="list-style-type: none"> • A vehicular access can be delivered via New Road/Lamtarra Way. • The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds. • Rivar enjoys a reputation for building high quality homes in desirable locations throughout central southern England and is based in Newbury. In recent years, Rivar has delivered a range of different sized housing schemes across West Berkshire. It has a good track record of delivery. <p><u>Summary</u></p> <p>There are no insurmountable constraints that would prevent the delivery of the 'Land adjacent New Road, Newbury' (Ref: GRE6)' for development. Our specialist evidence indicates that the Council's conclusions in regard to ancient woodland are not well founded. The site is therefore suitable, available and achievable for residential development which can help West Berkshire meet the identified housing need in a timely and sustainable manner. Accordingly, we are of the view that the Council should consider the re-allocation of our client's site in the Local Plan Review.</p> <p>Alternatively, the site could be included in the settlement boundary given its modest scale. It is considered that character of this area clearly makes a greater contribution to the built form of the area; rather than the wider countryside. Such amendments to the settlement boundaries through the review provides an opportunity to proactively deliver small-scale sites to boost supply and to help meet the Council's housing targets during the plan period.</p> <p><i>For full response see attachment. Includes Appendix A - Site Location Plan & Appendix B - Illustrative Site Plan</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please see accompanying statement for our full representations.</p> <p>There is a need to allocate additional housing sites. Accordingly, we are of the view that the Council should reconsider allocation our clients' site at 'land adjacent New Road, Newbury', in addition to other sites that have been overlooked, for allocation in the Local Plan Review. There are no significant technical, physical, or environmental constraints that would prevent development of the site and its delivery. The specialist evidence indicates that the Council's conclusions in regard to ancient woodland are not well founded and, therefore, the site should be re-considered for allocation in the Plan.</p> <p><Full response attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Harry West Investments Ltd
Consultee Full Name	Harry West Investments Ltd
Consultee Organisation	Harry West Investments Ltd
Agent Full Name	Kay Collins
Agent Organisation	Solve Planning
Comment ID	PS396
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:20:00
Attached Files	Key Collins (Harry West Investments) Layout A Key Collins (Harry West Investments) Layout B.pdf Kay Collins (Harry West Investments) Dev. Appraisal
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Our client's site has previously been submitted for the Call for Sites process (Land at Stoney Lane, Newbury). The site is well located for access to Newbury where development is proposed to be focused within the emerging plan. It is, however, not included as an allocated site in Policy SPO13. It is close to the proposed allocation at Land at Coley Farm, Stoney Lane, Newbury (RSA3/HSA3)</p> <p>Alongside this previous submission, we include with this submission a Development Appraisal of the site as well as an Indicative Layout that has previously been submitted to the Council, but which shows potential options for layout of the site.</p> <p>I trust that this letter will be considered as representations duly made to the current consultation on the Local Plan. Should you require anything further at this stage do not hesitate to contact me.</p> <p><i>For Development Appraisal and Layout Plans see attachments.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Newbury Racecourse (Represented by Pro Vision)
<p>Consultee Full Name</p>	Newbury Racecourse
<p>Consultee Organisation</p>	Newbury Racecourse
<p>Agent Full Name</p>	Gareth Johns
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS527

Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:14:00
Attached Files	Pro Vision (Newbury Racecourse).pdf Pro Vision (Newbury Racecourse) Appendices.pdf Pro Vision (Newbury Racecourse) Illustrative Maps 2.pdf Pro Vision (Newbury Racecourse) Illustrative Maps 3.pdf Pro Vision (Newbury Racecourse) LVIA.pdf Pro Vision (Newbury Racecourse) Illustrative.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

Please give reasons for your answer

Please refer to our accompanying statement for our full representations.

Our assessment of the housing requirement and supply demonstrates that there is a need to allocate additional housing sites that is consistent with the broad spatial strategy.

Extract of full response relevant to consultation point

Land South of Newbury Racecourse and Site Assessment

In the context of these concerns about the vulnerability of the submitted development strategy, and the obvious remedy to identify a greater yield of new homes from the available sites in the HELAA, we turn to our client's land which has been overlooked ('Land south of Newbury Racecourse (HELAA Ref: GRE3)')

The Council's HELAA (Dec 2020) concluded that the Site is 'potentially developable in part'. However, the Council's Updated HELAA (Jan 2023) now identifies that the Site is 'not developable within the next 15 years'. There has been no obvious change in assessment of the site which justifies this change in status. We disagree with this revised assessment/conclusion for the reasons set out below.

Accordingly, we are of the view that the Council should include our client's land, in addition to other sites that have been overlooked, for allocation in the Local Plan Review (the Racecourse site alone is unlikely to remedy the issues we have identified).

The capacity of the site is around 160-170 dwellings. However, subject to further assessment (e.g. tree surveys) the capacity of the site could be greater. The evolution of the Masterplan has been landscape-led and informed by a comprehensive Landscape and Visual Impact Assessment (LVIA). Consequently, the proposed layout reduces the area of built development and enhances the existing green infrastructure to further integrate the development into the immediate and wider landscape.

An Illustrative Masterplan, at Appendix B <see attachment>, demonstrates how the development of the site could accommodate around 161 dwellings, as suggested by the Council. The proposed development will respect the edges of the surrounding woodland and the significant trees within the site. It avoids development on the more steeply sloping parts of the site and makes adequate provision for surface water attenuation. The aim is to integrate the development within its setting with pedestrian links to create a permeable environment.

Suitability of GRE3

The Council's HELAA document concludes that the 'there is low capacity for development due to the site being constrained by in a number of ways where any development would affect views and characteristics which would cause harm to the landscape. The Assessment therefore recommends that the site is not developed for housing.' In respect of this, we comment as follows:

A comprehensive LVIA, prepared by WH Landscape Consultancy Ltd accompanies these representations and were previously submitted to the Council as part of the consultation on the 'emerging draft' LPR in 2021. The LVIA assess the existing landscape to determine and describe the conditions against which changes resulting from the development can be measured or predicted and assessed. In response to the landscape conclusions of the Council's Site Assessment, the LVIA demonstrates that:

- Overall, the development will have an overall Moderate – Moderate/Minor effect, which is not considered significant under the LVIA methodology.
- There will be some localised benefits in respect of the enhancement of the current green infrastructure within and around the site. These benefits will be further enhanced by the proposed additional green infrastructure.

The HELAA identifies no 'showstoppers' that would prevent the delivery of the site for housing, including on heritage, ecology, drainage, traffic, air quality and the sustainability of the site.

Availability of GRE3

The site is available for a residential development immediately. The site is within the sole control of the Racecourse which will facilitate its timely development.

Achievability of GRE3

The site is considered to be 'achievable' (as defined in the HELAA Methodology 2016) for the reasons set out below:

- A primary access is achievable from Mandarin Drive/ Rosyth Gardens. The Racecourse's land extends to the highway boundary in this location and, therefore, an access from this location can be implemented. A secondary southern access can also be achieved from Greyberry Copse Road (albeit the technical evidence considers that this is not essential). An agreement has, in principle, been agreed with the landowner and the Racecourse expect to conclude a formal access agreement shortly allowing the secondary access if required.
- The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.
- The Racecourse have ample experience in selling sites to developers and delivering development at Newbury. There is also developer interest in the site.

Summary

There are no insurmountable constraints that would prevent the delivery of the 'Land south of Newbury Racecourse (Ref: GRE3)' for development. The site is therefore suitable, available and achievable for residential development which can help West Berkshire meet the identified housing need in a timely and sustainable manner. Accordingly, we are of the view that the Council should re-consider our client's site for allocation in the Local Plan Review.

Conclusion

Newbury Racecourse Plc. has concerns that the Council's Local Plan Review is currently unsound having regard to the tests of soundness at paragraph 35 of the Framework.

	<p>It is considered that there are a number of matters that indicate that the proposed strategy is not robust and, therefore, liable to fail in its objectives. There is justification to increase the housing requirement, to address these issues including:</p> <ul style="list-style-type: none"> • The Plan's priority to improve affordability and to deliver additional affordable homes; • The need to boost supply significantly and to build in greater flexibility in the Plan if the anticipated housing supply does not deliver; and • Unmet need from neighbouring authorities (e.g Reading); <p>With the above in mind, it is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039.</p> <p>In addition, the Council's housing supply would fail to meet the minimum LHN. This is particularly due to reliance on windfall sites and large strategic sites (e.g Sandford Park and NE Thatcham) that are questionable in terms of timescales for housing delivery and annual rate of completions. The Council's justification for the allocation NE Thatcham is also not warranted, particularly given the lack of updated evidence and reduction in housing numbers.</p> <p>As a result, and noting the significant amount of available land in the HELAA that has been overlooked, it is concluded that the remedy is for the LPR is to allocate more sites for housing over the plan period, consistent with the broad spatial strategy i.e. focusing development on the most sustainable settlements, including Newbury, in accordance with the settlement hierarchy (Policy SP3/Table 1 District Settlement Hierarchy).</p> <p>Accordingly, we are of the view that the Council should consider 'land south of Newbury Racecourse', in addition to other sites that have been overlooked in suitable locations, for allocation in the Local Plan Review. We contend that the site is suitable, available and achievable and therefore the Council has been premature and unjustified in declaring it undevelopable over the plan period. Its allocation would, in principle, be consistent with the settlement hierarchy.</p> <p>We trust this Statement clearly sets out our client's position at this stage and respectfully request that the above is given due consideration as part of the West Berkshire Local Plan Review.</p> <p><Accompanying statement attached></p> <p>"Land south of Newbury Racecourse" documents attached:</p> <ul style="list-style-type: none"> • LVIA • Illustrative Maps (1 - 3) • Appendices
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please see accompanying statement for our full representations.</p> <p>There is a need to allocate additional housing sites. Accordingly, we are of the view that the Council should reconsider allocation our clients' site at 'land adjacent New Road, Newbury', in addition to other sites that have been overlooked, for allocation in the Local Plan Review. There are no significant technical, physical, or environmental constraints that would prevent development of the site and its delivery.</p> <p>The specialist evidence indicates that the Council's conclusions in regard to ancient woodland are not well founded and, therefore, the site should be re-considered for allocation in the Plan.</p> <p><accompanying statement attached></p> <p>Additional information re. land adjacent New Road, Newbury attached.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hayter, Lynn
Consultee Full Name	Lynn Hayter
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS670
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 12:44:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	No
* Yes	
* No	
Please give reasons for your answer	<p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>“(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”</p> <p>The SA/SEA Environmental Report states:</p> <p>“The Core Strategy had a focus on Newbury and Thatcham, with two strategic sites allocated in Newbury and smaller sites allocated across the rest of the district. This mix of strategic and smaller sites across the district worked well for the Core Strategy by providing flexibility and natural phasing of developments across the plan period. As a result a similar mix of sites is considered to be appropriate for the LPR with no other alternatives considered.”</p> <p>Regulation 12 requires the identification, description and evaluation of ‘reasonable alternatives’. If an approach worked well in the current plan period, it does not follow that it is the best approach for the following plan period—and it is certainly does not follow that there are no ‘reasonable alternatives’. It is incorrect for the SA/SEA to assert that the approach in the current Local Plan has ‘worked well’ by providing ‘natural phasing of developments across the plan period. This is certainly not the case for the Sandleford Strategic Site Allocation. Policy CS3 of the current Local Plan states: “Within the area identified at Sandleford Park, a sustainable and high quality mixed use development Issue: The Sustainability Appraisal for Policy SP1-Spatial Strategy</p> <p>Section/paragraph: 4.19 Policy: SP1–Spatial Strategy Appendix: Policies</p> <p>Map: Other: SP16, SP17 Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) November 2022</p> <p>Sustainability Appraisal / Strategic Environmental Assessment; Appendix 5 will be delivered in accordance with the following parameters:</p> <p>Phased delivery of up to 2,000 dwellings, of which at least 40% will be affordable and with an emphasis on family housing. At least half the housing is planned to be delivered by 2026;” However, as the SA/SEA explains (pages 35-37): “no work has started at the site at Sandleford, with outline planning permission for the eastern part of the site only granted (on appeal) in May 2022.” The site has been re-allocated “as a single site for up to 1500 dwellings”. “Reducing the number of dwellings on the site allowed for better consideration of the constraints on the site (Ancient woodland, drainage, landscape buffers etc.) and will allow for adequate and appropriate mitigation measures to be put in place.”</p>

	<p>The SA/SEA states (page 25, below the table): "Following the decision that the spatial strategy should focus on Thatcham, strategic site options were considered, based on the sites submitted through the February 2020 HELAA."</p> <p>Therefore, 'reasonable alternatives' that are not around Thatcham were not considered. This decision was also based on the false premise that the town of Thatcham would have sufficient infrastructure to support this development, either at the time of the decision or as a result of the development. The lack of infrastructure in Thatcham is addressed by other representations of the Town Council.</p> <p>The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policy SP1 cannot be legally compliant, because it explicitly states that it has not complied with the requirement to identify, describe and evaluate reasonable alternatives to the proposed policy. The experience of delays in delivery of Sandleford Park in the current plan period (described in paragraphs 6.44–6.46 of the draft Local Plan, and the reduction in the number of dwellings from 2,000 to 1,500, suggest that the proposed policy for North East Thatcham is not even the best alternative.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>As explain in Section 1 above, the draft Local Plan explicitly states that no alternatives have been considered. The evidence of the failure of the Sandleford Strategic Site Allocation to deliver the expected number of houses suggests that relying on two strategic sites (with a number of smaller sites) is not even the best approach.</p> <p>As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A

4. Proposed Changes	A new Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) needs to be undertaken, which considers all 'reasonable alternatives' to the decisions relating to strategic sites and proposed approach of Policy SP1.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS708
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	PS708 Pegasus (Donnington New Homes) Appendix 1.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park South (SPS) (site: NEW8)</p> <p>WBC Evidence Base</p> <p>Turning now to the Evidence Base on which the Council has based its assessment. In January, 2023, the Council updated its HELAA to reflect a number of additional sites put forwards along with corrections made in response to the previous consultation (including reference to my client's part of site as 'NEW8: Sandleford Park South'). In line with previous versions of the HELAA, the 2023 update assesses each site at Appendix 4. In relation to 'Local Plan History', the assessment of my client's site states the site was;</p> <p><i>'.....ruled out for allocation because the site is close to the strategic site allocation of Sandleford, and it was considered that this part of Newbury should not have further development of this scale in the short to medium term.'</i></p> <p>The Council's method for not considering Sandleford Park South for allocation is flawed in that considering an area 'should not have further development' does not accord with the requirements set out in the NPPG in relation to Plan Making. Para 038 states that '<i>Policies need to be justified</i>' and goes on to state that, '<i>evidence needs to inform what is in the plan</i>'. Simply considering that an area should 'not have further development' is not a justified approach to plan making and is not based on evidence. The evidence presented in our previous representations (including Appendix A) relating to Sandleford Park South shows that the site is SUITABLE for development, AVAILABLE, and ACHIEVABLE.</p> <p>In relation to evidence, para 038 of NPPG states that '<i>evidence needs to inform what is in the plan.....rather than being collected retrospectively</i>'. It is therefore, interesting that the Council only updated its HELAA in January 2023, which is the same month it published its current Regulation 19 Consultation Plan – it would seem this would have allowed little time for the Council to properly consider the updates to the HELAA in order that they be given thorough consideration within the current consultation Plan and reflect the requirements of the NPPG that evidence should inform the Plan.</p> <p>The Council's other key concern relating to the site relates to impact on distant views of the landscape stating that development of the site, '<i>would not respect the role the landscape plays as setting to the character of Newbury</i>'. As demonstrated by the Landscape Appraisal commissioned by our client and submitted as an Appendix to our February 2021 representations (and included here at Appendix A <See attached document PS708 Pegasus (Donnington New Homes) Appendix 1>, the Council's conclusions on this matter are incorrect. The Landscape Appraisal clarifies that (absence of) impact, as follows:</p> <ul style="list-style-type: none"> • Visual Amenity – <i>"the site benefits from a significant degree of visual containment such that development as proposed with the masterplan would not have a significant visual effect upon the</i>

surrounding settlements or countryside".... "By introducing a substantial tree belt running along the southern boundary of the western half of the site on the steeper slopes and adjacent to the River Enborne watercourse, such a linear tree belt would provide substantial screening for residential properties on the lower slopes of the site. With a spine road running through the site orientated east-west linking the Andover Road with the residential allocation to the north, this would provide the opportunity to introduce substantial tree cover along this highway corridor."

- **Landscape Character** – "the site and its immediate environs form a heavily wooded landscape and that as far as the site is concerned, it physically and visually relates to the River Enborne Valley, a shallow narrow valley which is broadly orientated east-west linking Newtown and Newtown Common to the east with Enborne Row to the west. Beyond the boundary of the settlement itself, there is a sense of rurality and this is achieved because there is little by way of visual connection with the adjacent settlements and in particular, Newbury and Wash Common to the north"...."; "There is a wooded character to the landscape, and this is also evident on the site"; "The proposed masterplan envisages a number of neighbourhood areas which are set within the retained vegetation and in particular tree cover that frames and subdivides the site. As a consequence, the residential neighbourhoods would have a strong sylvan backdrop and character to them which reflects the general character of the immediate locality. The proposed development would therefore be in keeping with the character and appearance of the local existing residential neighbourhoods".
- **Potential Development Framework Strategy** – "In terms of visual amenity, the eastern half of the site is extremely well contained in visual terms given the topography and configuration of tree cover and woodland framing the site. Whilst the western half of the site is more visible from some public footpaths on the southern side of the valley, by introducing a tree belt along the southern boundary of the site adjacent to the Enborne River as a riparian wooded landscape, together with a strong boulevard feature defining the spine road which traverses the mid slope, both these features would effectively visually frame residential neighbourhoods on the upper and lower slopes within the western half of the site".
- **Concluding Remarks** – "A residential development within this site accommodating the field and vegetation pattern would ensure that the proposal would reflect the grain of the landscape and in so doing would be in keeping with the character and appearance of other residential neighbourhoods in the local landscape and townscape. This would ensure that the residential scheme would be successfully integrated into the existing landscape framework of the site and its surrounding area."

As detailed in the submission made in February 2021 (Appendix A) which set out our client's views in relation to the Council's conclusions on the suitability of the site, we remain of the same views which, in summary, are that the Council has inaccurately categorised the site in relation to its **SUITABILITY** for development. The Council concluded that the site would be 'inappropriate in the context of settlement form, pattern and character of the landscape' and included references to 'Local Wildlife Sites within the site'.

Of most importance, is that this conclusion significantly overlooks the range of benefits that could be delivered in association with the site including new publicly accessible open space, including a riverside walk, a range of new homes including affordable provision, potential for landscape enhancements within and around parcels of development designed to 'integrate into the landscape' (WBC HELAA 2023, Appendix 4). In addition, and of key importance, however, is the delivery of the **Wash Common Relief Road**.

It is well documented that the delivery of a **Wash Common Relief Road** has been a long-standing local aspiration as evidenced by its reference within the Newbury Town Plan 2019-2036 (Adopted June 2018) which states, on page 37:

*"The foregoing [a new road from the Swan roundabout to the A34 along the River Enborne] would link in with a specific proposal by the Town Council on the vehicle access to Sandleford. In common with local residents, we do not support Warren Road as the principal western access, because of interference with the considerable local traffic to schools and shops, and Andover Road's role as a principal gateway into the town. We need to make provision for the large proportion of cars from Sandleford which will wish to join the A34. **Our recommended solution is a new road from the western Sandleford development east and south of Garden Close Lane, joining the A343 at Wash Water. The Town Council's position is that this is the only feasible solution for a western access to Sandleford.**"*

This is reiterated at para 8.11.4 on page 41, where proposals to create additional road capacity in the Town are outlined: "A new road from the planned western Sandleford development east and south of Garden Close Lane, joining the A343 at Wash Water, to provide a direct access for Sandleford residents to the A34."

This aspiration is reflected in WBDC's own conclusions on the suitability of Sandleford Park South to deliver an additional access to Sandleford Park whereby, in relation to Highway and Access matters, Appendix 4 of the January 2023 HELAA states;

'Vehicular access for this site and the adjoining sites would be obtained via the A343 Andover Road ...connecting into Sandleford (Park). This is very important as it allows traffic to not only spread from these three sites, but will also provide access to for Sandleford that will reduce traffic on Andover Road to the north'.

It is therefore clear that plan makers - both within West Berkshire District Council and within Newbury Town Council - consider the benefits associated with an allocation at Sandleford Park South as being highly significant in delivering the long-held aspiration of a Wash Common Relief Road. As set out in previous representations relating to this site, and reiterated above, the site can deliver this benefit together with a series of other local benefits (including affordable housing, public open space and a riverside walk), without causing any harm to the landscape setting of the local area. Accordingly, is entirely appropriate for development and should be allocated within the emerging Plan.

	<p>Relationship with adjoining land</p> <p>Land to the west of the my clients site is currently controlled by Gladman developments. That area of land provides connectivity to the A343 (Andover Road) which would allow for the consolidated delivery of the Wash Common Relief Road. My client is advised by Gladman that they will make their own representations under separate cover in relation to their land and that matter. My client remains committed to working collaboratively with Gladman, as appropriate, in relation to this matter and all other cross site matters.</p> <p><Attachment SPS Reps Feb 2021: PS708 Pegasus (Donnington New Homes) Appenidx 1></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS241
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As highlighted previously, there are a number of site allocations which are being carried forward from the current Local Plan. Whilst it is understandable that some sites will be included within the Local Plan Review, as they may have been forecast to be in the later years of the currently adopted Local Plan period, it is slightly concerning that main strategic allocation, Sandeford Park is being carried forward together with five of the existing site allocations. It is noted that three of the previously propose allocations, equating to 280 dwellings have been removed. One of these sites was the Kennet Centre which we raised concerns about in our previous representations and we are pleased to see that the Council has now realised that the allocation does not have a realistic prospect of coming forward within the plan period. It is however still concerning to see the over reliance on the Sandeford Park site.</p> <p>Further, as set out in more detail in respect of Policy RS3, formerly RS4, we do not consider that given the advanced stage of this site in the planning process, that the Local Plan Review should be including it as an allocation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1125
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	PS1125 Thames Water - Site Location Plan_east of Hill Rd.pdf PS1125 Thames Water - Illustrative Masterplan_east of Hill Rdp.df PS1125 Thames Water - Drawing PL04_east of Hill Rd.pdf PS1125 Thames Water - Drawing PL07_east of Hill Rd.pdf PS1125 Thames Water - Drawing PL08_east of Hill Rd.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Thames Water owns land on the east side of Hill Road, Speen that is identified on the enclosed plan [see attachment PS1125 Thames Water - Site Location Plan_east of Hill Rd] and which it is considered should be allocated for residential development.</p> <p>The site is an enclosed area of grassland that has been historically retained by Thames Water for operational purposes in association with the adjacent water treatment works. It is approximately 1.2 hectares in size and is located on the south eastern edge of Speen Village, approximately 0.6 miles to the west of Newbury Town Centre. The land slopes from north to south, from approximately 95m AOD to 75m AOD. Access is presently gained from Hill Road, towards the southern end of the site.</p> <p>Pedestrian and cycle access to the site from the town centre can also be achieved via North Croft Lane, making the site an approximate 10 minute walk from the town centre. It is consequently located in a highly sustainable location. Thames Water therefore supports the Council's previous SHLAA assessment that it is suitable for residential development, being located in a predominantly residential area with good access to the services and facilities located in Newbury Town Centre, as well as the open space and leisure facilities at Goldwell Park and Northcroft Leisure Centre.</p> <p>The site has previously been promoted for development through the Council's Housing Site Allocations Development Plan Document (HSADPD). The site was proposed as an allocation in the HSADPD, but then removed due to concerns that the Council had regarding achieving access to the site.</p> <p>Thames Water submitted representations to West Berkshire Council in response to consultation on the HSADPD in December 2015, that provided evidence to demonstrate that access to the site is not a barrier to its allocation for housing. The consultation response provided confirmation of the site assessment work undertaken on behalf of Thames Water, in relation to the site, to demonstrate that there are no technical barriers to the delivery of 33 new homes and public open space at the site.</p> <p>Notwithstanding that the Council did not reinstate the site as an allocation in the HSADPD, Thames Water held a public exhibition at Majendie Hall, St Marys Church, Church Lane, Speen on Friday 8th and Saturday 9th July 2016. The consultation event followed consultation with Speen Parish Council and was based on a development of 22 new homes within a developable area of 0.85ha alongside some 0.35ha of open space. The illustrative masterplan on which the public consultation was based is also enclosed with this representation (drawing SK05E) [see attachment PS1125 Thames Water - Illustrative Masterplan_east of Hill Rd], which shows how the 22 new homes could be accommodated within the site at a density of 25 dwellings per hectare; this low density being in keeping with the wider area.</p> <p>Site Access</p> <p>The principle reason that the Council decided to omit the allocation of the site in the HSADPD was over concerns regarding access. Thames Water instructed Transport Planning Associates (TPA) to confirm that safe access into the site can be achieved via Hill Road and its junction with Speen Lane.</p> <p>Enclosed with this submission are drawings PL04 [see attachment PS1125 Thames Water - Drawing PL04_east of Hill Rd], PL07 [see attachment PS1125 Thames Water - Drawing PL07_east of Hill Rd] and</p>

	<p>PL08 [see attachment PS1125 Thames Water - Drawing PL08_east of Hill Rd] which illustrate TPA's designs for improvements to Hill Road, creation of a new site access and the junction with Speen Lane. The result is an acceptable access to the site which is capable of facilitating the bringing forward of the site for residential development.</p> <p>Drawing PL04 shows that the lane would be widened to 4.8m with a 1.8m footway on the eastern side. The newly created carriage way and footway will continue on into the site itself (drawing PL08). Drawing PL07 illustrates how traffic calming measures could be introduced along Speen Lane reducing the speed limit to 20 mph.</p> <p>For the reasons set out above, it is concluded that adequate access can be achieved to facilitate the development of the site.</p> <p>Further Technical Work</p> <p>Further technical work has been undertaken, including the assessment of landscape and visual impacts, flood risk, an ecological appraisal, a ground conditions and hydrological risk assessment, and archaeological appraisal. This work has not identified any constraints that would prevent the development of the site in a manner proposed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>For the above reasons we consider the site suitable and deliverable for a development of approximately 22 dwellings as illustrated on the enclosed drawing SK05E [see attachment 'PS1125 Thames Water - Illustrative Masterplan_east of Hill Rd] and should be allocated as such.</p> <p>Given that large sites at Newbury and Thatcham that were allocated in the Core Strategy and HSADPD (including the 2,000 home allocation at Sandford Park) have been delayed in coming forward it is important therefore that this shortfall is addressed. The allocation of the sustainably located site at Speen would help address this shortfall in line with the spatial strategy and should be allocated accordingly.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To test the council's argument for not allocating the sustainably located site
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Thames Water
<p>Consultee Full Name</p>	Thames Water
<p>Consultee Organisation</p>	Thames Water Utilities Ltd
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1127

Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	PS1127 Thames Water_Site Location Plan_west of Hill Rd.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Thames Water owns land on the west side of Hill Road, Speen that is identified on the enclosed plan [see attachment 'PS1127 Thames Water - Site Location Plan_west of Hill Rd'] and which it is considered should be allocated for residential development. This site has not been previously promoted for development by Thames Water due to concerns regarding the protection of an operational abstraction borehole located immediately to the south of the site. However, in undertaking the work required to confirm that the land east of Hill Road can be released without harming

	<p>Thames Water's operational works at Speen, it was confirmed that the northern part of Thames Water's land holding to the west of Hill Road could be released for development. A detailed risk assessment would be required once a development proposal has been produced. At this stage, we believe a development of 10 to 20 houses would be possible, with the remainder of the site being brought forward as open space and environmental enhancements.</p> <p>It is proposed that the site would be accessed via Hill Road, as per the proposal for the land to the East of Hill Road. Work previously undertaken by TPA demonstrated that the proposed access arrangements submitted for the land to the east of Hill Road was sufficient for 33 dwellings. Consequently, were the land to the East and West of Hill Road to come forward for development as proposed this would entail a total of 42 dwellings. It is therefore felt that the access proposals are adequate to enable both sites to come forward.</p> <p>In light of the work already undertaken on the land to the east of Hill Road, there are no known constraints for this site coming forward for residential development during the lifetime of the Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>For the above reasons we consider the site suitable and deliverable for a development of 10-20 dwellings. Given that large sites at Newbury and Thatcham that were allocated in the Core Strategy and HSADPD (including the 2,000 home allocation at Sandford Park) have been delayed in coming forward it is important therefore that this shortfall is addressed. The allocation of the sustainably located site at Speen would help address this shortfall in line with the spatial strategy and should be allocated accordingly.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To test the council's argument for not allocating the sustainably located site
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Gladman Developments Ltd
<p>Consultee Full Name</p>	Mr Josh Plant
<p>Consultee Organisation</p>	Gladman Developments Ltd
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS732
<p>Chapter / Policy / Appendix Number</p>	Policy SP 13
<p>Chapter / Policy / Appendix Title</p>	Sites allocated for residential and mixed-use development in Newbury and Thatcham

Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:38:00
Attached Files	PS732 Gladman Developments Full Response.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<i>Omission Site</i> Gladman Developments Ltd, together with Donnington New Homes, are jointly promoting the area of land located to the south of the existing Core Strategy allocation at Sandleford Park (Policy CS3), referred to as Sandleford Park South (SPS), for residential development alongside proposals for the delivery of a Relief Road. A location plan is included at Figure 1 below. This representation follows on from previous submissions which have been submitted by Gladman and by Pegasus on behalf of Gladman, the most recent of which was to the Regulation 18 West Berkshire Local Plan Review emerging draft consultation in February 2021. As part of the previous submission, a detailed Landscape Appraisal was undertaken by Pegasus and is included at Appendix 1 <see attachment>. <Figure 1 Sandleford Park South Location Plan – see attachment>

Newbury is the largest and most sustainable settlement within West Berkshire and as such has rightly been the focus for future development. The proposed development site is well located to the south of the town and is within safe walking distance of a wide variety of services and facilities, including Falkland Primary School, Park House School and range of medical and retail outlets along Andover Road. Further to the current available services and facilities, the site is directly adjacent to the Sandlesford Park strategic site which will provide further amenities and services once completed.

The proposed development would include the delivery of a Relief Road running between the western part of the Sandlesford Park strategic development site, within New Warren Farm and the A343 Andover Road at Sandpit Hill, Wash Water, providing a fifth access to Sandlesford Park. The delivery of this road infrastructure would redistribute traffic from Sandlesford Park, relieving Monks Lane, Andover Road and Warren Road as west-bound routes to the A34. The proposed indicative route of this road and how this would sit alongside proposed residential development is set out in the concept masterplan at Appendix 2.

Pegasus's February 2021 representation highlighted our concerns that the HELAA assessment of the site had not fully considered the significant benefits the scheme could deliver to the local highway network by providing a fifth access into Sandlesford Park. Indeed, the Council's Highways engineer's response to the HELAA stated that the delivery of strategic road infrastructure through the site is 'very important'.

Access

Vehicular access for this site and the adjoining sites would be obtained via the A343 Andover Road with a 6.0 meter wide through road northwards connecting into Sandlesford. This is very important as it allows traffic to not only spread from these three sites, but will also provide a fifth access for Sandlesford that will reduce traffic on Andover Road to the north. The access on to the A343 will need to be a full roundabout or a traffic signal junction.

Further to the positive benefits the Council's highways engineers deem from the delivery of the fifth access in Sandlesford Park, there is also a clear level of support from the local community for the provision of the Relief Road. Newbury Town Council prepared a Town Plan to focus on how the town of Newbury should respond positively and constructively to future development and challenges over the period 2019-2036. Within the Town Plan there is an aspiration of Newbury Town Council to improve the transport and highway network within the town. A key component of delivering this aspiration is the provision of a new road from the planned western Sandlesford development east and south of Garden Close Lane, joining the A343 at Wash Water in order to provide a direct access for Sandlesford residents to the A347.

This Relief Road could be delivered in full within Sandlesford Park on land controlled by Gladman and Donnington New Homes.

As set out in the Landscape Appraisal, the site is relatively free from environmental constraints and as shown in the concept masterplan, included at Appendix 2, the areas of woodland would be retained. The areas of woodland which are present on site have been examined and have been shown to be in a state of steady decline. The provision of residential development would enable these woodland areas to form part of the green infrastructure and enable the public to access and enjoy them.

Future public recreation could be kept to specific footpaths providing a benefit for existing and future residents. The proposed development of the site would reverse the current state of decline of the woodlands through investment in woodland management and maintenance, thus providing ecological benefits.

Further benefits of the proposed development site include a riverside linear park following the northern bank of the River Enborne. Whilst providing an attractive natural area of public open space, the riverside park will also provide a new route by foot and cycle from Wash Water to the new Country Park which forms part of the Sandlesford Park allocation and which is to be delivered through the planning permission to Bloor Homes. At present, there is only one public right of way from Wash Common through Sandlesford Park to the A339 – that being from Warren Road eastwards to a point opposite St Gabriel's School. The provision of a second pedestrian/cycle route will be of benefit to existing and future local residents.

Attachments:

Full Response inc. Appendix 1 (Landscape appraisal for land at Sandlesford Park South, Newbury) and Appendix 2 (Concept Masterplan)

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS862
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SITES ALLOCATED FOR RESIDENTIAL DEVELOPMENT: NEWBURY & THATCHAM AREA</p> <p>Too many Newbury Sites that are already known about are not included and will not benefit from having Specific Policy. These include:</p> <ul style="list-style-type: none"> • Gateway Plaza on no- WBC Land – PAs expired but it will be redeveloped. • Gateway Plaza on WBC Land. • Old Magistrates Court – not started and within SSSI buffer zone. • Kennet Centre/Eagle Quarter – planning refused but will be developed in the Plan timescale • Phoenix Centre • Sterling Gardens Phase 2 • Sims Metal Management (Old Passey Yard) land off Waller Drive • Mayfield Centre • Old Bayer 2 Sites <p>No Comments on rest of RSA Site Allocations</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS834
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	No

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP13 – SITE ALLOCATIONS FOR RESIDENTIAL & MIXED-USE DEVELOPMENT – in Newbury</p> <p>Sites without Site Allocations and an absence of Policy include:</p> <ul style="list-style-type: none"> • <u>NEW 1 – LRIE within the London Road Estates DEA</u> (but NOT in the Brownfield Register) and earmarked for Office and Industrial use, yet it is unclear the status of some previously approved Residential Units on lands within, and Merchants Court which is now Residential and in the DEA. This land has the highly polluted Northbrook Stream running through it and partial culverting followed by un-culverted sections are clearly showing this pollution is build up and it runs into a SSSI. • <u>Gateway Plaza</u> (2 brownfield sites and the latest spreadsheet states their Planning Applications have expired). They are within London Road Estates DEA but appears to be mixed with Residential, albeit there are no complete Maps anywhere for the development as illustrated in this video because it has no Site Allocation? https://www.youtube.com/watch?v=RCa_C7DGfR8 . There is no logical reason why these lands are not in the Site Allocations and given Policy to guide their development through to 2039. • <u>the Kennet Centre/Eagle Quarter</u> redevelopment (Brownfield) which will probably go to appeal and something will happen there in the next 20 years. Ideal for Site Allocation with a Policy around it to determine the endless debates about Mix, Height, Density, Design, Provision of Public Open Space, Impact on the Conservation Area Analysis etc. etc. • <u>the Old Magistrates Court</u> (brownfield) which is within the Kennet SSSI Buffer Zone. Not started and required Buffer Zones are compromised. <p>All these 4 above are also subject to Flood Risk of varying degrees so Policy in the DPD is very important again in terms of mix, density, height, design, and Environmental Impacts etc.</p> <p>Likewise, some Sites which are already under construction should be included such as:</p> <ul style="list-style-type: none"> • the <u>Sterling Gardens Residential Phase 2</u> as the 1st Phase has been fraught with problems and the new road is not yet finished or tested, the SuDS have not been signed off, and there is still no agreement to deal with the on-street parking outside neighbouring properties in Kings Road which has been displaced. I would like to see a Site Allocation AND Policy for the Phase 2 Development which are separate blocks of flats. • The <u>Shaw 401 straddling the A339 North of Newbury</u>- issues around the SuDS and future phases as development appears to have stopped on the Donnington Heights west-side. The Shaw Valley East-side has significant flood risk to parts of the site and the Cumulative Impact of Development on Flood Risk in the Catchment Area (CIOD OFRICA) may not have been assessed as there is no Methodology for doing this within the new SFRA Level 1 Addendum 1. • The new <u>Mayfield Point Mixed Development at Wash Common</u> on the South-side between the College & the A339 which appears to be within the Settlement Boundary and has now gone to appeal. • <u>Sims Metal Management & J. Passey & Son Butchers, Turnpike Road/Waller Drive, Newbury</u>- (brownfield and an old knacker's yard) not started and again Contamination & Flood Risk issues as the site includes the Stone Copse bourn which has a history of flooding (42 in Waller Drive the other side of the road). It has never been clear why it was not included in the Turnpike Estate DEA as to make it viable it will not deliver any Social Housing. Would be better filling the gaps in Industrial or Manufacturing land. • Land adjoining the <u>Phoenix Centre</u> (brownfield) • <u>Bayer House and land to the rear of 1-15 Northbrook Street</u> – (brownfield and salami sliced to avoid EIA). The Sites include the very polluted and partially culverted Northbrook Stream which runs underneath the site. <p>Nb.</p> <p>The Map of Brownfield Sites is no longer visible, and we are just given a spreadsheet to try and visualise how they map together?</p> <p>Finding Maps of the DEAs is difficult.</p> <p>Given the comments above It almost appears as if someone has just forgotten to Allocate the Mixed Sites for Newbury within this Policy or most of them are on the too difficult pile which is precisely why they need Allocating and Policy behind them.</p>

The number of missing Mixed and Brownfield Sites gives the whole Plan for Newbury a feeling of not being SOUND and probably not Justifiable in its current form. There will be a huge increase in Dwellings and Households within this Plan without identified local Employment land to provide jobs for those households which indicates lots of extra commuting without any major improvements within the Transport for Southeast Strategic Investment Plan to 2050.

LRIE & Gateway Plaza –

None of this is allocated in the Plan under any category, and as far as I can ascertain none has Planning Applications in date. All lies within the London Rd Estates DEA.

These 2 or 3 Sites total about 13 hectares with mixed development, mixed Landowners, and at various Risk of Flooding.

- Fluvial from the R. Kennet, and Canal overflow
- Fluvial from Lambourn Catchment and the polluted Northbrook Ordinary Watercourse
- Groundwater levels which are between the Surface and 0.25m below the Surface,
- Kennet & Avon Canal Overflow
- Incidents of Sewage overspill.
- And the majority of the Area is in the NE NNZ for R. Lambourn Catchment (source to Newbury).

Part of this much fought over area which is known as NEW1 – LRIE (WBC land in London Road Industrial estate) does NOT have a Site Allocation or development plan policy. It is a horrible polluting area which includes an old Landfill Site, the Newbury Wastewater Treatment Works, a Calor Gas Centre, and a Plant Hire business that washes very undesirable soils into the faulty drainage.

It has been rumbling on for 10 years without the basic Environmental Assessments taking place and this really is an opportunity to try and have proper Site Allocation within this Plan and some Policy which would direct its re-development in a modern Holistic way. This would enable:

- the pollution of the Northbrook to stop
- the malfunctioning sewage and surface water drainage to be rectified,
- the WwTW to be expanded to cope for Sandleford,
- the Flood Risk downstream and to the North in the Catchment where I live to be rectified,
- the correct Buffer Zones to be introduced for the SSSIs,
- projected Air Quality, Noise, Light, Hot Spots to be properly dealt with
- Nature-based solutions within a new Green/Blue Infrastructure Framework to be mapped and installed to gain Biodiversity
- And Highways volumes and drainage to be properly assessed.

We do not want to wait for an SPD – we want these Sites Allocated now with Policy

These Sites are part of the London Road Estates DEA, however the Policy for DEA at DM32 is not sufficiently robust to cover them and they should be Allocated Sites – separately or jointly whichever the wise Inspector feels is the best way to deal with them.

As there is a good deal of confusion over this rather large area right on my doorstep. As it currently poses more flood risk I was hoping that the Local Plan Review would include the Site(s) to give clarity on what high-level Policy would be in place to guide the work of development over a 20 year timescale. The avoidance of conducting holistic Flood Risk Assessment from ALL Sources and preparation of a holistic Surface Water Drainage Strategy with Thames Water cannot continue. The SFRA Level 2 Site Specific Analysis in Appendix B&C demands this is done under the Local Plan Review and it is a cop out not to include these Sites in this LPR.

<Comments from representation form>

None of the **Key Mixed Sites for Newbury** are included such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, and without these Key Sites and any specific Policy around them.

The Plan omits **Key Brownfield Sites for Newbury** which has favoured the Sandleford Greenfield site.

It omits one **Key Employment Site for Newbury**.

Without a **Newbury Settlement Sub Area SP Policy** there is no clearly articulated Map or Data for this important Major Town.

Without clear **Maps & Data & Lists for Newbury** of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.

Therefore, I conclude the Plan is **Not Sound** for Newbury Settlement and:

- Is Not Positively Prepared
- Is Not Justified
- Is Not Effective for the next 20 years, and this Plan as it stands will Not Achieve the Visions

My document highlights many examples.

Soundness

This means all the missing sites identified in this Document will not have the benefit of coming before a Planning Inspector. This position, in my view, makes the LPR 2022-2039 **Unsound** in respect of the Newbury Settlement.

The missing Sites mean it has **not been Positively Prepared**,

It is **Not Justified** in terms of Households vs Infrastructure vs Employment as this is not adequately explained for this Settlement.

	<p>As it is without the missing Sites which are required to make it work it will also Not Be Effective. Therefore, I conclude the Plan is Not Sound for Newbury Settlement and:</p> <ul style="list-style-type: none"> • Is Not Positively Prepared • Is Not Justified • Is Not Effective for the next 20 years, and this Plan as it stands will Not Achieve the Visions <p>My document highlights many examples.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include Key Mixed Sites for Newbury such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, Old Magistrates Court and without these Key Sites and any specific Policy around them. Include Brownfield Sites for Newbury to balance against the favoured the Sandleford Greenfield site. Include the missing Key Employment Sites for Newbury. Include a Newbury Settlement Sub Area SP Policy with a clearly articulated Map or Data for this important Major Town. Include Maps & Data & Lists for Newbury of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>CALA Group Ltd (Represented by Pro Vision)</p>
<p>Consultee Full Name</p>	<p>Mr Paul McCann</p>
<p>Consultee Organisation</p>	<p>CALA Group Ltd</p>
<p>Agent Full Name</p>	<p>James Iles</p>
<p>Agent Organisation</p>	<p>Pro Vision</p>
<p>Comment ID</p>	<p>PS1217</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 13</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Sites allocated for residential and mixed-use development in Newbury and Thatcham</p>

Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:03:00
Attached Files	PS1215 Pro Vision (CALA Group) (Hungerford) Pro Vision (CALA Group) Pinchington Lane.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><i>Extract of full representation relevant to this consultation point. For full representation see attachment. Footnotes are included in the attachment.</i></p> <p>New allocations</p> <p><i>Sandleford Park (as allocated at Policies SP13 and SP16)</i></p> <p>The HBP, at Appendix 2, sets out the housing trajectory including the phasing of individual sites.</p> <p>The Council contends that Sandleford East (which benefits from outline planning permission) will begin delivering 100 dpa from 2025/26 through to 2034/35, with 80 dwellings provided during the year 2035/36.</p>

This appears to be an optimistic timetable, particularly given the previous planning delays with the site (allocated in 2012), that we understand a reserved matters application has yet to be submitted for any phase(s) and the need to address several planning conditions prior to commencement of construction. The start date of 2025/26 for first completions therefore seems very much a 'best case scenario'.

It is understood that the site is being delivered by a single housebuilder. This therefore could lead to a lower absorption rate due to lack of variety of housing product in accordance with the findings of Letwin's Independent Review of Build Out (October 2018). The 100 dpa across the plan period therefore is likely to be impractical and affect site delivery over the plan period.

With regards to Sandleford West, this site does not have any planning permission despite an outline application being submitted in April 2018. It appears that the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/8 is simply conjecture. There will also be a need to submit and agree reserved matters and address conditions ahead of that time.

With the above in mind, it is considered that the Council should take a more cautious approach with the delivery of Sandleford Park during the plan period. The Regulation 18 Consultation noted that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy.

North East Thattham (as allocated at Policies SP13 and SP17)

The Council has reduced the delivery of NE Thattham from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council anticipate that NE Thattham will deliver 1,500 homes over the plan period (compared to 1,250 dwellings expected at the Regulation 18 stage). For reasons we discuss below, this appears to be unjustified.

The justification for NE Thattham

The supporting evidence base for NE Thattham - including the Thattham Strategic Growth Study (which includes a Vision and Concept Plan) - still refer to the delivery of 2,500 homes and has not been updated to reflect the position in the current version of the LPR. This also includes the Viability Testing which tested 2,300-2,500 new homes. This work would need to be updated for any Plan to be found sound.

The site allocation policy also still refers to the delivery of the secondary school. However, there is no updated viability appraisal to confirm that this is deliverable for a site of 1,500 new homes in total. This raises the following concerns:

- The Thattham Growth Study (Stage 3) acknowledges that strategic development at this scale (i.e. 2,500 new homes) is the only approach that is likely to deliver an additional secondary school for the town, without which any growth would cause issues in provision.
- Again, the Thattham Growth Study (Stage 3) notes that the scale of development (i.e. 2,500 new homes) would not create the need for a secondary school development on its own and, therefore, is only half-funded by developer contribution. A reduction to 1,500 new homes is therefore likely to increase this funding gap further, with no indication of how this additional funding will be resolved.
- A secondary school would internalise a significant number of trips from the proposed development. Indeed, the Access and Movement Report for NE Thattham in the Thattham Growth Study (Stage 3) assumes that the secondary school will have 50% internal trips. Therefore, with question marks over the potential delivery of a secondary school for a site of 1,500 new homes, the sustainability credentials of NE Thattham are uncertain.

As a result, the identification of NE Thattham lacks evidence to support the allocation of for 1,500 new homes. In particular, the lack of delivery of a secondary school and reduction in housing numbers would take away the key justification for growth at this location to help deliver new education provision and additional community infrastructure. The SA/SEA, at Appendix 4, acknowledges this but the Council still proceed on this basis as it is considered that 2,500 new homes in Thattham is too many.

There is a confused picture in the evidence base. We note the publication of the West Berkshire Strategic Vision (November 2022), which is explained to be a response to paragraph 22 of the NPPF (requiring local plans to look beyond the plan period where they include larger scale developments).

This evidence suggests that there remains intention for a much larger development at NE Thattham than the 1,500 homes now included in the LPR. The settlement boundary amendments, and site boundaries identified in the LPR (footnote 14), are unchanged from Regulation 18, gives clear indication that a more substantial development is planned for (footnote 15).

The LPR, however, makes no reference to this strategic vision. In which case, there is a potential conflict with national policy (specifically NPPF 22).

We also note that, whilst the vision has been subject of targeted stakeholder consultation, it has not been published for public consultation as part of the Draft LPR at Regulation 18 stage.

Attachments: full representation including appendix A and B

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	To examine our objections to the development strategy
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	CALA Group Ltd (Represented by Pro Vision)
Consultee Full Name	Mr Paul McCann
Consultee Organisation	CALA Group Ltd
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS1220
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:03:00
Attached Files	Pro Vision (CALA Group) Pinchington Lane.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>Omission Site</i></p> <p>CALA is promoting land at Pinchington Lane for residential development (HELAA site GRE1).</p> <p>In the context of the preceding sections identifying potential weaknesses in the development strategy of the LPR, and noting that there are many more available sites in the HELAA that could be brought into a more effective strategy, we now briefly address the evidence base in respect of the assessment of GRE1.</p> <p>The latest HELAA11 concludes that the site is unsuitable for development. Previous versions, however, considered it “potentially developable”¹².</p> <p>Further consideration of the latest site assessment criteria indicates that the latest conclusion is unsound or at least premature in the absence of further site specific survey. Neither is it consistent with the Policy DM12 (Registered Parks and Gardens), which makes it clear that development within, or otherwise affecting, these designations is not necessarily precluded, but that care and attention is needed over managing the impacts. The supporting text explains that applications (for development) within or adjoining parks and gardens “will therefore be expected to protect the special features, historic interest and setting of the designed landscape”¹³.</p> <p>In summary, the HELAA assesses the site to be:</p> <ul style="list-style-type: none"> • Not impacting the AONB; • Adjoining the settlement boundary; • Benefiting from Local Highways “initial support”, noting the potential access and suitable visibility, and would require further traffic survey (common to other potential development sites); • At low risk of river flooding; surface water can be managed on site and low risk of groundwater flooding, and no recorded history of flooding; • Absent of open space designations; • At low risk of contamination; • Low risk of noise and vibration; • Adjacent to protected wildlife areas (Greenham and Crookham SSSI) and within a biodiversity opportunity area, therefore, detailed site assessment is needed noting that at least part of the site may be suitable but care and mitigation will be needed; • Outside of the Nutrient Neutrality Zone; • With some TPO trees surrounding the property (but few within); • Within a Registered Park and Garden, a designated heritage asset, where development is normally inappropriate, but the recommendation is for further site specific heritage assessment; • Within minerals safeguarding area, possibility of prior extraction; • No other suitability observations are made beyond these standard considerations. <p>The HELAA’s overall conclusion is that the site is “unsuitable” simply due to the heritage impact.</p> <p>We would also note that the site is outside of the Detailed Emergency Planning Zone (DEPZ14).</p> <p>Overall therefore, we consider that the evidence clearly indicates that the site is well located to the built-up area, and has many positive attributes, and is worthy of detailed consideration, including with site specific heritage and ecology assessment.</p>

To assist the Council in this, CALA has submitted a vision for the development of the site and commissioned a heritage report¹⁵, copies of which are appended to this statement. This was submitted to the Planning Policy team last year, and its receipt was acknowledged. However, we note that no acknowledgement of this evidence has been given in the updated HELAA.

In summary, the heritage statement concludes that there is realistic expectation of less than substantial harm from development of part of the site:

In conclusion the site of the proposed development has low potential to impact on below ground archaeology dating to before the creation of the Sandford Parkland. However it is likely that as a 'greenfield' site further evaluation to assess this potential by the conventional methods of geophysical survey and trial trenching are likely to be requested by the local authority.

The site, whilst within the RPG is in private ownership and has been since the 1930s. The site is not accessible from or connected by footpaths to the remainder of the RPG to the south west.

There is therefore no public appreciation or physical indicators of it as being part of a wider landscape setting. The significance and relevance of the RPG designation upon the site has been significantly reduced by the residential development to the west and the site does not in any real sense relate to the remaining significant portion of the RPG situated around St Gabriel's school.

*With respect to the impact of development on the RPG this will be harmful, **though less than substantially harmful**. The impact of development will be due to the reduction in the parkland area, its transformation from parkland to residential and its visual presence when seen from outside the parkland and when viewed from within the park area.*

Mitigation to ensure the impact of the development is as low as possible may be achieved by employing the following design principles:

- *Enhancing the parkland by the inclusion of elements such as the historic driveways in the masterplan proposals (NPPF para 126; Core Strategy CS19).*
- *Limiting the impact of new housing on the northern boundary of the park by landscaping (Core Strategy CS19).*
- *Maintaining the present wooded character of the area (Core Strategy CS19).*
- *Ensuring that new development is appropriate in terms of scale and design in the context of the existing settlement form, pattern and character (Core Strategy CS19).*

The illustrative proposals seek to include these mitigation design principles through: the design of the layout referencing the historic driveways; the retention and enhancement of existing landscaping on the northern boundary; by maintaining and seeking to enhance the woodland area to the south west, including improving the setting around the fishpond to make it more appreciable in the landscape and; by proposing a development that is carefully designed and considered in form, that will respond appropriately to the context around whilst have due regard and care for its setting within the existing RPG.

*The objective of applying these principles is to ensure that the potential impact of development **will be less than substantially harmful for the purposes of the NPPF**. (Our emphasis).*

Attachments: Full rep inc. Appendix A – Land south of Pinchington Lane, Greenham, Newbury, Pro Vision, July 2022 & Appendix B – Land south of Pinchington Lane, Greenham Common, West Berkshire: Heritage Assessment (RPS Group, 21 September 2022)

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To examine our objections to the development strategy</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes</p>	<p>Yes</p>

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hayter, Kenneth
Consultee Full Name	Kenneth Hayter
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS675
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 12:43:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	No
* Yes	
* No	
Please give reasons for your answer	<p>egulation12 ofThe Environmental Assessment of Plans and ProgrammesRegulations 2004 states: “(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2)and (3) of this regulation. (2) The reportshallidentify, describe and evaluate the likely significant effects on the environment of— (a)implementing the plan or programme; and (b)reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.” TheSA/SEA Environmental Report states: “The Core Strategy had afocus on Newbury and Thatcham, with two strategic sites allocated in Newbury and smaller sites allocated across the rest of the district. This mixofstrategic and smaller sites across the district worked well for the Core Strategy by providing flexibility and natural phasing of developments across theplan period. As a result a similar mix of sites is considered to be appropriate for the LPR with noother alternatives considered.” Regulation 12requirestheidentification, description and evaluation of ‘reasonable alternatives’.If an approach worked well in the current plan period, itdoes not follow thatit is the best approach for the following plan period—andit is certainlydoes not followthatthere are no‘reasonable alternatives’. It is incorrect for theSA/SEA toassertthat the approach in thecurrentLocal Plan has‘worked well’ by providing‘naturalphasing of developments across the plan period.This is certainly not the case for theSandleford Strategic Site Allocation. Policy CS3 of the current Local Plan states: “Within the area identified at Sandleford Park, a sustainable and high quality mixed usedevelopment Issue:TheSustainability AppraisalforPolicySP1-Spatial Strategy Section/paragraph:4.19 Policy:SP1–SpatialStrategy Appendix: Policies Map: Other: SP16,SP17 Sustainability Appraisal / Strategic Environmental Assessment(SA/SEA) November 2022 Sustainability Appraisal /Strategic Environmental Assessment; Appendix 5 will be delivered in accordance with the following parameters: Phaseddelivery of up to 2,000 dwellings, of which at least 40% will be affordable and withan emphasis on family housing. At least half the housing is planned to be delivered by2026;” However,as the SA/SEA explains(pages 35-37):“no work has started at the site atSandleford, with outline planningpermission for the eastern part of the site only granted (on appeal) in May 2022.” The site has been re-allocated“as a single sitefor up to 1500 dwellings”.“Reducing thenumber of dwellings on the site allowed forbetterconsideration of the constraints on the site (Ancient woodland, drainage, landscape buffers etc.) and willallow for adequate and appropriate mitigationmeasures to be put in place.” TheSA/SEAstates(page25, belowthetable): “Following the decisionthat the spatial strategy should focus on Thatcham, strategic site options were considered, based on the sites submitted throughthe February 2020 HELAA.” Therefore,‘reasonable alternatives’thatare notaround Thatchamwere not considered.This decisionwas alsobased on the falsepremisethat the town ofThatchamwould have sufficient infrastructure to support</p>

	<p>this development, either at the time of the decision or as a result of the development. The lack of infrastructure in Thatcham is addressed by other representations of the Town Council.</p> <p>The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policy SP1 cannot be legally compliant, because it explicitly states that it has not complied with the requirement to identify, describe and evaluate reasonable alternatives to the proposed policy. The experience of delays in delivery of Sandleford Park in the current plan period (described in paragraphs 6.44–6.46 of the draft Local Plan, and the reduction in the number of dwellings from 2,000 to 1,500, suggest that the proposed policy for North East Thatcham is not even the best alternative.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Sustainability Appraisal should be based on evidence, rather than speculation or supposition. Table 30 compares the SA/SEA a development of 2,500 homes (i.e. the proposal for the Regulation 18 consultation) and for 1,500 homes (i.e. the proposal for the Regulation 19 consultation) for North East Thatcham. It should therefore be based on the SP17 Policy for this development in the Emerging Draft Local Plan for the Regulation 18 consultation and the Draft Local Plan for the Regulation 18 consultation. The table below compares the text of Table 30 with the corresponding parts of Policy SP17 in those two consultations.</p> <p>With the exception of secondary education, the version of Policy SP17 for 1,500 homes (i.e. Regulation 19) gives a greater positive impact and confidence in that impact than the version of Policy SP17 for 2,500 homes (i.e. Regulation 18). Nothing can be meaningfully inferred regarding provision of secondary education:</p> <ul style="list-style-type: none"> -The figure of 8FE appears to have been copied from the Thatcham Strategic Growth Study, where it is given very tentatively as a need resulting from other unspecified developments in the Newbury/Thattham area. -The figure of 2.5FE is below the minimum viable size for a secondary school, so is undeliverable. <p>Thattham Town Council has provided detailed representations on many aspects of Policy SP17, including primary healthcare, secondary education and the provision of social infrastructure in the town.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p>	No

* No	
Please give reasons for your answer	N/A
4. Proposed Changes	A new Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) needs to be undertaken, which considers all 'reasonable alternatives' to the decisions relating to strategic sites and proposed approach of Policy SP1.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wallis Trustees (Represented by Carter Jonas)
Consultee Full Name	Frank Wallis Estate Trustees
Consultee Organisation	Wallis Trustees
Agent Full Name	Steven Sensecall
Agent Organisation	Carter Jonas
Comment ID	PS1383
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:10:00
Attached Files	Wallis Trustees Proposed Vision.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)
2. Do you consider the Local Plan Review is sound? -	No

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>[See attached Proposed Vision document]</p> <p>Owing to the anticipated shortfall in housing delivery requiring the need for additional allocations, it is considered that an additional allocation of land to the east of Waller Drive, Newbury should be included in this policy. As demonstrated in the appended Vision document, this sustainably located site could accommodate up to approximately 350 dwellings and associated public open space. Land to the south of Turnpike Road by the hospital is available for commercial or specialist residential purposes.</p> <p>Summary</p> <p>These representations introduce land east of Waller Drive, Newbury as a highly sustainable development opportunity, suitable for a residential allocation in the Local Plan Review. Additionally, land south of Turnpike Road is available for commercial or specialist residential use. The sites represent an excellent opportunity to deliver much needed, high-quality market and affordable housing, publicly accessible open space and specialist residential or commercial uses whilst maintaining the separation of Newbury and Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Suggested Modification: Additional Residential Allocation - Land East of Waller Drive, Newbury</p> <p>The land East of Waller Drive, Newbury provides an opportunity for sustainable residential development in close proximity to employment uses, public transport nodes and the services and facilities of Newbury and Thatcham. The site is well located to form a logical extension to the residential area of Newbury in addition to creating an opportunity for betterment to the surface water flooding reported in the vicinity at Turnpike Road. The representation is supported by a Vision document which further justifies development in this location and demonstrates that landscape impact will be marginal, successfully maintaining and reinforcing the separation of Newbury and Thatcham.</p>

The land east of Waller Drive comprises several parcels of land to the north and south of the access lane to Tigers Day Nursery. The site is currently farmland and slopes upwards from Turnpike Road to the north and is bounded by Waller Drive to the west and a hedgerow with an unnamed watercourse to the east. The site is surrounded by extensive hedgerow planting with sporadic tree coverage in the southern fields north of Turnpike Road.

An additional parcel of land south of Turnpike Road is available for commercial or specialist residential purposes. The site is flat and bordered by hedgerow and trees and is well related to Newbury. The site could be developed for commercial purposes or specialist residential use complimenting the nearby hospital.

The site could provide employment opportunities for the area whilst recognising the importance of this gateway to Newbury. Development will be focused to the western side of the site to ensure that there is a landscaped buffer to the roundabout to retain the views towards Thatcham and to ensure separation of the settlements.

Land east of Waller Drive, Newbury provides a highly sustainable development opportunity, which would accord with the Council's Vision of providing sustainable development at the main urban areas, including supporting infrastructure, that would deliver a range of different house types, sizes, tenures and affordability that would help to address West Berkshire's future housing need. The site is in one ownership, providing comfort in terms of its deliverability, and avoiding protracted developer negotiations across different interests as demonstrated at Sandleford Park and as likely to occur at North East Thatcham.

We agree with the Council's view that Newbury and Thatcham should remain separate and distinct towns with their own character, whilst remaining geographically close and functionally related, offering significant employment provision with good access to transport linkages. Through the landscape-led master planning process we have demonstrated in the attached opportunities and constraints analysis contained within the appended Vision Document, and the concept masterplan that flows from that analysis, that an attractive development can be provided in a parkland setting that would not have an adverse impact on the existing settlement form, pattern and character of the landscape, and which can be delivered in accordance with the Council's emerging LPR development management policies. The development proposals for the site seek to provide surety that the separation of Newbury and Thatcham will be maintained in addition to providing highly sustainable residential and commercial development in discreet landscaped parcels within the site.

The development of the concept masterplan has been entirely landscape led, seeking to respect and preserve the existing landscape, TPO'd trees and heritage assets through a sensitive response and sympathetic development in a parkland setting. The approach seeks to provide opportunities for improved green infrastructure, woodland planting, accessible and useable public open space in a clearly defined public realm, maximising biodiversity enhancements and sustainable transport solutions whilst providing an opportunity to permanently retain the physical separation of Newbury and Thatcham in conjunction with enabling development in this highly sustainable location.

Development proposals east of Waller Drive, Newbury have given due consideration to the nature of the local topography and have kept built form away from the higher ground in the northern section of our client's landownership, seeking to maximise new public open space opportunities in this location. The development proposals will contribute positively to the local character and will take references from the local architectural and landscape vernacular through the retention of the parkland character within the site. The proposed green infrastructure network within the site has sought to conserve and enhance existing biodiversity features and to create linkages between local features through the retention of existing boundary features, individual trees and the introduction of new woodland planting.

The provision of new woodland areas and other areas of recreation within the site will reduce pressure on neighbouring woodlands and contribute to the local character and sense of place in line with the opportunities raised within the Local and National Character Area profiles. Landscape buffers along the western and eastern boundaries of the site will include enhancement of existing boundary vegetation to help screen and soften views towards the site from neighbouring visual receptors.

Public footpaths passing through and directly adjacent to the site will be retained and buffered by including these routes within green corridors passing through development areas or including perimeter buffers to routes outside but adjacent to the site. This will maximise the potential for strengthening the local green infrastructure in accordance with draft Policy **SP10** 'Green Infrastructure' and will enable opportunities to increase pedestrian and cycle access across the site tying into the local network in accordance with draft Policies **SP23** and **DM42** 'Transport Infrastructure'.

Access to the land north of Turnpike Road is currently proposed via a priority junction west of the existing access to Tigers Day Nursery and Henwick Court complex. Sustainable infrastructure to contribute to the Council's aim to deliver carbon neutrality by 2030 will be incorporated into the development, including contributions towards public transport and enhancement of active travel routes to Thatcham and Newbury.

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
* Yes
* No

Yes

5. Independent Examination

Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.
Carter Jonas confirms that it wishes to take part in the oral part of the Local Plan examination to enable the explanation of our stance, to impart to the Inspector specific and relevant knowledge about West Berkshire, the land east of Waller Drive, Newbury, in addition to answering any questions that the Inspector may have.

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1736
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	Turley (Donnington New Homes) Full LPR Rep.pdf PS1736 Turley (Donnington New Homes) App 1.pdf PS1736 Turley (Donnington New Homes) App 2.pdf PS1736 Turley (Donnington New Homes) App 3.pdf PS1736 Turley (Donnington New Homes) App 4.pdf PS1736 Turley (Donnington New Homes) App 5.pdf PS1736 Turley (Donnington New Homes) App 7.pdf PS1736 Turley (Donnington New Homes) App 8.pdf PS1736 Turley (Donnington New Homes) App 9pdf.pdf PS1736 Turley (Donnington New Homes) App 6.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	No

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>[See attachment 'Turley (Donnington New Homes) Full LPR Rep'] for full response]</i></p> <p>1. Introduction</p> <p>1.1 These representations have been prepared by Turley on behalf of Donnington New Homes in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023).</p> <p>1.2 Our client has important land interests in the Local Plan area, in particular at land to the north of Newbury off Long Lane. The site was previously submitted for consideration as part of the Call for Sites consultation in 2017 together with an update in October 2019. Representations were also submitted to the December 2020 Emerging Draft consultation.</p> <p>1.3 The site has been considered in the Sustainability Assessment accompanying the Regulation 19 consultation under site reference CA15. This SA process, along with the approach to site selection in relation to the identified spatial strategy, is discussed later in these representations.</p> <p>1.4 We look forward to continuing to engage with the Local Plan Review process as it progresses.</p> <p>1.5 These representations are accompanied by the following plans and documents:</p> <ul style="list-style-type: none"> • Site Location Plan <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 1];</i> • Concept Masterplan <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 2];</i> • Opportunities and Constraints Plan <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 3];</i> • Preliminary Flood Risk Appraisal <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 4];</i> • Preliminary Landscape and Visual Baseline Appraisal <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 5];</i> • Preliminary Ecological Appraisal <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 6];</i> • Archaeological Desk-based Assessment <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 7];</i> • Transport Assessment <i>[see attachment 'PS1736 Turley (Donnington New Homes) App 8];</i> and

- Technical Note on Nutrient [see attachment 'PS1736 Turley (Donnington New Homes) App 9].

2. Land at Long Lane, Newbury (site reference CA15)

The site and surroundings

2.1 The site extends to an approximate area of 16.74ha occupying land which includes three agricultural fields separated by Long Lane (B4009) (see Site Location Plan at Appendix 1).

2.2 The site is situated approximately 2km north of Newbury town centre, and physically adjoins the edge of the settlement on the western field (10.17ha). The eastern field (6.57ha) is separated from the settlement by Shaw Cemetery. Both parcels are accessed directly off Long Lane B4009.

2.3 The western parcel comprises two agricultural fields separated by an access track serving Highwood Farmhouse. The Farmhouse is to the west of this parcel, which is also bounded by established mature vegetation (tree belt). There is a Public Right of Way along this boundary running north-south. The southern boundary abuts the rear of dwellings on Highwood Close. The eastern boundary abuts Long Lane and comprises hedgerows. The northern boundary abuts open countryside and also comprises hedgerows.

2.4 The eastern parcel to Long Lane narrows to the north of the site. The boundary to Long Lane comprises hedgerows, the southern boundary abuts Shaw Cemetery and is bounded by established vegetation. The eastern boundary abuts a disused railway line and dense vegetation. A Public Right of Way runs close to the southern portion of eastern boundary before diverting off to the north east. To the north of the parcel is a cattery and kennels, beyond which is open countryside.

2.5 An oil pipeline with 3m easement crosses the very southern end of this parcel. There is also a flood attenuation bund that has been constructed by West Berkshire Council along the southern boundary of the eastern parcel of land, to the south of the oil pipeline, known as the Cromwell Road Flood Alleviation Scheme.

2.6 The site lies fully in Flood Zone 1. The site is not subject to any statutory landscape or ecological designations. In terms of heritage assets, the site does not lie within or adjacent to a Conservation Area or contain or lie within the setting of any Listed Buildings or Scheduled Ancient Monuments.

2.7 The site is within walking distance of Trinity Secondary School and Sixth Form (1km to the west), St Joseph's Catholic Primary School (1.3km to the south), Shaw-cum-Donnington Primary School (1.5km to the west) and The Winchcombe School (1.6km to the south west), as well as local shops along Kiln Road. A bus service provides connections to Newbury Town Centre and West Ilsley.

2.8 Newbury is the main settlement in the District which has good rail, bus and road connections to Reading, Basingstoke and London.

2.9 The land parcels are under separate ownership but controlled by Donnington New Homes who are committed to bringing forward residential development on the site following an allocation through the Local Plan Review process.

2.10 New development here on any scale will need to be respectful and responsive to its context, aware of the need to maximise use of development land but protecting the special character of the surroundings. The proposals for the site have been developed in this context.

2.11 There are relevant planning permissions and site promotions to the north of Newbury that are in proximity to the Site:

- 75 dwellings approved at Coley Farm (to the east of the Site) – application reference 20/00604/FULEXT.
- Reserved matters approval for 401 dwellings to the west of Long Lane, north of Vodafone Headquarters – application reference 20/00048/RESMAJ.
- Reserved matters approval for 222 dwellings to the west of Long Lane, west of the A339 – application reference 18/03061/RESMAJ.

Technical Studies

2.12 A series of technical studies have been undertaken to inform the emerging proposals for the site and support its assessment by the Council as a suitable site for allocation for residential development. These were previously submitted to the Council at Regulation 18 stage in 2021, although their conclusions do not appear to have been fully used to inform the Council's own Sustainability Appraisal / site selection process.

2.13 These studies are summarised below.

Flood Risk and Drainage

2.14 A Preliminary Flood Risk Assessment has been prepared by Glanville (February 2021, see Appendix 4). From a flood risk perspective, the site is within Flood Zone 1 (low risk). There are areas of low to high risk of surface water flooding, which are across the centre of the sites, running north to south, as well as along ground depressions within the site boundary.

2.15 Development on the site provides opportunities to improve flood protection for both existing properties that have been affected by surface water flooding, as well as future occupants. Suitable provisions for the disposal of surface water and opportunities to increase flood storage offered by the Cromwell Road Flood Alleviation Scheme can be provided on-site. The SuDS features identified within the report would also provide effective nitrogen mitigation measures as well as ecology benefits to support biodiversity net gain.

2.16 The report concludes that the site can be developed without increasing flood risk on-site or elsewhere. Flood risk and drainage are not therefore considered to represent a constraint to development of the site.

2.17 The SA scoring for the site is negative, however our assessment is that this should be a positive impact for the reasoning above.

Landscape

2.18 A Preliminary Landscape and Visual Baseline Appraisal has been prepared by EDP (February 2021, see Appendix 5).

2.19 On the basis of a site walkover of the site and review of relevant planning policy and designations, there do not appear to be any in principle landscape and visual constraints to the development of the site, with effects on visual amenity and landscape character considered to be manageable through a well-designed scheme. There is no intervisibility between the Site and the North Wessex Downs AONB and it is considered there would be no effects on its setting due to distance and topography.

2.20 The site walkover and wider consideration of views has found that the greatest potential for views into the site are from the north and east. However, this view is seen in the context of north Newbury with the B4009 running through the site.

2.21 Overall, it is considered that the potential for adverse effects can be moderated by retention of distinctive landscape features, establishment of new boundary hedgerows to enhance the landscape structure and integration of sound principles underpinning a site-wide Green Infrastructure approach that contributes towards addressing the criteria of local and national policy requirements.

2.22 The SA scoring is uncertain for the protection and enhancement of multi-functional green infrastructure, and also for the conservation and enhancement of the character of the landscape. We consider these will be positive impacts as the proposed development can accommodate high-quality Green Infrastructure on-site, providing a range of benefits. Development can be designed to provide suitable landscape buffers to the north of the site in particular, with dwellings designed in a sensitive manner at a lower density.

Ecology

2.23 A Preliminary Ecological Appraisal has been prepared by The Landmark Practice (January 2021, see Appendix 6).

2.24 Designated sites are not considered likely to pose a constraint to its future development due to their distance and lack of functional links to the Site. A Phase 1 walkover survey mapped the habitats present and potential for protected species which would need to be confirmed through further survey work.

2.25 There are no Habitats of Principal Importance within the site. The site contains common low ecological value habitats. There are higher quality habitats surrounding the site therefore it is recommended that these are protected from development impacts.

2.26 It is not considered that development of the Site will result in significant negative ecological impact nor would the potential presence of any protected species be likely to preclude or significantly limit the capacity of the site to deliver housing, subject to a well-designed scheme.

2.27 The scheme will deliver a 10% biodiversity net gain on-site.

2.28 The SA scoring for the conservation and enhancement of the biodiversity and geodiversity of West Berkshire is negative. We consider there will be a positive impact for the reasoning above.

Transport

2.29 A Transport Appraisal has been prepared by David Tucker Associated (dated February 2021, see Appendix 8).

2.30 The report confirms access can be achieved off the B4009 into both parcels via and controlled by the promoter and public highway. All accesses can achieve local and national standards in terms of geometry, capacity, safety and visibility.

2.31 Trip generation for up to 260 dwellings forecasts less than 2 additional vehicles per minute during the morning and evening peak hours through junctions nearest to the site. This is unlikely to result in a material impact on highway safety or capacity.

2.32 The scheme is not dependent on a future link road from the B4009 to A339 coming forward.

2.33 The SA scoring for supporting health and active lifestyles, to improve access to education, health and other services, and to increase opportunities for walking, cycling and use of public transport is positive, which is agreed with. However, the SA scoring for reducing accidents and improving safety is negative. We consider this will be positive due to the reasoning above that the site can achieve safe and suitable access, with an acceptable level of traffic generation into the local road network that has capacity to accommodate this.

Archaeology/Heritage

2.34 An Archaeological Desk Based Assessment has been prepared by Thames Valley Archaeological Services (January 2021, see Appendix 7).

2.35 There are no designated heritage assets within the boundary of the site, and no in-principle constraints to its allocation and development have been identified.

2.36 The report considers there is potential that the Site was within the battlefield of the Second Battle of Newbury (1644) although this has not been formally defined. Several cannon balls are reported as having been found within the site. The wider area around the site contains limited evidence for prehistoric and Roman occupation mainly in the form of findspots and some undated cropmark evidence, moderate evidence for medieval activity and extensive evidence for post-medieval and modern occupation. LiDAR analysis has also identified several features of possible archaeological origin.

2.37 Further archaeological investigation to assess the potential of the site can be achieved through an appropriately worded planning condition.

2.38 On the basis of the above, there is no reason to believe that archaeological or heritage issues will constrain the deliverability and/or capacity of the site for residential development.

2.39 The SA scoring for the protection, conservation and enhancement of the built and historic environment to include sustaining the significant interest of heritage assets is negative. We consider this will be a neutral impact as there are no known heritage constraints relating to the site. Further archaeological investigation is required that can be suitably achieved through a planning condition.

Nutrient neutrality

2.40 A Technical Note on Nutrient Neutrality has been prepared by Glanville (dated January 2023, see Appendix 9). West Berkshire Council has issued guidance and a Nutrient Budget Calculator for the River Lambourn SAC specifically.

2.41 Thames Water have confirmed that foul water from any future development of the site will discharge to the Newbury STW Wastewater treatment works, which itself discharges into the River Kennet. As the River Lambourn is not the outfall for the treatment works, the site would not impact the nutrient load to the River Lambourn SAC.

2.42 Regarding surface water runoff, the potential nutrient load from the proposed development has been calculated using WBC's Nutrient Budget Calculator.

2.43 There is no SA scoring relating to nutrient neutrality.

The Proposed Development

2.44 The technical studies undertaken indicate that the site could accommodate approximately 260 dwellings. A Concept Masterplan indicating how the site could be developed is attached at Appendix 2.

2.45 The Concept Masterplan has been guided by the following factors:

- Retention of boundary vegetation for visual impact and ecological importance;
- Adjoining PRoW links;
- Existing residential properties/businesses;
- Surface water flooding area;
- Oil pipe and 3m easement;
- Overhead electricity pylons; and
- Topography and views into the site.

2.46 The developable area totals approximately 40% (6.83ha) of the site, with the remaining 60% (9.91ha) provided as green space which will be landscaped open space for existing and future residents to enjoy.

2.47 The Concept Masterplan illustrates how development of the site has been led by the landscape and ecological considerations, providing substantial areas of green space, part of which acts as SuDS features to improve the Cromwell Road Flood Alleviation Scheme.

2.48 Development parcels have been given sufficient buffers to boundary vegetation and Highwood Farmhouse. An area of lower density housing is proposed to the north of the western parcel, in a courtyard, barn-style residential cluster to ensure a sensitive edge to the north. There are green links between some development parcels, with area for a LEAP.

2.49 Vehicular access would be provided from both parcels onto Long Lane. There is a potential for a route to connect through to sites to the west, to eventually connect to the A339, if available in the future.

2.50 The framework has been drafted according to the following assumptions:

- The proposed housing mix will respond to local housing need and include a range of 2, 3 and 4 bedroom homes and include provision of affordable housing in accordance with proposed policies.
- Housing will range in scale and height between 2 and 2.5 storeys. No building on the site will be taller than 2.5 storeys.
- Detail with regards to materials, planting etc. will be dealt with at the application stages of the planning process, although design detail will seek to reflect the locality.

2.51 We consider that the development of the site would secure the following benefits:

- Housing Need - the site is capable of delivering approximately 260 high quality family homes, assisting in the delivery of new market and affordable housing that is capable of addressing local need in terms of type and tenure. The site can be brought forward for development quickly, by a well established local housebuilder and is capable of making an important contribution towards the immediate housing needs of the District during the early years of the plan period.
- Housing Mix and Choice – the site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community.
- Open Space - any new residential development will provide a strong landscape framework comprising new open space provision for formal and informal play and recreation providing opportunities embedded within green infrastructure. A housing development on the site would include permeable and legible pedestrian and cycle routes, linking through to the existing settlement of Newbury and to the Public Right of Way networking connecting to the surrounding countryside.
- Promoting Healthy Communities - the site is in an ideal location for residential development, immediately adjacent to the most sustainable settlement in the District and in close proximity to existing community facilities and services which are easily accessible by foot, and beyond this is Newbury Town Centre which provides access to key locations such as Reading, Basingstoke and London.
- Economy – the proposed development will provide a boost to the local economy during construction and operation.

3. Regulation 19 Proposed Submission document representations

Proposed residential site allocations

3.17 Having taken into account existing commitments and windfalls, the draft Plan proposes the delivery of 4,252 dwellings through specific housing allocations. The following allocations are retained allocations from the adopted Core Strategy and Site Allocation documents.

3.18 The following residential site allocations are proposed in Newbury and Thatcham:

Retained allocations:

- Sandleford Park, Newbury (SP16) – 1,500 dwellings
- Land at Bath Road, Speen, Newbury (RSA2) - 100 dwellings
- Land at Coley Farm, Stoney Lane, Newbury (RSA3) – 75 dwellings
- Land off Greenham Road, South East Newbury (RSA4) – 160 dwellings

- Land north of Newbury College, Monks Lane, Newbury (RSA1) – 15 dwellings

New allocations:

- North East Thatcham (SP17) – 1,500 dwellings

3.21 Some of the above allocations are retained from the previous adopted plan period of 2006 – 2026 due to the overlap of the plan period for the emerging plan (2022 – 2039). These amount to 2,652 dwellings that were outstanding from the previous plan period at 31st March 2022.

3.22 New sites proposed for allocation in the new plan period total 1,720 dwellings, which with 1,500 proposed at North East Thatcham.

3.23 The proposed allocated sites are listed in the table below, along with a review of their current planning status. We would question why some are retained as allocations, rather than commitments, given their planning status.

Retained allocation from Core Strategy: Sandleford Park, Newbury (Policy SP16) This is a site allocation being carried forward from the current adopted Local Plan for approximately 1,500 dwellings (current policy CS3).

Planning Status: Planning applications have been submitted to the Council however the site does not yet benefit from full planning permission. A large part of the site benefits from outline consent for 1,000 dwellings (submitted by Bloor Homes and Sandleford Farm Partnership, application reference 20/01238/OUTMAJ, allowed at appeal in May 2022 (ref. APP/W0340/W/20/3265460)).

The remainder of the allocation is under different land ownership (Donnington New Homes) and a live application for up to 500 dwellings (reference 18/00828/OUTMAJ) is pending determination.

1,580 homes have been counted for in the Council's housing supply position at 31st March 2022. It is unclear from the Council's Annual Monitoring Report 2022 and Five Year Housing Land Supply 2022 statements how many dwellings arising from the Sandleford allocation are anticipated to be delivered within the first 5 year period.

The AMR does acknowledge *"the timing of delivery is likely to be largely in the period post 2026"*.

Retained allocation from Core Strategy: Land north of Newbury College, Monks Lane, Newbury (site ref. HSA 1) This is a site allocation being carried over from the Housing Site Allocations DPD (adopted 2017) for approximately 15 dwellings.

Planning status: the site benefits from outline permission (application reference 19/00669/OUTMAJ) for 16 dwellings dated August 2019, and reserved matters approval dated January 2021 (application reference 20/00346/RESMAJ).

The AMR 2022 states that there is a delay in development due to a revised scheme incorporating additional land and increased number of dwellings.

Retained allocation from Core Strategy: Land at Bath Road, Speen, Newbury (site ref. HSA 2). This is a site allocation being carried over from the Housing Site Allocations DPD (adopted ay 2017) for approximately 100 dwellings.

Planning status: The site benefits from permission for a hybrid planning application (application reference 17/02092/OUTMAJ) dated February 2020 (comprising outline for up to 93 dwellings, and full application for 11 dwellings). 104 dwellings have therefore been permitted. A reserved matters submission has been made and is awaiting determination (application reference 22/01235/RESMAJ).

Retained allocation from Core Strategy: Land at Coley Farm, Stoney Lane, Newbury (site ref. HSA 3)

This is a site allocation being carried over from the Housing Site Allocations DPD (adopted at 2017) for approximately 75 dwellings.

Planning status: A full application has been approved in June 2021 (application reference 20/00604/FULEXT). Several conditions have been discharged according to WBC's online application search.

Retained allocation from Core Strategy: Land off Greenham Road, South East Newbury (site ref. HSA 4)

This is a site allocation being carried over from the Housing Site Allocations DPD (adopted ay 2017) for approximately 160 dwellings.

Planning status: The site benefits from reserved matters approval (application reference 20/02546/RESMAJ) dated February 2021 for 157 dwellings.

There is a S73 application currently pending determination (application reference 22/02046/RESMAJ), for variation of the approved plans.

3.25 The spatial strategy states that Newbury should be focus for growth, yet the proposed housing allocations do not accord with this strategy. We consider housing allocations should focus on the most sustainable settlements in the district, i.e. Newbury.

4. Sustainability Appraisal Scoring for Land at Long Lane, Newbury

4.1 Our client's Site is assessed under reference CA15 in Appendix 8b of the consultation documents, for 351 dwellings.

4.2 Fundamentally, there are **no significant negative effects identified**.

4.3 **Significant positive effects** have been identified in relation to:

- To maximise the provision of affordable housing to meet identified need
- To enable provision of housing to meet all sectors of the community, including those with specialist requirements
- To support healthy, active lifestyles
- To improve access to education, health and other services
- To increase opportunities for walking, cycling and use of public transport.

4.4 There are **uncertain** effects identified in relation to:

- *To reduce West Berkshire's contribution to greenhouse gas emissions*
- *To enable the protection and enhancement of high quality multi-functional GI across the District*
- *To support the development of access to IT facilities including Broadband particularly in rural locations*
- *To conserve and enhance the character of the landscape*
- *To reduce air pollution*
- *To manage noise levels*
- *To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage*
- *To reduce the consumption of minerals and promote reuse of secondary materials.*

4.5 The SA concludes:

"The site is likely to have an overall neutral impact on sustainability. Positive sustainability impacts are identified in relation to social sustainability as the site would help to meet local housing needs as well as being close to local services and facilities accessible by walking and cycling. Potential negative sustainability impacts have been identified in relation to environmental sustainability as the site is close to a number of ecological features, heritage assets, with a potential negative impact on the landscape. Negative impacts have also been identified in relation to environmental and social sustainability as the water network and possibly waste water network would need to be significantly upgraded to accommodate the development. A number of unknown sustainability impacts have also been identified. Many of these may be able to be mitigated but further would be needed to determine what would be required."

Sustainability Appraisal requirements and Council's approach

4.6 European Directive 2001/42/EC ("the Strategic Environmental Assessment Directive") seeks to ensure a high level of protection to the environment by integrating environmental considerations into the process of preparing relevant Plans and Programmes.

4.7 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI1633) ("the Regulations") implement the Strategic Environmental Assessment Directive. We note as follows so far as the requirements of a Sustainability Appraisal are concerned:

- a. Regulation 8 of the Regulations prohibits a Plan being adopted until certain requirements in other regulations have been complied with;
- b. Regulation 12 requires an environmental report "to identify, describe and evaluate the likely significant" environmental effects of implementing the Plan, and of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme";
- c. The report has to include such of the information set out in Schedule 2 as is reasonably required, including "an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties...encountered in completing the information."

4.8 The NPPG considers the Sustainability Appraisal process in detail. It states the following (our underlining)

“Reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach (when developing alternatives, paragraph 152 of the National Planning Policy Framework should be referred to).” (Paragraph: 017 Reference ID: 11-017-20140306)

4.9 In this context, paragraph 018 of the PPG (Reference ID: 11-018-20140306) records, then, as follows so far as the comparison with reasonable alternatives is concerned:

“The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).

Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.

The development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals (when preparing a Local Plan, paragraph 152 of the National Planning Policy Framework should be considered).”

4.10 The above plainly require consideration of all reasonable alternatives on a fair and equal basis. The Sustainability Appraisal lamentably fails to achieve this.

4.11 Paragraph 32 of the NPPF, referred to above, states as follows under the heading *“Preparing and Reviewing Local Plans”*:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”

4.12 The failure of the Council to have considered ‘reasonable alternatives’ in terms of other sites located at the highest tier settlement, instead of AONB and other less sustainable sites is a fatal failure of the Sustainability Appraisal in the light of the above legislative requirements, PPG guidance, NPPF, and case law. As such, it is difficult to understand how the Council assessed reasonable alternatives from the beginning of the plan making process and considered that the proposed strategy was the most appropriate.

Precedent and case law

4.13 The failures of the SA process have been considered through the Courts on a number of occasions, and there is a risk that the approach that the Council has taken to date puts the emerging Plan at risk.

4.14 In *Save Historic Newmarket Ltd v. Forest Heath District Council* [2011] J.P.L. 1233 (which pre-dated the clarity provided in the NPPG/F), the High Court quashed parts of the Forest Heath Core Strategy, where there was a very marked lack of coverage and assessment of reasonable alternatives and increases to housing provision, and a complete failure in terms of explanation as to why the nominated alternatives had been rejected.

“40. It was not possible for the consultees to know from it what were the reasons for rejecting any alternatives to the urban development where it was proposed or to know why the increase in the residential development made no difference. The previous reports did not properly give the necessary explanations and reasons and in any event were not sufficiently summarised nor were the relevant passages identified in the final report. There was thus a failure to comply with the requirements of the Directive and so relief must be given to the claimants.”

4.15 Following the case of *Heard v. Broadland District Council, South Norfolk District Council, Norwich City Council* [2012] EWHC 344 (Admin) (See, in particular: paragraphs 56-57, 62-66, and 70-72 of the judgment, the court considered the ‘reasonable alternative’ requirements and referred to the PPG paragraphs detailed above. In this case, the judge was concerned about an imbalanced assessment, where the alternatives received merely notional treatment. The judge held at [71]:

"the aim of the directive, which may affect which alternatives it is reasonable to select, is more obviously met by, and it is best interpreted as requiring, an equal examination of the alternatives which it is reasonable to select for examination alongside whatever, even at the outset, may be the preferred option. It is part of the purpose of this process to test whether what may start out as preferred should still end up as preferred after a fair and public analysis of what the authority regards as reasonable alternatives. I do not see that such an equal appraisal has been accorded to the alternatives referred to in the SA of September 2009. If that is because only one option had been selected, it rather highlights the need for and absence here of reasons for the selection of no alternatives as reasonable. Of course, an SA does not have to have a preferred option; it can emerge as the conclusion of the SEA process in which a number of options are considered, with an outline of the reasons for their selection being provided. But that is not the process adopted here"

4.16 In *Ashdown Forest Economic Development Lp v SS Communities & Local Government & ors* [2014] EWHC 406 (Admin), the claimants sought to extend similar arguments to those pursued in *Save Historic Newmarket and Heard*, to an extent that was considered inapplicable and impermissible by the court in that particular case. A fuller excerpt is helpful:

"90. I turn, then, to Mr Elvin's two criticisms of what was done by WDC. As to the substance of the work to be done by a local planning authority under Article 5 in identifying reasonable alternatives for environmental assessment, the necessary choices to be made are deeply enmeshed with issues of planning judgment, use of limited resources and the maintenance of a balance between the objective of putting a plan in place with reasonable speed (particularly a plan such as the Core Strategy, which has an important function to fulfil in helping to ensure that planning to meet social needs is balanced in a coherent strategic way against competing environmental interests) and the objective of gathering relevant evidence and giving careful and informed consideration to the issues to be determined. The effect of this is that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives which should then be examined in greater detail."

4.17 This judgement provides additional clarity on process. The difficulty with the SA is that there simply has been no reasonable alternative site selection process set out. Given the above, the SA fails to clearly identify the options which have been selected and also any reasonable alternatives, let alone why they have been discounted. It therefore does not state any sound reasons within the Sustainability Appraisal for the decisions reached in preparing the draft Plan.

SA Scoring of Long Lane Site

4.18 In the context of the foregoing, the Council's scoring within its Sustainability Assessment is not fully supported by our client. It appears that the previously supplied technical work has not informed the Council's assessment.

4.19 We have consequently undertaken our own assessment against the SA criteria, which is set out below:

[for table see pages 23 to 28 of attachment 'Turley (Donnington New Homes) Full LPR Rep']

Conclusions on site selection and SA

4.20 We consider that the LPR Sustainability Appraisal ("SA") has therefore not considered reasonable alternative options, which is inarguable given the omission of any consideration of sites not included within the Plan. The SA is therefore in breach of the SEA Directive and the SEA Regulations and these breaches are fatal to the legality of the LP.

4.21 Additionally, it calls into question the entire site selection process if a site has been assessed and rejected for technical reasons when no legitimate and substantiated technical reasons exist to justify such an outcome. This, we submit, suggests that the entire site selection process is fundamentally flawed, particularly given the conflict with the identified spatial strategy.

4.22 The draft Plan proposes sites in the AONB, and the eastern area which does not accord with the Council's spatial strategy.

4.23 There are only two strategic site allocations (SP16 Sandleford Park and SP17 North East Thatcham), the remainder are relatively small sites (between 15-160 dwellings). The Sandleford Park allocation has outline planning permission allowed at appeal for two-thirds of the allocation. The remainder of the site is under Donnington New Homes' ownership and there is a live planning application pending determination (reference 18/00828/OUTMAJ).

4.24 It is considered the plan does not propose medium sized sites that can come forward in the interim period to ensure housing delivery. The site at Long Lane for approximately 260 dwellings can provide a

	<p>medium sized site that is available and deliverable under land controlled by Donnington New Homes. The SA conclusions state that the negative and uncertain effects may be able to be mitigated further. It is considered the uncertain and negative effects identified in the SA can be overcome through a well-designed scheme and submission of information, resulting in positive impacts.</p> <p>4.25 The planning merits of the Site considered in section 2 of these representations demonstrate that there are no in-principle technical barriers to prevent residential development of the site.</p> <p>6. Summary and Conclusions</p> <p>6.1 These representations have been prepared by Turley on behalf of Donnington New Homes in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023).</p> <p>6.2 We reiterate that Newbury is the largest settlement in the District and is able to support residential growth to support the district's housing needs. The strategy set out in the Plan is supported, however the proposed site allocations are not varied enough to deliver the District's housing need in the short to medium term. There is an over-reliance on the two strategic sites coming forward, one of which (Sandleford Park) has been slower to come forward than anticipated in the previous plan period.</p> <p>6.3 In order to ensure an ongoing sufficient supply of land, further sites should be allocated for development.</p> <p>6.4 Land at Long Lane, Newbury is a sustainable and deliverable site, with the parcels in separate land ownership but under single control by Donnington New Homes. There are no identified technical barriers to development.</p> <p>6.5 The site is of a scale that it can contribute residential development of an appropriate scale to the context of Newbury. It is a medium sized site that can deliver in the short to medium term, on the edge of the existing settlement in a sustainable location and a logical extension to meet housing need. The SA acknowledges that the site is within walking and cycling of local services and facilities.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	<p>6. Summary and Conclusions</p> <p>6.6 The site is of a scale that it can contribute residential development of an appropriate scale to the context of Newbury. It is a medium sized site that can deliver in the short to medium term, on the edge of the existing settlement in a sustainable location and a logical extension to meet housing need. The SA acknowledges that the site is within walking and cycling of local services and facilities.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1340
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Support. (in relation to Sandlesford Park East) The policy specifies that the Sandlesford Park Strategic Allocation is retained for “approximately 1500 dwellings”. This correctly directs development towards the most sustainable settlement in the district, in line with policies SP1 Spatial Strategy and SP3 Settlement Hierarchy. The estimated number of homes to be provided reflects detailed site assessment work undertaken by Bloor Homes on its site ‘Land at Sandlesford Park’ and information in the public domain for the Sandlesford Park West developer. Subject to the submission and grant of planning permission for Reserve Matters, the site is realistically deliverable within the plan period.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	BBOWT
Consultee Full Name	Daniel Tritton
Consultee Organisation	BBOWT
Agent Full Name	
Agent Organisation	
Comment ID	PS1251
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham

Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	BBOWT welcomes the removal of Land adjoining New Road, Newbury (HELAA site ref: GRE6) from this list as this proposal looked likely to have significant impact on the nearby ancient woodland.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Commercial Estates Group (Represented by Woolf Bond Planning)
Consultee Full Name	Commercial Estates Group
Consultee Organisation	Commercial estates Group
Agent Full Name	Mr Steve Brown
Agent Organisation	Woolf Bond Planning
Comment ID	PS1290
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:25:00
Attached Files	Woolf Bond Planning (CEG) Appeal decision.pdf Woolf Bond Planning (CEG) St Albans LP.pdf (1) Woolf Bond Planning (CEG) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	As detailed in the accompanying statement, the Plan as prepared is not legally compliant as the Sustainability Appraisal/Strategic Environmental Assessment has not considered reasonable alternatives, especially non-strategic sites of less than 1,000 dwellings around Newbury/Thatcham.
2. Do you consider the Local Plan Review is sound? -	No

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Draft Submission Local Plan includes a number of proposed housing allocations at Newbury and Thatcham, which are intended to contribute towards achievement of the minimum requirements for the district as detailed in policy SP12.</p> <p>For the reasons detailed in the representation to draft policy SP12, insufficient land has been identified to address the needs.</p> <p>The current draft policy SP12 indicates that the District's minimum housing need over the period April 2022 to March 2039 is for between 8,721 and 9,146 dwellings.</p> <p>The supporting text of policy SP12 outlines the sources which the Council relies upon to address the majority of its housing needs. This indicates that existing known sources will provide 7,337 dwellings.</p> <p>Paragraph 6.21 notes that to address the highest figure in the housing requirements range (9,146 dwellings), sites for at least 1,809 dwellings must be found.</p> <p>Paragraph 6.22 indicates that policies SP13-15 propose the allocation of sites for some 1,720 dwellings with a further 80 dwellings through Neighbourhood Plans (paragraph 6.23). This is a total of 1,800 dwellings which is marginally below the minimum 1,809 dwellings required.</p> <p>Once the housing requirement is adjusted to reflect our representation to policy SP12 (an increase of 988 dwellings) from the highest figure in the council's range (9,146 dwellings) between 2022 and 2039 to at least 10,134 dwellings from 2022 until 2040, the sources of supply relied upon by the Council are insufficient. This therefore justifies an increase in the number of homes allocated.</p> <p>Additionally, within the draft Plan, the Council expects delivery of over 3,000 dwellings from two strategic sites – the retained Sandleford site from the current Core Strategy where 1,580 dwellings are envisaged in the Plan period (policies SP13 and SP16) and a new strategic allocation to the north east of Thatcham for 1,500 dwellings in the Plan period (Policies SP13 and SP17).</p> <p>Whilst the provision of over 3,000 dwellings across these two sites alongside other sources around Newbury and Thatcham ensure a significant proportion of the district's housing is delivered adjoining these settlements at the top of the hierarchy, there is a clear concern regard the over reliance on strategic sites of over 1,000 dwellings, especially for growth in around these settlements.</p> <p>The Sandleford site has a poor record of delivery with the Core Strategy envisaging (Policy CS3) that at least 1,000 dwellings would have been completed by March 2026. However, the Council's latest trajectory (the 5 year land supply assessment for April 2022) now indicates that only 100 dwellings will</p>

be completed by March 2026. This is a reason for the rephrasing of the site within the emerging plan period.

The Sustainability Appraisal (December 2022) considered a variety of options for delivering growth as summarised in Table 11, which included a continued focus of Newbury (option 4) separately to a focus on Thatcham (option 5).

Further growth at Newbury was discounted as “further large scale development opportunities are more limited” and “there was an unknown impact as to whether the strategy would be able to deliver adequate housing to meet the identified need due to the lack of suitable sites within the area”.

However, this analysis and the subsequent evolution of the plan discounted the potential of a mixed portfolio of sites around the settlements of Newbury and Thatcham rather than its reliance upon strategic sites, especially having regard to the challenges which have impacted upon Sandford's development.

The failure of the Sustainability Appraisal to adequately consider a mix of sites rather than a focus on larger scale development was one of the reasons why the Local Plan prepared by the City and District of St Albans failed at its examination. Whilst this was generally with regard to consideration of Green Belt matters, as paragraph 44 of the Inspector's Post Hearing Letter (14th April 2020 (copy enclosed)) confirms:

We accept that large scale urban extensions would provide significant amounts of new infrastructure which both the new and already established communities would benefit from. On the other hand, a range of sites including smaller sites could also provide benefits. For example, they could be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and secure affordable housing more immediately.

This provides a clear indication of the need for the plan to actively consider a range of scenarios of sites including both strategic and a portfolio of small and large ones, such as the delivery of 400 dwellings on our client's land (HELAA Ref: SCD4).

The provision of 400 dwellings on our client's site would make a valuable contribution towards addressing the Council's identified need for 1,809 dwellings without reliance upon 1,500 dwellings at North East Thatcham. It would also provide greater flexibility should the Council's expectations of delivery from other sources be unrealistic, reflecting that which has occurred to date at Sandford.

Recognising that Newbury and Thatcham are appropriately included in the top tier of the district's settlement hierarchy (in draft policy SP3), this is therefore an appropriate location for further growth. This is covered further in the representation concerning the omission of our clients land to the north of Newbury (either side of the A339) as an allocation for around 400 dwellings.

In order to be consistent with the amendments advocated elsewhere in these representations it is essential that the policy is revised to ensure that it reflects the changes associated with the allocation of land north of Newbury, on either side of the A339 for the delivery of around 400 dwellings.

This change also need to be evaluated through the SA since as currently drafted, it has failed to consider the reasonable alternative of a mix of sites such as that controlled by our clients for around 400 dwellings within a wider portfolio around Newbury. This is therefore a matter of legal compliance, consistent with the conclusions of the Inspector who examined the St Albans Local Plan.

Omission Site

As explained above, there is a need to allocate additional land for housing development in order to meet identified needs. Providing for further housing allocations at Newbury is consistent with the aims of the NPPF in seeking to plan for sustainable patterns of growth.

Our client's site comprising land north of Newbury (either side of the A339) (within HELAA Site Ref: SCD4) is edged red on Plan WBP1 attached and extends to approximately 15.7ha. It comprises two land parcels, straddling land currently under construction (allowed at appeal in March 2017).

The northern most extends to around 4.7 ha and is illustrated below.

<for map see attachment>

The eastern parcel extends to around 11ha as illustrated below

<for map see attachment>

We have undertaken a thorough assessment of the character of the two parcels of land and surrounding area and consider that combined it affords a sustainable development opportunity for approximately 400 dwellings.

The site is well related to the urban area of Newbury, especially having regard to development which has been approved to the north of the town along the A339 corridor which has either been built (the Vodafone HQ) or is under development (401 dwellings, local centre and 1 form entry primary school granted on appeal on 20th March 2017 (footnote 12)).

HELAA Assessment

Whilst the HELAA's assessment of the wider parcel ref SCD4 concluded that it was “potentially developable in part” this is the same classification of other locations which the Council has included as allocations i.e land to the north-west of Thatcham (within policy SP17). However, for the reasons detailed below, it is concluded that the Council's assessment is flawed and had the evidence for the Plan been robustly prepared, the overall strategy would have included our clients land as an allocation for 400 dwellings.

The inclusion of our client's land would contribute towards resolve the concerns regarding the inconsistency of both the current plan target and period (within objections above to policy SP12) with the NPPF.

Within the HELAA, the Council appraises each parcel of land under a number of different steps. Our response to the Council's flawed assessment within each step is detailed below.

For Steps 1a (Site Identification) and 1b (Automatic Exclusion), we concur with the

Council that wider parcel SCD4 is appropriate for a detailed assessment through the subsequent steps.

For Step 2a (Development potential), whilst the assessment notes that the parcel adjoins a settlement boundary, it concludes that this is “Donnington” and it subsequently notes that “Donnington falls outside of the settlement hierarchy and is therefore suited for limited development”.

However as confirmed in paragraph 13 of the appeal decision for the erection of 401 dwellings on part of SCD4, it was agreed that “the appeal site is outside, but partly adjacent to, the Newbury settlement boundary”. This position is re-affirmed in paragraph 21 of the appeal decision which states “although the appeal site is outside the settlement boundary it is next to it, and the Council agreed that it is adjacent to Newbury”.

Therefore, within Step 2a, the initial assessment of the site is inconsistent with the Council's agreed position through the appeal. This flawed assessment of the site which discounts its location adjacent to Newbury (a settlement at the top of the hierarchy) is then continued through subsequent steps. Whilst this resulted in the conclusion that the site was potentially developable, had the assessment been robust at initial stages it would have clearly been confirmed as an allocation.

Such an approach would reflect the history of the evolution of the existing Core Strategy for West Berkshire as summarised in paragraphs 22 and 23 of the March 2017 appeal decision, which states as follows:

- 1 CS policy ADPP2 states that Newbury is intended to accommodate around 5,400 homes over the plan period, and refers to urban extensions at Newbury Racecourse and Sandford Park. It also contemplates other development coming forward through (amongst other mechanisms) the allocation of smaller extensions to the urban area through the HADPD. The appeal site has not come forward by any of the mechanisms envisaged in ADPP2 and, as a consequence, the proposal is in conflict with this aspect of the policy. The HADP also states that a number of sites which have future potential for development have been identified in the Strategic Housing Land Availability Assessment (SHLAA).
- 2 There are a number of factors which must be balanced against this conflict with policy ADPP2:
 - The appeal site has been considered through the SHLAA process in 2011 and 2013 – an approach which was noted in policy ADPP2. Both these SHLAA assessments identified the appeal site as potentially developable. The 2013 SHLAA noted that it was in a basket of sites from which the most suitable would be allocated through the development plan process. However as a potential strategic site, the appeal site is outside the scope of the HADPD, as noted in the relevant Sustainability Appraisal. Nevertheless, the potential of the appeal site is clearly recognised.
 - CS policy CS1 makes reference to at least 10,500 new homes coming forward in the plan period, but the Council accept that this figure is out of date as a requirement for FOAN or five year housing land supply purposes. In addition the approach of the CS Inspector appears to have been that the plan did not provide for all housing needs even at that time, but adopted a pragmatic approach and recommended the adoption of the plan as it stood and encouraged an early review. This approach further reduces the weight which can be accorded to the CS housing and settlement policies.
 - As mentioned above, the area around the appeal site was considered during the CS Examination process. The Examining Inspector noted that there was a choice to be made between Sandford Park to the south of Newbury and the area north of Newbury (including the appeal site). This was in addition to the development at Newbury Racecourse for which planning permission had already been granted. A number of the concerns which were identified related to the north of Newbury area were apparently not fully investigated by the Council at that time, although the Inspector described highway matters and flood risk as not being ‘show stoppers’. However, on balance, the Sandford Park site was preferred as it was stated that there was not the evidence to demonstrate that north Newbury was a clearly preferable site. Overall, the Examining Inspector stopped well short of recommending that there were problems associated with the north Newbury area, although preference was given to Sandford Park.
 - I heard detailed and uncontested evidence that the Sandford Park site is experiencing substantial delays. No party was able to suggest how or when this major development might progress. Before the Council's withdrawal from the Inquiry, the authority had accepted that completions at this site could not be expected in the next five year period – or perhaps longer. Under these circumstances this loss of around 1000 units makes the achievement of even the limited CS target highly optimistic.
 - As noted, the appeal site was in the basket from which the SHLAA envisaged that the most suitable would be allocated through the development plan process. The Council, before withdrawing its opposition to the appeal scheme, accepted that there were no sites of comparable scale which might be preferable and/or more sustainable than the appeal site. In effect, even if the development at Sandford Park were to progress more rapidly than the evidence indicates, the appeal site is next in line to meet the housing needs of the area.
 - There is nothing to suggest that, even if the CS figure of approximately 5,400 dwellings were exceeded, this would cause any harm. There is nothing to suggest that the figure was envisaged as a cap on development, as was made clear by the CS Inspector.

It is therefore clear that the Council had previously accepted that further development to the north of Newbury was appropriate.

For Step 2b (Suitability), under relevant planning history it states:

Planning applications:

Planning permission was allowed at appeal for a mixed use scheme of up to 401 dwellings, a local centre, a one form entry primary school, and public open space on adjacent landholdings (planning app ref: 14/02480/OUTMAJ).

Local Plan history:

Parts of the site (the southern part of the parcel of land that lies to the west of the A339 and the western part of the parcel of land which lies to the east of the A339) were assessed in the 2013 Strategic Housing Land Availability Assessment (Strategic Housing Land Availability Assessment, whereby it has the site refs NEW031A and NEW031B) as ‘potentially developable’.

The site was subsequently assessed in more detail as part of work on the Housing Site Allocations Development Plan Document (Housing Site Allocations Development Plan Document). It was ruled out as an allocation because the site needed to be considered as a strategic site, which was outside of the scope of the Housing Site Allocations Development Plan Document.

The site selection work also identified that there were a number of issues relating to highways and access that would need to be overcome in order for development on the site to be acceptable. The relationship between the two areas of the site was also a concern given the only link between the sites is via an underpass under the A339 which suffers from flooding.

The assessment of the site as noted references a number of points, first a need for it to be considered as a strategic site which whilst outside of the scope of the Site Allocations Plan is clearly within the remit of the new Plan. However, this has not been undertaken for the current plan.

The planning history also references concerns over highways, site access and flooding matters with the underpass which linked the two parts of the site. However, these were matters considered by the Inspector in determining the appeal on the site.

With regard to highways and site access, this is covered in paragraphs 36 and 37 of the appeal. These state:

- 1 The highways consequences of the proposal were summarised in the HSOCG in relation to a number of junctions in the vicinity, the most critical of which is the Robin Hood gyratory to the south of the entrances to the appeal site. Local residents gave clear evidence of the difficulties which this junction currently causes. However a mitigation scheme, full funded through the UPO, has been put forward for that junction and has been tested against various scenarios. The conclusion of the analysis is that the scheme would do more than mitigate the effects of the proposal and would improve the operation of the junction compared to the 2021 Base Case scenario (i.e. including committed development and the scheduled gyratory improvements).
- 2 There was also concern from some residents that the proposal would generate traffic along Love Lane which, as I saw on my visit, has recently had chicanes installed. However, although I can appreciate that Love Lane may well be currently used as a rat run between Shaw Hill and Oxford Road, there is no evidence that this would be substantially increased as a result of the proposal, as new residents would access the development direct off the A339.

For flooding matters and any other concerns regarding the underpass, this is within paragraphs 33 to 35 of the appeal decision. These state:

- 1 The design and safety of the underpass, and the consequent extent to which the two parts of the development would be linked in a satisfactory manner was the subject of concern for some residents, although the local cycling group's position was that it would provide a very good route. This matter was originally a reason for refusal and was the subject of evidence for the Council until the authority changed its overall position on the scheme.
- 2 The proposed underpass is short, the paths approaching it are in a relatively straight line, and the limited slope means that the visibility into and through the underpass is good, as I saw on my site visit. Visibility and safety could be further improved when the details of the development were being considered. The evidence is that the dimensions of the underpass comply with Sustrans guidance and the underpass, with improvements, would provide an appropriate and safe link for pedestrians and cyclists alike. The proposal would not conflict with the Quality Design SPD and the two parts of the site would be linked in a manner which would encourage the use of non-car modes of transport.
- 3 The footpaths around the Vodafone site, which provide access towards the town centre from the eastern parcel and, via the underpass, from the whole of the development, were also originally criticised by the Council. However as I saw on my site visit, these are wide paved routes and I saw that they were apparently well used by Vodafone employees. I see no reason why they should act as a deterrent to cyclists or pedestrians wishing to access the town centre.

Although the HELAA includes reference to planning history, it is clear that it has not been updated to reflect the accepted position as detailed in the appeal on the site. The Council has not provided any reasons for departing from the agreed position at the appeal and therefore the wider SCD4 land should have been favourably considered and then included as an allocation.

Within the "Location" category for step 2b, the HELAA assessment of parcel SCD4 states:

The eastern land parcel is adjacent to the settlement of Newbury, whilst the western land parcel is adjacent to the settlement of Donnington.

Newbury is identified as an Urban Area in the settlement hierarchy. Urban Areas have a wide range of services and are to be the focus for the majority of development.

Donnington does not fall within the settlement hierarchy, and is instead identified as a 'smaller village with a settlement boundary'. Such settlements are suitable only for limited infill development subject to the character and form of the settlement.

Western parcel of land – the south western corner of the site adjoins the settlement boundary.

Eastern parcel of land – a small area of the southern site adjoins the settlement boundary of Newbury.

As noted, the above assessment contrasts with the position agreed by the Council on the appeal.

With regard to landscape and harm to the AONB, no concern is raised.

The Step 2b assessment notes that flooding is not a constraint for the site,

For ecology, although it is within the River Lambourn Neutrality Zone, there would be the potential for mitigation measures. A suitable off-setting will ensure the protection of the Ancient Woodland adjoining the site, reflecting the approach of the Draft Plan for other sites.

With respect of landscape, it notes that a further assessment is required.

For heritage, it notes that there is a need to establish extent that development could affect the historic significant of the Grade II Listed Barn at Shaw Farm. This could readily be achieved and addressed through the submission of an application.

The overall conclusions on suitability within Step 2b were:

Development would impact on the character and identity of Donnington. Further landscape assessment required. Highways concerns, particularly if the access for the eastern land parcel via The Connection is not upgraded from a private road to adoptable standards, and a route through CA15 to the B4009 is not provided.

Surface water flow paths within the site. Flooding was reported in the eastern land parcel during the July 2007 flood event.

The site is located within the River Lambourn Nutrient Neutrality Zone, and residential development could result in additional nutrient loads that could have an adverse effect on the condition of the River Lambourn SSSI/SAC. Mitigation measures needed. A Habitat Regulations Assessment would be required supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment.

High risk of adverse nature conservation impacts. Additional ecology surveys required.

Allocation would be dependent on a review of the settlement boundaries in the Local Plan Review.

It is therefore clear that the site has development potential.

Step 2c provides an assessment of availability. The whole area of parcel SCD4 was confirmed to be available. This remains the case and therefore this would not limit development of the site.

The Achievability of the site was considered in Step 2e. This confirms that the site is achievable.

The deliverability potential of the site is within Step 2e. The conclusions on this subject was:

The site is available (in single ownership, and there is an option agreement with a developer) and achievable as there are no known market, legal, cost, ownership fragmentation or delivery issues. Development would impact on the character and identity of Donnington. Further landscape assessment required.

Highways concerns, particularly if the access for the eastern land parcel via The Connection is not upgraded from a private road to adoptable standards, and a route through CA15 to the B4009 is not provided.

Surface water flow paths within the site. Flooding was reported in the eastern land parcel during the July 2007 flood event.

There are a number of factors which would need to be investigated further to confirm that the site is developable - the site is located within the River Lambourn Nutrient Neutrality Zone, and residential development could result in additional nutrient loads that could have an adverse effect on the condition of the River Lambourn SSSI/SAC. Mitigation measures needed. A Habitat Regulations Assessment would be required supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. High risk of adverse nature conservation impacts. Additional ecology surveys required.

Whether the site is considered developable is also dependent on further assessment through the plan-making process, in relation to whether circumstances exist to support the change to the settlement boundary.

The site was considered to be potentially development in part. Such an assessment is reflective of other parcels which have been included as allocations.

Overall, the site has no physical constraints, and is well-related to the existing residential development. It is in close proximity to local services and facilities such that it affords a sustainable location in helping to meet identified housing needs whilst providing for sustainable patterns of growth.

Whilst additional growth at Newbury was considered during the earlier stages in the preparation of the Local Plan (Option 4 of the Spatial Strategy Options summarised in Table 11 of the SA/SEA) (November 2022), it notes:

This option gives a number of potentially positive sustainability effects in relation to focusing development on the biggest town with the largest number of facilities, with a significantly positive effect predicted due to the strategies' focus on the use of brownfield and. However, there are is an unknown impact as to whether the strategy would be able deliver adequate housing to meet the local identified need due to the lack of suitable sites within the area.

However, the Council has accepted the development at north Newbury on our clients land would be feasible. Whilst the Council discounted a strategic scale development in Newbury, there is no reason why a proposal for around 400 dwellings could not be delivered within the Plan. The document as currently drafted has failed to consider this as an integral part of its strategy.

Given the clear need for additional housing and its location as a logical extension to Newbury, the site should be included as a further allocation for around 400 dwellings.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>To ensure a sound Local Plan, land to the north of Newbury (either side of the A339) should be included as a residential allocation for circa 400 dwellings, with consequential amendments to settlement boundaries.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To explain why the plan is unsound and requires the inclusion of the allocation of land north of Newbury (either side of A339) for housing.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sulham Estate (Represented by Barton Willmore now Stantec)
Consultee Full Name	Mr Henry Scutt
Consultee Organisation	Sulham Estate
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1640
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	Yes

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Within our representations to the Regulation 18 Consultation, we commented that we disagree with the Council's approach of relying on larger sites and ruling out sites within smaller settlements and only allocating sites which fall within the service villages, rural service villages or urban areas. The Regulation 19 Draft Local Plan follows suit in its approach to allocating sites for housing development, as evidenced by the allocated sites Sandford Park (1,500 dwellings) and North-East Thatcham (1,500 dwellings).</p> <p>Whilst the principles of delivering large sites with accompanying infrastructure is supported by national planning policy, and we do not object to these allocations, we raise concern that the numbers suggested may not be delivered in accordance with the Council's housing trajectory. In particular with the large allocations, substantial infrastructure will need to be delivered prior to any housing delivery. Increased small and medium scale sites would complement these larger sites by ensuring a constant stream of delivery whilst larger sites start to mobilise.</p> <p>As such, we maintain that the Council should seek to accommodate further growth across the district. Hall Place Farm, Tilehurst (TIL18) which would deliver approximately 80 dwellings is of a scale and within a location which the Council should be seeking to allocate. Due to the medium scale of development and edge of settlement location, the site can be delivered in the short to medium term utilising existing infrastructure including public transport, schools and local shops.</p> <p>The need for further small/medium sized sites to compliment the delivery of larger sites is also compounded by the need for an increased housing target and the necessity for further allocations in order to meet this target.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>Based on the comments above, we request the following:</p> <ul style="list-style-type: none"> - The Council to allocate additional small / medium sites to ensure a consistent delivery of homes in accordance with the Council's housing trajectory. <p>The above will ensure that this approach is 'effective', 'justified' and 'consistent with national policy.'</p>
<p>5. Independent Examination - If your representation is seeking a</p>	Yes

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1529
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Croudace Homes Combined Appendices.pdf Representations on behalf of Croudace Homes.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>[For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>Proposed New Allocations</p> <p>The LPR proposes to allocate nine new sites for residential development to bring forward an estimated 1,720 units. It also delegates the allocation of land for 80 units upon adoption of two respective Neighbourhood Plans.</p> <p>North East Thattham Strategic Site (Policy SP17)</p> <p>The largest of the proposed draft allocations is 'North East Thattham', identified to deliver 1,500 units across the plan period.</p> <p>Whilst Croudace generally supports the direction of a large amount of growth to Thattham, it does have ongoing concerns regarding the deliverability and developability of North East Thattham. On this basis, the Council should allocate smaller, unconstrained sites which can come forward early on in the plan period without requiring much in the way of supporting infrastructure.</p> <p>However, should the draft allocation at North East Thattham ultimately remain, Croudace considers that there is still a scenario in which there is a need to allocate additional sites around Thattham to alleviate some of the pressures on supply arising from elsewhere in the District and to provide additional flexibility for a 'top tier' settlement in the earlier part of the plan period. Sustainable sites such as Henwick Park, which are not subject to any constraints and do not require any large scale infrastructure interventions to ensure delivery, are very well placed in the short-term to deliver development on land which is directly adjacent to the settlement boundary.</p> <p><u>North East Thattham – Spatial Matters</u></p> <p>Despite acknowledging that Thattham is a focus for strategic growth, the Council proposes to allocate one single site at North East Thattham. Land is identified for an urban extension to deliver approximately 1,500 dwellings across the plan period. Draft Policy SP17 requires the site to be masterplanned and delivered comprehensively along with key infrastructure including community uses, green infrastructure and transport and the achievement of high standards of sustainability.</p> <p>By way of context, the Regulation 18 stage LPR identified North East Thattham for the delivery of 2,500 dwellings and associated infrastructure. As such, there has been a theoretical reduction of 1,000 dwellings. However, Croudace notes that the proposed allocation boundary (shown both within the draft Proposals Map and on page 65 of the LPR) has not been amended accordingly to match the reduction. Croudace therefore assumes that as currently drawn, the amended settlement boundary for Thattham will also extend in a similar manner.</p> <p>As such, Croudace objects to the extension of the settlement boundary in such a manner and considers that this could lead to development being brought forward at North East Thattham which is far in excess of the number of dwellings envisaged to be allocated at the site. That is indeed, if the site does deliver.</p> <p><u>North East Thattham – Deliverability</u></p>

Policy SP17 outlines the expectation that all 1,500 dwellings proposed to be allocated at North East Thatcham will be delivered within the plan period.

The Council's Housing Trajectory (within the Housing Background Paper) illustrates that North East Thatcham is not expected to start yielding housing completions within the first five years of the plan period. As such, it can be concluded not to be a 'deliverable' site in accordance with the definition in national policy.

Assuming that it is capable of being considered a 'developable' site, it is instead slated to deliver 150 units from a standing start in 2029/30 (i.e. Year 8 of the LPR) and then in every subsequent year until 2038/39 (i.e. Year 17).

Croudace considers it unrealistic for the site to deliver 150 units in its first year given significant preliminary and enabling works will be required to install key infrastructure, before construction of houses can begin. Whilst there is no indication as to how 150 units a year will be delivered (e.g. through multiple sales outlets etc.), Croudace considers that the trajectory should be redrafted to show more realistic delivery rates, together with lead-in times for supporting items of key infrastructure.

Large strategic sites, including those allocated by the Council's Core Strategy at Sandford Park, can often take much longer to begin delivering dwellings and subsequently thereafter due to complex infrastructure requirements and delays with land assembly.

The Lichfields document 'From Start to Finish' (February 2020) suggests at figure 4 that for sites of 2,000+ dwellings, the average timeframe from validation of first outline planning application to completions on site is 8.4 years. After that, the average build out rate for a greenfield site of 2,000+ dwellings is 181 dpa.

Therefore, to achieve the delivery of 1,500 dwellings as assumed within the plan period, an outline planning application would have needed to be submitted in Spring 2022, allowing first completions in 2029/30. Clearly, an outline planning application has not been submitted at North East Thatcham and the trajectory set out by the Council is unlikely to be achievable. As such, the Council should take a precautionary approach and make provision for smaller scale allocations such as at Henwick Park.

For example, according to the 5YHLS Statement (November 2022), Sandford Park has failed to deliver any completions since it was allocated by the Core Strategy in 2012. Sandford Park East was granted outline planning permission on appeal in May 2022 but no reserved matters application has yet been submitted, while Sandford Park West is subject to a longstanding outline planning application which remains undetermined since submission in 2018. The Council has correctly not counted any units arising from Sandford Park West in its 5YHLS up to 2028.

In common with the Sandford Park site, draft Policy SP17 requires a 'comprehensive' form of development (i.e. a single planning application) to ensure that the "provision of all infrastructure, services, open space and facilities will be timely and co-ordinated". Given that requirement and for a scheme of this size, the Council may require a Supplementary Planning Document to guide development, thus adding further scope for delays to delivery whilst such a document is drafted.

Given the delays experienced with the comparable allocation at Sandford Park, Croudace is concerned that the Council relies on two strategic sites to deliver a combined 70% of the LPR's total allocations (and one large strategic site to deliver 80% of the LPR's new allocations). Likewise, the two large strategic sites make up a combined 32% of the Council's claimed supply across the plan period. Croudace does not believe that this represents a 'justified' or 'effective' strategy. To the contrary, it is a high-risk strategy.

Croudace considers that the delivery issues at Sandford Park clearly demonstrates the types of challenges that can be faced with delivering housing on such a large scale. This should respectfully serve as a warning to the Council that a variety of allocations are required for flexibility across the plan period.

The inability of North East Thatcham to yield housing completions within the first seven years of the plan period has the potential to lead to a shortfall in housing land supply for the Council, soon after plan adoption. Clearly therefore, the LPR should be allocating a range of additional smaller sites to provide greater flexibility and certainty. NPPF paragraph 68 is clear that planning policies should identify a sufficient supply and mix of sites and that authorities should identify a supply of specific, deliverable sites for years one to five of the plan period.

Paragraph 73 of the NPPF refers to the potential benefits of larger scale development but requires authorities to make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites.

If allocated for development, the Land at Henwick Park is a deliverable site which could deliver dwellings within the first five years of the plan period, as we demonstrate earlier within these representations.

North East Thatcham – Affordable Housing

Draft Policy SP17 expects North East Thatcham to deliver 40% affordable housing, potentially equating to 600 units as part of its comprehensive development. However, given it is unlikely to deliver housing until Year 8 of the plan period (i.e. 2029/30), this will also result in a delay to the delivery of vital affordable housing.

Thatcham, as a result of its period of 'consolidation', has suffered from a lack of affordable housing in recent years and would therefore benefit from a meaningful delivery of affordable housing early in the plan period.

The site at Henwick Park would deliver at least a policy compliant level of affordable housing (40%) and as set out above, Croudace anticipates that a significant proportion of affordable units could be delivered within the first five years of the plan.

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

No

* Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>A reduction in the reliance on the large strategic site at North East Thatcham– large strategic sites such as that proposed at North East Thatcham can take many years to begin delivering housing and can often run into difficulties with land assembly and infrastructure requirements. By relying solely on one large strategic site in one of the key growth areas, the Council runs the risk of not delivering housing in an area where it is much needed until much later, or even beyond the plan period. Croudace do not consider this to be a 'justified' or 'effective' strategy.</p> <p>The removal of allocations in areas affected by nutrient neutrality– the LPR proposes new allocations in areas affected by nutrient neutrality, and proposes to carry forward HSA DPD allocations affected by the issue. Croudace does not consider it to be a 'justified' or 'effective' strategy to rely on sites which have uncertain delivery timeframes to deliver housing in areas which need delivery early in the plan period. By opting to allocate such sites, the Council risks restricting the supply of housing and forcing itself into a position where it may not be able to demonstrate a 5YHLS soon after adoption of the LPR.</p> <p>Consideration and allocation of sustainable, reasonable alternative sites – such as Henwick Park, in order to address the above issues.</p> <p>Croudace considers that the LPR fails to meet the legal compliance requirements of the Planning and Compulsory Purchase Act 2004 by not properly considering all reasonable alternatives to meet a variety of challenges faced by the LPR. Henwick Park, for example was dismissed as a strategic site but not even considered as a non-strategic option by the SA/SEA.</p> <p>If the site were properly assessed as a non-strategic option, Croudace is confident that the Council would find Henwick Park's ability to be delivered, crucially in absence of constraints and within the first five years of the plan period, of benefit to its housing land supply position. Furthermore, its allocation would add more choice to the land identified for the delivery of housing and would help to make a meaningful contribution to the delivery of a range of housing in the short-term, which will deliver the much required housing that West Berkshire needs.</p> <p>Croudace strongly urges the Council to reconsider the Regulation 19 LPR before it submits the Plan to the Planning Inspectorate to address the above failures in soundness and legal compliance. If it does not do so, Croudace will respectfully ask the appointed examining Inspector to find the Plan unsound in the absence of such modifications.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rectory Homes Ltd
Consultee Full Name	Steven Kerry
Consultee Organisation	Rectory Homes Ltd
Agent Full Name	
Agent Organisation	

Comment ID	PS758
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:09:00
Attached Files	Rectory Homes REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<i>[For full response see attached document]</i> The policy has removed all previously allocated sites for development within the settlement of Cold Ash, in addition to removing or reducing the number of homes to be delivered at the allocations within Newbury. Given the conveyed concerns regarding the Council's approach to housing delivery, it is clear that

	<p>additional sites will need to be identified for allocation in order to provide a Plan that is positively prepared and sound.</p> <p>There are opportunities within this sub-area to provide a mix of additional large and small site allocations within the settlements of Newbury and Cold Ash to provide a robust strategy on housing deliver. This would also assist demonstrating compliance with Paragraph 69 of the NPPF through additional small site allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thattham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thattham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1721
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thattham
Order	42
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Full approval has been given by West Berkshire Council for 91 dwellings on this site by 18/00964/FULEXT. This has a single access from Lower Way.</p> <p>This approved application does not include cycle linkages through the site, despite a specific request by Thatcham Town Council.</p> <p>The development does not front onto Lower Way, and one property is only around 1m away from the public footpath that now runs through the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>Point (i) in Policy RSA7 (Council note - the site referred to is RSA5 in LPR) needs to be amended as follows:</p> <p>(i) Provision for approximately 85 91 dwellings, with a mix of dwelling sizes and types.</p> <p>(ii) The site should be accessed via Lower Way. To ensure permeability through the site, the scheme should be designed with the potential for two accesses to be provided. Pedestrian and cycle linkages will be expected through the site and linking to the surrounding area.</p>

	<p>(iv) It is expected that development will front onto Lower Way to enable effective integration with the existing built form and be set back from the existing public rights of way to the east and west of the site. (added text is underlined; deleted text is struck through)</p> <p>The consequential change to the number should be made to Policy SP13.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1776
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>LPR paragraph 6.23 identifies a need for an additional 1,809 dwellings to 2039, taking into account existing commitments for 7,337 dwellings. Notably the existing commitments includes 1,580 dwellings at Sandford Park, which was allocated in 2012 and has only recently been granted planning permission, and a large proportion (1,949 dwellings) at windfall sites which do not have planning permission, and so it is questionable whether all of the existing commitments will be delivered during the LPR plan period. It is therefore considered that an additional supply of housing is likely to be required in the LPR, above the stated requirement of 1,809 dwellings, which could be met through smaller sites distributed throughout the District to avoid similar delays to that experienced at Sandford Park. It is important that the LPR identifies a sufficient supply of deliverable sites to meet the local housing target, taking into the previous shortfall in delivery and the potential that identified sites do not come forward as envisaged.</p> <p>It is noted that draft LPR Policies SP13-SP15 make provision for 1,720 new dwellings (as referred to at paragraph 6.24), with 80 dwellings proposed to be allocated at neighbourhood plans (as referred to at</p>

	<p>paragraph 6.25), below the stated outstanding requirement for 1,809 dwellings. It is therefore crucial that additional housing sites are identified in order to meet the LPR housing target (with a need for more housing sites to be identified given the comments raised above regarding the existing commitments).</p> <p>The NPPF also emphasises that small and medium sites 'can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly' (paragraph 68). Indeed the Estate's landholdings across the eastern part of the District include a number of small and medium land parcels (as noted further below) which are suitable to accommodate sustainable development and contribute to the District's housing land supply. This includes the Estate's land at Burghfield Common, Theale and Mortimer as noted further below. A number of these sites are currently located within the DEPZ, however should this change during the plan period (as noted above) and additional housing be required, these sites are well placed to accommodate this need.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	Policy SP13-15 and the supporting text as currently worded do not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, in order to ensure the soundness of the Plan, additional housing sites should be identified to ensure that local housing needs are met. This should include consideration of small and medium sites at Burghfield Common, Theale and Mortimer.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucklebury Parish Council (Represented by Andrew Black Consulting)
Consultee Full Name	Bucklebury Parish Council
Consultee Organisation	Bucklebury Parish Council
Agent Full Name	Andrew Black
Agent Organisation	Andrew Black Consulting
Comment ID	PS1294
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	01/03/2023 21:11:00
Attached Files	Andrew Black Consulting (Bucklebury PC) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep' for full consultation response]</i> Development in the Countryside and the 'Strategic Gap' A Site Selection Background Paper (Reg18 SSBP) was produced for the regulation 18 consultation and curiously has not been published as part of the regulation 19 consultation. Paragraph 8.11 of the reg 18 SSBP states: <i>The master planning work considered all of the HELAA sites promoted in Thatcham, rather than considering all suitable sites within West Berkshire.</i> Such a cavalier approach to trying to make the plan fit is noticeable throughout the proposal but is spelt out quite clearly in the attitude to the Strategic Gap. The Reg18 SSBP set out the following in relation to Site THA9 in Table 8.2:

	<p><i>There are concerns that development may reduce the open countryside between Thatcham and Newbury / Greenham, and introduce built form to south of Lower Way. The site is a buffer to development and forms part of the open character along this side of Lower Way. There is further concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.</i></p> <p>THA9 is for a proposed HELAA development of 36 houses, situated beyond the natural and actual settlement boundary of Lower Way, and which would breach the strategic gap between Thatcham and Newbury.</p> <p>By contrast at the time of regulation 18, THA20 was a proposed development of 2500 houses, which would be situated beyond the natural and actual settlement boundary of Floral Way and the A4, and which would breach the strategic gap between Thatcham and Upper Bucklebury and the AONB. The proposed site is a buffer to development and forms part of the open character along this side of Floral Way and the A4. There is much local concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.</p> <p>If fair selection criteria were applied, then the comments for THA20 would have been consistent with those for the much smaller development of THA9. However, the comments for THA20 stated:</p> <p><i>In contrast there are very few negative impacts that developing the site would have.</i></p> <p>This shows how predisposed and skewed the “analysis” that WBC is undertaking is.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	BPC has wider concerns around the way in which WBC has undertaken the consultation process for the LPR and the Duty to Cooperate in general. Failings with Duty to Cooperate are matters which are not capable of being remedied in advance of the plan being submitted for examination. BPC will set out further details of these failings to the inspector should the plan be submitted to the Planning Inspectorate by WBC.
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence through the submission of matters statements and oral evidence from experts. To provide updated evidence to the examiner. For other relevant experts employed by parish council to give detailed technical views on matters.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hathor Property Limited (Represented by Turley Associates)
<p>Consultee Full Name</p>	Fred Schiff
<p>Consultee Organisation</p>	Hathor Property Limited
<p>Agent Full Name</p>	Mr Simon Packer

Agent Organisation	Turley Associates
Comment ID	PS1652
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	PS1652 Turley (Hathor Property) App 1.pdf PS1652 Turley (Hathor Property) App 2.pdf PS1652 Turley (Hathor Property) App 3.pdf PS1652 Turley (Hathor Property) App 4.pdf PS1652 Turley (Hathor Property) App 5.pdf PS1652 Turley (Hathor Property) App 6.pdf PS1652 Turley (Hathor Property) Full LPR Rep.pdf PS1652 Turley (Hathor Property) App 7.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

development in accordance with the policies of the NPPF.

* Yes

* No

Please give reasons for your answer

[See attachment 'PS1652 Turley (Hathor Property) Full LPR Rep'] for full consultation response]

1. Introduction

1.1 These representations have been prepared by Turley on behalf of Hathor Property in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023) (LPR).

1.2 Our client has land interest to the south of Enborne Street, Newbury, and adjacent to the existing built up area of Newbury.

1.3 We look forward to continuing to engage with the LPR process as it emerges.

1.4 These representations are accompanied by the following plans and reports included in the relevant appendices:

- Site Location Plan [see attachment 'PS1652 Turley (Hathor Property) App 1];
- Landscape Appraisal [see attachment 'PS1652 Turley (Hathor Property) App 2];
- Heritage Appraisal [see attachment 'PS1652 Turley (Hathor Property) App 3];
- Transport Note [see attachment 'PS1652 Turley (Hathor Property) App 4];
- Opportunities and Constraints Plan [see attachments 'PS1652 Turley (Hathor Property) App 5'
- Concept Masterplan 'PS1652 Turley (Hathor Property) App 6'];

2. Land at Enborne Street, Newbury

The site and surroundings

2.1 The site extends to an approximate area of 3.15ha occupying land comprising an agricultural field (see Site Location Plan at Appendix 1). There is an existing vehicular access from Enborne Street with associated gates, fencing and parking, which leads to a track extending north-south on the western side of the site and providing access to a courtyard of agricultural buildings.

2.2 The site lies on the southern edge of West Berkshire District. The A34 connects Newbury to Oxford to the north, and Winchester to the south. The north-eastern edge of the site is a short distance (circa 30m) from the settlement boundary of Newbury, as identified in the adopted Core Strategy [and retained as such in the LPR]

2.3 The site lies approximately 3.5km from Newbury Town Centre. Newbury is the main settlement in the District which has good rail, bus and road connections to Reading, Basingstoke and London. It also includes a mainline railway station, and an extensive range of retail, commercial, education and community facilities.

2.4 There is a local centre at Wash Common approximately 1.5km to the north east that provides a range of facilities and services, including a primary school, convenience store, allotments, recreation ground, library and church.

2.5 There are bus stops located circa 500m away in the residential area of Wash Common. The bus services 2 and 2a serve Newbury town centre, Newbury Railway Station and Newbury College. The service runs hourly between Monday-Friday and on Saturdays. The number 6 service also connects with the town centre and railway station, but extends north of Newbury and provides a more irregular service every few hours Monday-Friday and on Saturdays.

2.6 Enborne Street forms part of the Round Berkshire Cycle Route, a circa 140 mile route broadly around the perimeter of the County.

2.7 The site slopes gently from north to south, toward the River Enborne. Established vegetation runs along all boundaries of the site, containing the site. To the north-east of the site, separated from the field by a boundary defined by vegetation, is open land with some clusters of trees, beyond which is the settlement of Newbury. There are detached properties opposite the site on the north side of Enborne Street.

2.8 To the east of the site there is deciduous woodland. The land to the west of the site is also woodland, with some former agricultural buildings enclosed within. This land also has a vehicular access off Enborne

Street. To the south of the site is agricultural field land, beyond which is a small amount of ribbon-like residential development within Enborne Row, located either side of Washwater road.

2.9 To the north of the site, on the opposite side of Enborne Street, are some detached residential properties off the road set in predominantly agricultural land.

2.10 The site is not covered by any statutory landscape or ecological designation. The site falls within the Impact Risk Zones of two SSSIs – Redhill Wood circa 2.6km west of the site, and Greenham and Cookham SSSI circa 3km east of the site.

2.11 A watercourse runs along the eastern boundary of the site, leading from Enborne Street to a pond close to the southern boundary of the site, however the site lies fully within Flood Zone 1.

2.12 The site is classified as Grade 3b agricultural land, which is moderate quality agricultural land.

2.13 There are no listed buildings within or immediately adjacent to the site. The closest listed buildings to the site is circa 580m south of the site (Mill at Falkland Farm, Grade II Listed). The site does not lie within a Conservation Area.

2.14 A Registered Battlefield (Battle of Newbury 1643) lies on the northern side of Enborne Street, opposite the site, extending north adjacent to the built-up area of Newbury.

2.15 There are no Public Rights of Way within the site. Route number ENBO/9/3 runs from Enborne Street a short distance to the west of the site, through the adjacent woodland to Enborne Row settlement to the south of the site.

2.16 The land is under single ownership and is controlled by Hathor Property who are committed to bringing forward residential development on the site following an allocation through the LPR process.

2.17 New development here on any scale will need to be respectful and responsive to its context, aware of the need to maximise use of development land but protecting the special character of the surroundings. The proposals for the site have been developed in this context.

2.18 There is a Class Q approval for change of use from agricultural to residential on the site to the south east (application reference 21/03177/PACOU, approved 15th February 2022). This consent has been implemented and is due to be completed in May 2023.

2.19 To the south of the Site an application for a solar photovoltaic farm has been submitted to WBC (application reference 22/00101/COMIND). This is currently awaiting determination. There are no other relevant planning applications for the site or its surroundings.

Technical Studies

2.20 A series of technical studies have been undertaken to inform the emerging proposals for the site and support its allocation for residential development. These studies are summarised below.

Landscape and Visual

2.21 A Preliminary Landscape and Visual Appraisal has been prepared by LVIA Ltd (February 2023) and is included at Appendix 2. Ten viewpoints were selected to represent a variety of receptors in the surrounding area, all of which were chosen from publicly accessible vantage points. The Zone of Theoretical Visibility was set 2.5km from the site.

2.22 The Appraisal considers the overall sensitivity of the landscape is considered to be medium. The proposal would be consistent with the current landscape character of the site and its surrounding context. With a successful mitigation strategy, the proposal would further integrate with its setting.

2.23 The construction phase will give rise to temporary, short term impacts. The overall weighted level of landscape effect can be considered moderate (i.e. not a material change).

2.24 The viewpoints demonstrate that the visibility of the site is quite limited. The visual impact and the significance of the impacts of the development on the open countryside have been assessed as potentially major/moderate (i.e. a material change) without mitigation from viewpoint 1 at the proposed site access. Change is very limited in its geographic extent due to the surrounding vegetation, landform and built form. The visual effects are minimal due in most part to mature vegetation between the receptor and the site, the topography in the area and similar setting of the proposed scheme.

2.25 Mitigation measures have been identified that can be embedded into development of the site to further reduce the identified impacts. These comprises:

- Retention and management of the existing boundary vegetation;
- Additional ornamental planting;
- Heights of built form to reflect that of its surroundings;
- Built form set back from boundaries to allow growth of boundary vegetation;
- External lighting to be design in line with best practice to minimise potential for light spill;
- Use of external building materials which minimise potential visual intrusion and follow the local vernacular to aid visual blending.

2.26 With the above mitigation measures, the development will have a moderate visual impact and a minor character impact (i.e. not a material change). It therefore is considered can be satisfactorily integrated into the landscape.

Heritage and Archaeology

2.27 A Heritage and Archaeology Statement has been prepared by Ridgeway Heritage Consultancy (February 2023) and is included at Appendix 3.

2.28 The site is located south of the of the southernmost section of the Registered site of the First Battle of Newbury, of 1643. The setting of the designated battlefield has been greatly compromised by modern development on its eastern side.

2.29 The Site and the designated battlefield display contrasting landscape characters, and a limited spatial and visual relationship, which is represented by a narrow frontage on the northern edge of the Site. Inter-visibility between the Site and a small number of distant Grade II-listed buildings is obstructed by intervening land-forms and vegetation.

2.30 The site has low potential for archaeological finds and features, with the possible exception of objects relating to the 1643 battle.

2.31 The proposed development would result in minimal harm to the setting and significance of the adjacent battlefield site and of any other heritage assets, surmounting to the lower end of less than substantial harm. In accordance with the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraphs of 194, 195, 197 and 202 of the National Planning Policy Framework (NPPF) (Note: these are primarily applicable to determining planning applications but are a useful benchmark) , this less than substantial harm is significant.

2.32 It requires a balancing exercise to be undertaken assessing the extent of any harm against the public benefits delivered by the Proposed Development, as part of the overall planning balance. In this instance the level of harm associated with a future allocation is less significant and would be more than outweighed by the benefits of the proposals in meeting market and affordable housing needs.

Transport

2.33 A Technical Note has been prepared by PEP to consider the sustainability of the site, suitability of vehicular access onto Enborne Street and capacity of the road network to accommodate development, and is included at Appendix 4.

2.34 The site would be accessible by non-car means of travel to the local area and to Newbury town centre (as discussed in paragraph 2.1 – 2.6 above). A suitable access with appropriate visibility splays can be provided off Enborne Street.

2.35 Up to 70 dwellings would produce around one vehicle movement every two minutes, which is a low level of traffic generation and would not affect existing traffic or safety conditions on Enborne Street.

2.36 From a sustainable transport and highways perspective, development of the site for up to 70 dwellings would be acceptable. There would be no severe impact in line with the NPPF (2021).

The Proposed Development

2.37 The technical studies indicate the site could accommodate up to 70 dwellings. An Illustrative Masterplan indicating how the site could be developed is attached at Appendix 6 [*see attachment 'PS1652 Turley (Hathor Property) App 6'*].

2.38 The Illustrative Masterplan has been guided by the following factors:

- Retention of boundary vegetation for visual screening;
- Topography and views into the site;
- Consideration of nearby heritage assets; and

- Achieving safe and suitable access into the site from Enborne Street.

2.39 The accompanying Constraints and Opportunities plan at Appendix 5 [see attachment 'PS1652 Turley (Hathor Property) App 5'] illustrates that there are no overriding constraints within the site boundary. The site comprises an open field with established vegetation boundary. On the south west edge of the field there are agricultural buildings, one of which has Class Q approval for conversion to a dwelling (Use Class C3). This area will be maintained as existing.

2.40 The Illustrative Masterplan illustrates how development of the site has been led by the landscape and heritage considerations, providing areas of green open space, part of which acts as SuDS features, and an equipped play space.

2.41 Development parcels have been given sufficient buffers to boundary vegetation on all sides. A set back from Enborne Street is provided, in response to heritage comments. A 5m planting buffer is proposed between the development parcel and the road.

2.42 A new vehicular access is proposed from Enborne Street. A main street with several secondary streets will serve the development parcels.

2.43 Pedestrian links can be provided connecting the existing PRoW from the west of the site (ref. ENBO/9/3), to continue through the site, with potential to connect to the north east toward Wash Common. A new 1.8m footpath is proposed at the northern side of the proposed access, to run along the eastern side of Enborne Street to connect to the existing footway at The Grange junction. This would connect the site to the existing footpath network.

2.44 On-site provision of equipped play space can be accommodated within the site, alongside a policy compliant level of public open space. SuDS features can also be located on-site.

2.45 The framework has been drafted according to the following assumptions:

- The proposed housing mix will respond to local housing need and include a range of 2, 3 and 4 bedroom homes and include provision of policy compliant level of affordable housing.
- Housing will be 2 storey with potential for 2 ½ storey in key locations.
- Detail with regards to materials, planting etc. will be dealt with at the application stages of the planning process, although design detail will seek to reflect the locality.
- Priority will be given to ensuring a bio-diversity net gain of at least 10%

2.46 We consider that the development of the site would secure the following benefits:

- **Housing Need** - the site is capable of delivering up to 70 high quality homes,. This will assist in the delivery of new market and affordable housing that is capable of addressing local need in terms of type and tenure. The site can be brought forward for development quickly and is capable of making an important contribution towards the immediate housing needs of the District during the early years of the LPR period.
- **Housing Mix and Choice** – the site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community.
- **Open Space** - any new residential development will provide a strong landscape framework comprising new open space provision for formal and informal play and recreation providing opportunities embedded within green infrastructure.
- **Promoting Healthy Communities** - the site is in an ideal location for residential development, immediately adjacent to the most sustainable settlement in the District and in close proximity to existing retail, education and community facilities and services within Wash Common. These facilities are accessible by foot, and beyond this Newbury Town Centre and railway station are accessible via cycling or public transport. The railway station provides access to key locations such as Reading, Basingstoke and London.
- **Economy** – the proposed development will provide a boost to the local economy during construction and subsequent occupation.

Sustainability Appraisal

3.23 Table 11 of the Sustainability Appraisal / Strategic Environmental Assessment considers the merits of different strategic options for delivering the necessary growth to meet development needs during the LPR period.

3.24 There is little evidence to justify why the particular options have been selected. Having identified that Newbury offers the greatest potential for sustainable development, there is a specific option that focusses development on Newbury. It is concluded that:

“This option gives a number of potentially positive sustainability effects in relation to focusing development on the biggest town with the largest number of facilities, with a significantly positive effect predicted due to the strategies’ focus on the use of brownfield and. However, there are is an unknown impact as to whether the strategy would be able deliver adequate housing to meet the local identified need due to

the lack of suitable sites within the area." A reliance on focusing development in Newbury may not deliver the number of dwellings required to meet the local need."

3.25 The conclusion is that:

"Further largescale development opportunities are more limited, although there are opportunities for redevelopment within the settlement boundary and on brownfield sites."

3.26 Appendix 4 [see attachment 'PS1652 Turley (Hathor Property) App 7] provides a more detailed scoring assessment of this option and a useful comparison with the option focussing on strategic growth in Thatcham (the 'preferred option'). Whilst it is recognised that strategic growth in Thatcham does offer the potential to secure related infrastructure, facilities and services alongside residential development, a suitable balance does need to be made with the greater level of existing facilities and services, and opportunities to use alternatives to the private car, that exist both within the settlement but also around Newbury.

3.27 It is unreasonable to score this option less positively than the preferred option of strategic growth at Thatcham when, for example, opportunities for reducing impacts on climate change or deliver development in sustainable locations are more likely to be positive in the short term. Scoring this option negatively on the basis of a 'limited number of smaller site options' is not appropriate.

3.28 In addition, if confirmed, the strategic allocation will inevitably take some time to deliver housing, as evidenced by the large timescales associated with the allocation at Sandleford Park. It is highly unlikely that any delivery will come forward within the first five years of the LPR period, and potentially significantly longer.

3.29 To this effect, an alternative option that explored a focus on both Newbury and Thatcham, with reduced growth in the AONB villages and Eastern Area, may well have been more appropriate. This would have provided a better balance in delivering sustainable development throughout the LPR period.

5. Summary and Conclusions

5.1 These representations have been prepared by Turley on behalf of Hathor Property in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023).

5.5. Newbury is the largest settlement in the District and is able to support residential growth to provide the housing needs in a sustainable location. The strategy set out in the LPR gives insufficient weight to the ability to meet key sustainability objectives from greenfield sites adjacent to Newbury.

5.6 Land at Enborne Street, Newbury is a sustainable and deliverable site under single ownership. The accompanying Transport note, Heritage Assessment and Landscape and Visual Assessments confirm that the proposals can be accommodated without adverse impact on highway safety, and will have no adverse effect on heritage assets or the wider landscape. There are no other identified technical barriers to development of the site.

5.7 The Illustrative Masterplan demonstrates how proposals could be provided on site to further minimise these impacts and deliver a well-designed scheme that retains boundary hedging and woodland and provides suitable open space, equipped play space, and connectivity with the surrounding rights of way and footways along Enborne Street to connect to Wash Common/Newbury. It would provide a logical extension to the existing settlement.

5.8 It is considered Land at Enborne Street, Newbury should be considered as a residential site allocation to support housing delivery in the District.

5.9 Hathor Property look forward to working with the Council throughout the LPR process.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1320
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	White Peak (Bloor Homes) Annex 2.pdf White Peak (Bloor Homes) Gorese Covert.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Omission Site: Gorse Covert</p> <p>Object. The policy is not justified or consistent with national policy.</p> <p>The Sandleford Park allocation has been carried forward from the Core Strategy, Policy CR3 Sandleford Park. It was intended to deliver up to 2,000 homes. Site constraints and the importance of delivering a significant level of green infrastructure have reduced its capacity to around 1,500 units.</p> <p>The draft plan, through policies SP1 Spatial Strategy and SP3 Settlement Hierarchy, continues to place importance on focusing housing development in Newbury, identifying that an urban extension on greenfield land at Sandleford Park will form a new residential neighbourhood. The Sustainability Appraisal/Strategic Environmental Assessment reinforces this approach. It did, however, consider four options for Sandleford Park (Table 28, page 36). It did not consider an additional option to include Land South of Gorse Covert. Land South of Gorse Covert (plan attached) presents an opportunity to support the plan strategy of focusing new residential development in Newbury and ensure that the optimum number of dwellings is proposed in this sustainable location [Sandleford Park].</p> <p>Land South of Gorse Covert is available, suitable and deliverable within the plan period. The site has capacity to deliver up to circa 200 housing units. It is adjacent to, and immediately to the south of, the Sandleford Park Strategic Allocation set out in Policy SP16. Consequently, it abounds the land the subject of an outline planning permission for up to 1,000 homes, Land at Sandleford Park (Ref 20/01238/OUTMAJ), the larger of the two Sandleford Park sites. Bloor Homes is the developer for both Land South of Gorse Covert and Land at Sandleford Park.</p> <p>The site is in a sustainable location for development, being in Newbury and adjacent to an allocated site. There are no site constraints which prevent it from being developed</p> <p>Land South of Gorse Covert was assessed in the HELAA Update 2023 with reference GRE2. The capacity was incorrectly estimated as 150 units instead of up to circa 200 units. Contrary to information in the HELAA, it is now being promoted by a developer. The site is identified as being bordered by ancient woodland to the north but this is an area of commercial woodland and is not subject to an ancient woodland designation. There is scope to provide access to the site through this wooded area. Woodland to the south is at some distance from the site boundary. Overall, the site appears to have been excluded from further consideration due concerns over landscape character.</p> <p>The accompanying note Annexe 2. Land South of Sandleford Park, Newbury (HELAA Site Reference GRE2) Preliminary Landscape Review sets out an assessment by the developer's landscape architects SLR. This concludes that 'development of the site would not have a detrimental effect on the "settlement form, pattern and character of the landscape.'" The review was based on consideration of relevant policy documents and a desktop-based study of the existing landscape pattern within the site and its immediate vicinity.</p> <p>The review reaches this conclusion (paragraph 6.2) 'due to the site's location within the landscape, and the strong existing boundaries associated with the current and future1 landscape and visual baseline. The setting of, and views from, Grade 2 listed Sandleford Priory would also be preserved. The proposed settlement form and pattern within the site would be aligned with the proposed development pattern</p>

	<p>within the allocated Sandford Park8 development north of Gorse Covert. It would respect and strengthen existing boundary elements – reinforce existing hedgerows to the east and west and provide appropriate buffers from the woodland edges to the north and south. This would help to integrate the site and associated development within its landscape context, thereby ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.'</p> <p>The site is being promoted by the developer for Land at Sandford Park, which offers maximum potential to integrate the site into the existing allocation. The site would benefit from the new services and infrastructure coming forward as part of Sandford Park, representing a highly sustainable extension to a long standing commitment in the Local Plan.</p> <p>As currently proposed, SP13 does not present an appropriate strategy in that it has not fully taken account of all reasonable alternatives i.e an option to increase the size of the Sandford Park Strategic Allocation. It also fails to include a parcel of land which would contribute towards the delivery of sustainable development, contrary to the intentions of the NPPF (2021)</p> <p>Attachment: annex 2 and Gorse Covert Location Plan</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Proposed amendment: to increase the Sandford Park Strategic Allocation capacity to <u>approximately 1750 dwellings</u>.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Yes. To fully explore the potential for the site's inclusion in the Plan to ensure the Plan is sound.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)</p>
<p>Consultee Full Name</p>	<p>Lochailort Newbury Limited</p>
<p>Consultee Organisation</p>	<p>Lochailort Newbury Limited</p>
<p>Agent Full Name</p>	<p>Sarah Ballantyne-Way</p>
<p>Agent Organisation</p>	<p>Lochailort Investments Ltd</p>
<p>Comment ID</p>	<p>PS1395</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 13</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Sites allocated for residential and mixed-use development in Newbury and Thatcham</p>
<p>Order</p>	<p>42</p>

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	Kennet Centre Appendix 1.pdf Kennet Centre Appendix 1.pdf Emerging Draft Policy RSA1.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>As the owner of the Kennet Centre in Newbury, we set out in this letter our representations on those policies in the Proposed Submission Local Plan that are relevant to this key regeneration site in Newbury's town centre.</p> <p>An application for the redevelopment of the site was refused in November 2022 for: "Full planning permission for the phased redevelopment of the Kennet Centre comprising the partial demolition of the existing building on site and the development of new residential dwellings (Use Class C3) and residents' ancillary facilities; commercial, business and service floorspace including office (Class E (a, b, c, d, e, f, and g)); access, parking and cycle parking; landscaping and open space; sustainable energy installations; and associated works."</p>

It is however the intention of Lochailort Newbury Ltd to continue to pursue the redevelopment of this site and the below representations are made in this regard.

The site is located in the centre of Newbury and currently forms one of two purpose-built shopping centres in the town. The existing shopping centre has suffered a gradual but sustained period of decline as a result of the redevelopment and newer retail centres in the town, and edge of town, changes in the pattern of retail including online shopping and more recently the COVID-19 pandemic. The Kennet Centre is now a failed and out of date shopping centre in need of significant investment and repurposing.

The regeneration benefits of redeveloping the site as a mixed use scheme incorporating residential, commercial and retail will result in significant economic, environmental and social benefits for Newbury and these are detailed in Appendix 1.

Site Allocation

The Regulation 18 included draft Policy RSA 1 which allocated the Kennet Centre for a mixed use development and acknowledged its highly sustainable location, with the intention to draft further detailed policy criteria. The draft policy is set out below:

[See attached Emerging Draft Policy RSA1 and Appendix 1]

Lochailort Newbury Ltd wrote to the Council in response the Regulation 18 in their letter of 5th February 2021 as follows and, while the policy is no longer included in the Proposed Submission Local Plan, the below comments still stand:

*We **support** the identification of the Kennet Centre as a site in need of regeneration.*

*We **support** the explicit recognition that this is a highly sustainable location. We also support the flexible wording of the policy in referring to a mix of uses rather than setting out any use mix requirement or restriction.*

*However, we also request the following **policy changes** to align the emerging site-specific allocation with our comprehensive redevelopment masterplan that has already been subject to extensive consultation:*

It is within the context of the above background that we make the following representations.

1. Quantum of residential development

*The iterative masterplanning process that we have undertaken over the past months has confirmed that, as part of a mix of uses, this highly-sustainable location could accommodate **a minimum of 400 dwellings**. The reference to “approximately 250 dwellings” in the draft policy should be increased to “approximately 400 dwellings, or approximately 500 dwellings should C2 uses form part of the redevelopment.”*

2. Existing uses

It would be difficult to extend or redevelop the Kennet Centre in its current form from an engineering and energy performance perspective and to that end, whilst we intend to retain the existing multi-storey car park and the 2009-built cinema wing, the rest of the centre (built in phases from the 1970s onwards) will be demolished in its entirety. The policy wording should be amended to read “The residential aspect would complement any retained and/or additional non-residential uses on the site.”

3. Development density

The Kennet Centre occupies a significant parcel of land in West Berkshire’s largest town centre. It benefits from excellent sustainable transport links by virtue of its location mid-way between the railway station and bus station. It has a level of accessibility to services, facilities and employment opportunities that no other brownfield site in the District can equal. Its comprehensive redevelopment offers an unparalleled opportunity to revitalise and regenerate this part of the town centre. Consequently, the site’s unique sustainability credentials, together with its scale, mean that redevelopment here should be maximised to make the most efficient use of the site and thus minimise the quantum of development needed on greenfield land elsewhere. The opportunity for sustainable energy installations is also maximised with higher density schemes. This means that an appropriate development density should be informed by proper master planning and contextual analysis, rather than being led or constrained by the more generalised approach adopted in the West Berkshire Density Pattern Book. Accordingly, the policy wording should be amended to read “The site occupies a highly sustainable location and presents an opportunity for a substantially higher density than estimated using the West Berkshire Density Pattern Book.”

4. Appraisal criteria

We acknowledge the site’s location within the Conservation Area, where the test is whether a development preserves or enhances the area’s character and appearance. We would expect the appraisal criteria to be defined to align with the statutory test.

It is acknowledged that WBC does not consider it necessary to allocate sites within development boundaries as the principle of development is established as set out in paragraph 6.26 of the Submission Draft Local Plan. However, we consider that the Kennet Centre site allocation should be reinstated to acknowledge the importance of this site to Newbury in terms of town centre uses, significant residential development, highly sustainable location and regeneration.

There is exceptionally strong policy support for the principle of the comprehensive redevelopment within the *National Planning Policy Framework*, *Planning Practice Guidance*, and the numerous ministerial and Prime Ministerial announcements and speeches on the importance of revitalising our town centres. It is notable that the Newbury BID formally support the redevelopment. A site allocation would acknowledge the significant challenges the existing Kennet Centre faces and the considerable benefits its redevelopment would bring to Newbury. It would also assist in the delivery of this important site.

Attached:

- Reg 18 Kennet Centre Policy
- Appendix 1 - Benefits of the Kennet Centre Scheme

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kiff, David
Consultee Full Name	Mr David Kiff
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1596
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	09/03/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*Late Response*</p> <p>RSA1/HSA1 Land North of Newbury College – Monks Lane</p> <p>This development by Feltham Properties of 15 houses adjacent to Sandford Park will place even more pressure on local services and infrastructure, particularly the Newbury College – Monks Lane road junction. What mitigation measures is the developer required to implement</p> <p>Land East of Newbury College adjacent to the A339</p> <p>No mention is made in the Local Plan Review of the Development proposed by Aldi and Feltham Properties for a Superstore, housing and a residential home in the land East of Newbury College in close proximity to Sandford Park. In addition to the RSA/HSA1 development noted above this would create unacceptable pressure on the local infrastructure and the Monks Lane – A339 junction. Is this being considered within the Local Plan Review?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington Valley Group (Represented by Barton Willmore now Stantec)
Consultee Full Name	Paul Michael
Consultee Organisation	Donnington Valley Group
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1351
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	Barton Willmore (DVGC) Site boundary.pdf Donnington Valley GC LVA Part 1.pdf Donnington Valley GC LVA Part 2.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Omission Site - Donnington Valley Golf Course</p> <p>We note that the settlement boundary review has been undertaken since the Regulation 18 consultation took place. The Settlement Boundary Review (SBR) (December 2022) includes the proposed new settlement boundary for Donnington, which we note does not significantly differ from the current settlement boundary.</p> <p>In limiting the ambition of the settlement boundary review, the Council has overlooked the opportunity to consider potential for development on well-located sites in close proximity to existing settlements.</p> <p>Within our representations to the Regulation 18 Consultation, we commented that we disagree with the Council's approach of relying on larger sites and ruling out sites within smaller settlements and only allocating sites which fall within the service villages, rural service villages or urban areas. The Regulation 19 Draft Local Plan follows suit in its approach to allocating sites for housing development, as evidenced by the allocated sites Sandleford Park (1,500 dwellings) and North-East Thatcham (1,500 dwellings). As such, we maintain that the Council should seek to accommodate further growth across the district. The Council's approach, in our view, is not consistent with the NPPF.</p> <p>The Landscape and Visual Appraisal Note which accompanies these representations shows that our client's site at Donnington Valley Golf Course could accommodate housing development which would assist the Council in reducing reliance on larger sites. Whilst the principles of delivering large sites with accompanying infrastructure is supported by national planning policy, and we do not object to these allocations, we raise concern that the numbers suggested may not be delivered within the plan period. In particular, large allocations require substantial infrastructure to be delivered prior to any housing delivery. Increased small and medium scale sites would complement the larger sites by ensuring a constant stream of delivery whilst larger sites start to mobilise. A modest area of development (50-100 dwellings) at Donnington Valley Golf Course would provide a suitable additional allocation to be delivered in the short term and compliment the longer-term allocations.</p> <p>At paragraph 79, the NPPF states:</p> <p>"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."</p> <p>The Council's approach to rule out sites which are outside of the settlement hierarchy (at stage 3 of the site selection process), without considering the site-specific benefits of such sites, is inconsistent with the above paragraph of national planning policy. The approach also overlooks the circumstances relevant to settlements such as Donnington which, whilst below the Council's settlement hierarchy, has a close functional relationship to Newbury and, therefore, benefits from the services and facilities in Newbury which are readily accessible.</p> <p>Attachments: Donnington site boundary and Donnington Valley Golf Course LVA Note</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	Yes

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincent Lane (Represented by TOWN)
Consultee Full Name	Pincent Lane
Consultee Organisation	Pincent Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1357
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincent Lane) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Location and type of sites allocated in the WBC LPR for Newbury and Thatcham</p> <p>The WBC LPR proposes a range of 8,721 to 9,146 net additional homes during the period to 2039. Of these, some 3,000 units or around one-third of total homes are proposed for just two strategic sites; Sandford Park, Newbury and North East Thatcham. Each site has a proposed allocation of 1,500 units during the plan period. Given that part of the North East Thatcham allocation lies in area of flood risk and the full extent of the development site has not been shown to comply with the Sequential Test we object to the figure of 1500 for this site.</p> <p>The strategy of a full third of the homes proposed in West Berkshire being provided from only two of the sites cannot be said to be justified or consistent with National Policy. The NPPF (paragraphs 68-68) underlines the need for a mix of sites to meet the needs of the area.</p> <p>Adding all the provision set out in Policy SP13 totals 3,459 dwellings to be provided in Newbury and Thatcham. Even ignoring the fact that some of the unallocated and windfall sites will be provided from Newbury and Thatcham, this equates to some 47% of total housing numbers. Such a spatially imbalanced strategy flies in the face of the guidance set out in the NPPF and questions the soundness of the plan.</p> <p>There is a plethora of studies concerning the delivery of large-scale strategic sites nationally in respect of market factors and constraints including the provision of infrastructure (footnote 3). The implications of these studies for the strategic sites is discussed in the representations to policies SP16 and SP17 below but the general conclusion is that the numbers allocated in the current plan period are over-optimistic and the delivery trajectory for both sites should be flatter. As such, they fail to meet the test set out in paragraph 73 d) of the NPPF, whereby strategic policy-making should "make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites..." They are also less likely to deliver their full potential during the plan period.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Colthrop Village Consortium (Represented by Cunnane Town Planning LLP)
Consultee Full Name	Colthrop Village Consortium
Consultee Organisation	Colthrop Village Consortium
Agent Full Name	Joe Cunnane
Agent Organisation	Cunnane Town Planning LLP
Comment ID	PS1394
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:58:00
Attached Files	PS1394 Cunnane (Colthrop Village) Access Strategy.pdf PS1394 Cunnane (Colthrop Village) Bridge Budget.pdf PS1394 Cunnane (Colthrop Village) Bridge Photo.pdf PS1394 Cunnane (Colthrop Village) Bridge Plans.pdf PS1394 Cunnane (Colthrop Village) Council Agenda.pdf PS1394 Cunnane (Colthrop Village) Council Agenda2.pdf PS1394 Cunnane (Colthrop Village) Council Motion.pdf PS1394 Cunnane (Colthrop Village) Education Review.pdf PS1394 Cunnane (Colthrop Village) Flood Mitigation.pdf PS1394 Cunnane (Colthrop Village) Full Rep.pdf PS1394 Cunnane (Colthrop Village) Ground assessment.pdf PS1394 Cunnane (Colthrop Village) GWR letter.pdf PS1394 Cunnane (Colthrop Village) Heritage DBA.pdf PS1394 Cunnane (Colthrop Village) Heritage Statement.pdf PS1394 Cunnane (Colthrop Village) NR letter.pdf PS1394 Cunnane (Colthrop Village) Site Appraisal.pdf PS1394 Cunnane (Colthrop Village) Surface Water.pdf PS1394 Cunnane (Colthrop Village) Transport Note.pdf PS1394 Cunnane (Colthrop Village) Transport.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Omission site - Colthrop Village</p> <p>Details relating to the promotion of Colthrop Village as an alternative allocation included as attachments:</p> <ul style="list-style-type: none"> • Full rep • Preliminary Site Appraisal • Education Capacity and Needs Review • Preliminary Ground Condition Assessment • Drainage <ul style="list-style-type: none"> • Surface Water Concept Report • Colthrop Village Flood Mitigation • Ecology reports (confidential due to inclusion of potentially sensitive information) • Heritage <ul style="list-style-type: none"> • Desk Based Assessment • Heritage Statement • Letters of Support <ul style="list-style-type: none"> • Network Rail • Thatcham Bridge • Transport <ul style="list-style-type: none"> • Proposed Bridge Photo • Access Strategy and Bridge Proposals • Transport Note • Transport

	<ul style="list-style-type: none"> • Bridge Construction Budget estimate • Bridge Plan
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	We propose the deletion of the SP17 allocation and the allocation of Colthrop Village as a more sustainable alternative. See attached Reg 19 submission document.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	In order to present the Colthrop Village effectively to the Examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1419
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Allocation SP17 (NE Thatcham) is not appropriate Please see comments on policy SP17 <see ID: PS1426> <i>para 6.28</i> Text regarding the strategic site at NE Thatcham is not appropriate. The sentence "Strategic development in Thatcham will bring considerable benefits to the town... provision of new schools, community facilities and recreational provision." Is not accurate as the proposed benefits would only benefit the proposed new housing, not the existing town. <i>Para 6.29</i> The sentences "There is significant potential on previously developed land within settlement boundaries, particularly in Newbury town centre and periphery" and "sites within settlement boundaries are not being allocated" are self-contradictory. The latter means that the LPR is allocating far more housing on greenfield sites than is necessary.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Allocation should be significantly reduced or removed - please see my comments on Policy SP17 <i>para 6.28</i> The sentence regarding benefits should be removed.</p>

	para 6.29 The sentence “sites within settlement boundaries are not being allocated” should be removed and sites on previously developed land within settlements should be allocated where appropriate. Housing allocations on greenfield sites should be reduced or removed accordingly.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To explain to the inspector why the allocation is not appropriate To explain to the inspector why sites within settlement boundaries should be allocated
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1261
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As reasoned in our SP12 response (<i>ID: PS1260</i>), we do not think there is a need in the Thatcham part of this Spatial Area for a greenfield site larger than 5-700 homes. There are windfall sites there within or on the edge of the settlement area that could take that number, so an allocation of 500 for a single site in the general area of North East Thatcham is all that is justified. More work will be needed while the Plan making process is paused to establish more precisely where this should be.</p> <p>We also think that there remain significant issues with the Sandlesford site allocated in 2012. We see little prospect of more than 50 new dwellings being occupied south of Monks Lane Newbury until Thames Water upgrades the foul sewer network through Newbury and on to Lower Way Thatcham treatment works, which is likely to take at least five years according to its own estimates. More detail of our reasoning for a reduced number over the Plan period is in our response to SP16.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>In the table for Large sites, SP16 should be reduced to 1200 and for SP17 to 500.</p> <p>In 6.28, delete all after "1500 homes could be developed" in line 3 in that sentence and add", of which only 1200 are likely to be delivered by 2039." In the fourth line replace 1,500 with 500. The remainder of this paragraph can stay as it is.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	We wish to explain our whole approach to new housing in these urban areas.

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1299
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:28:00
Attached Files	Opus Works (NCGC & Chartfield) Full LPR Rep
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	Yes

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p><i>[See attachment 'Opus Works (NCGC & Chartfield) Full LPR Rep']</i></p> <p>We have reviewed the Local Plan Review (LPR) and we wish to submit a number of representations in response to policies and proposals, which impact upon the development plans of Newbury and Crookham Golf Club (NCGC), particularly in light of ongoing determination of the plans for redevelopment of the existing clubhouse (ref: 22/01400/FUL), which is proposed to be financially enabled via a residential development of 31 units (ref: 22/01448/FULEXT).</p> <p>In the paragraphs below, we will identify the relevant policies and proposals before commenting on them either in support, or in the form of an objection, which we trust West Berkshire Council (the Council) as Local Planning Authority (LPA) will give careful consideration, before the submission draft of the Local Plan Review is published and submitted for examination.</p> <p>Policy SP1 - Spatial Strategy</p> <p>This policy states that the overall approach to development will be based on three spatial areas:</p> <ul style="list-style-type: none"> • Newbury and Thatcham • Eastern Area • North Wessex Downs AONB <p>Newbury is identified as a focus for housing development. NCGC is located on the south- eastern edge of Newbury. Therefore, in accordance with policy SP1, it is a suitable and sustainable location for housing development.</p> <p>Policy SP3 - Settlement Hierarchy</p> <p>This policy states that development in West Berkshire will comply with the spatial strategy set out in policy SP1. Development will be focused on the most sustainable settlements. The Urban Areas (including Newbury) will be the prime focus for housing and economic development, offering development potential through: regeneration of built-up areas; allocated sites in the LPR and Neighbourhood Plans; retention of settlement identity and necessary supporting infrastructure.</p> <p>In this case, we consider that land at NCGC is suitable for allocation as a residential site in the LPR, as it lies on the edge of the settlement of Newbury and is adjacent to an existing bus stop on an established bus route (Number 2 and 8 services).</p> <p>Policy SP7 - Design Principles</p> <p>This policy states that new development will strengthen a sense of place through high quality locally distinctive design and place shaping. It will make places better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.</p>

NCGC consists of 50 hectares (123 acres) of undulating land immediately to the east of the built-up area of Newbury, as delineated by Pigeons Farm Road. NCGC contains considerable areas of woodland and green infrastructure. A modest housing development of c.31 units on 2 hectares (5 acres) of land at the western edge of NCGC, which sits on relatively flat land, offers opportunity to make good use of this under-utilised space which does not form part of the playing area associated with golf course, to create a verdant and attractive "landscape-led" scheme. Enabling the retention of NCGC through delivery of a much-needed replacement clubhouse and will in turn conserve and enhance the existing landscape character and historic context of the site, which is the seventh oldest golf club in England, as well as its wider surroundings. The location on the edge of the countryside, adjacent to existing rights of way and overlooking land in leisure use will offer unique opportunities to improve access to the countryside and leisure facilities for new residents and existing ones. The health and well-being benefits of the proposal for the local population will be significant.

Policy SP8 - Landscape Character

This policy states that landscape-led development which conserves and enhances the biodiversity and local distinctiveness of the landscape character of the district will be supported. With regard to development proposals, particular regard will be given to: valued features and qualities; sensitivity and capacity of area to change and ensuring that new development is appropriate in terms of location, scale and design to the context of the existing settlement form, pattern and character.

The proposed residential site does not lie in a sensitive landscape location. The site is remote from the AONB to the north, while closer to the north-west is the racecourse and to the south is the former Greenham Common Air Base. As part of the residential application process, a LVIA has been undertaken which has demonstrated that the new buildings will not have a harmful impact on the existing settlement form, pattern and character. Appropriate landscape mitigation is also proposed, including native planting and significant biodiversity enhancement measures. The 50-hectare land holding

contains substantial areas of woodland, which helps to screen the residential site from long-distance views and the proposed residential development will therefore make little significant impact to the landscape setting of the settlement or the surrounding area; development may arguably improve the setting.

Furthermore, the proposed demolition and replacement of the clubhouse, which will be funded by the proposed housing development, is proposed as a wholly single-storey building, on previously developed land, which is subject to landscape planting to ensure that it blends into the landscape and does not lead to any harm arising either to the site or its surroundings, as demonstrated by the submissions made in support of the planning application. The new homes and clubhouse will provide significant economic, environmental and social benefits for the local community, whilst not harming the landscape character of the area and its surroundings.

Policy SP10 - Green Infrastructure

This policy states that the council will maximise the potential for strengthening both local and strategic Green Infrastructure (GI) across the district. Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment and the health and wellbeing of the community.

NCGC is a land holding of 50 hectares (123 acres). Only 2 hectares (5 acres) are proposed for residential development in the south-west extremity of the land holding. There is considerable scope available to use parts of the remaining 48 hectares of land to plant new trees and other GI to enhance and protect the verdant character and appearance of the local area on the south-eastern edge of the settlement and this is demonstrated in the landscape proposals and the Biodiversity Net Gain report submitted in support of the proposals.

Allocation of land at NCGC will ensure that significant GI improvements will be provided as part of a landscape-led scheme. The availability of so much land in the same ownership and adjoining the proposed development will offer opportunities to make a net gain in GI, which will be to the benefit of the local community. Given the location of the GI on NCGC, which is managed by a team of green keepers, who are highly qualified in arboreal and ecological care, it will be possible to ensure that any new planting is maintained and properly managed over the long-term which will ensure that the GI improvements are there to be enjoyed by the local community for many decades to come.

Policy SP11 - Biodiversity and Geodiversity

This policy states that development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver net gain. Development proposals across the district will be expected to deliver 10% net gain for biodiversity either within the site boundary or as off-site compensation where appropriate.

On a land holding of 50 hectares, with only 2 acres proposed for residential development, there will be considerable scope for the provision of biodiversity net gain. This will be available not only for the 2 acres of residential development proposed by NCGC, but it could potentially be available for other smaller residential sites to utilise. To support the planning application package, a Biodiversity Net Gain assessment has been undertaken to establish the means to achieve a 10% on-site net gain. This has ensured that the proposal will make a positive contribution to bio and geodiversity in the local area to the benefit of the local community, both in visual and well-being terms. Such improvements, if consented, will ensure that NCGC contributes positively the bio and geodiversity of the locality for many decades to come.

Policy SP13 - Sites allocated for residential and mixed-use development in Newbury and Thatcham

The policy lists a number of sites of varying sizes, which are proposed to be allocated for residential development. It is recognised, however, that the LPR demonstrates a considerable housing shortfall and whilst there is a sizeable contribution by windfall sites, of which the ongoing residential proposals could form part of the potential quantum, it is contended that further sites should be allocated to provide more certainty regarding where development is identified and the rationale underpinning this inclusion, particularly given the increase in the identified shortfall from 1,661 dwellings to 1,809 dwellings between the Reg.18 and Reg.19 versions of the LPR.

It is noted from review of the current LPR allocations that the Council is not averse to allocating land in the countryside or to amend settlement boundaries. It is also pertinent to highlight Full Councils concerns about delivery at the scale identified in respect of the NE Thatcham allocation. In this context, and irrespective of any changes to 5YHLS guidance, it is considered that allocation of the proposed residential land at NCGC is merited. The 2 hectares of land proposed for residential development is relatively flat with no long distance views. It is well-screened and fully enclosed by existing woodland, both around the development parcel and at site boundaries and a landscape-led scheme that will enhance and improve the visual amenity of the local area and provide 10% biodiversity net gain has been developed. Use of additional owned by NCGC to enhance the natural environment on the edge of Newbury and provide improvements to access and usability of surrounding public rights of way as part of the residential proposals, will lead to considerable improvements to the amenities, wellness and mental health of both existing and future local residents.

In its current form, it is therefore considered that Policy SP13 has not allocated sufficient sites to help meet the District-wide shortfall of 1,809 dwellings identified in the LPR. The allocation of residential development at NCGC would not only help towards more effective delivery against identified housing need, but would also support other policy aspirations of the LPR relating to support for the rural economy and local community facilities (in this regard, please see our additional comments against Policies DM35 and DM39, below).

Policy SP13 – Sites allocated for residential and mixed-use development in Newbury and Thatcham is Objected to, because it is considered that accommodation can be made for the proposed residential development at NCGC, which should be included in the list of larger sites (1ha or larger) for the allocation of c.31 dwellings.

Policy DM35 - Sustaining a prosperous Rural Economy

NCGC is a rural 'not for profit' company, located beyond the settlement boundary of Newbury, but in an area adjacent to many homes and local residents who make use of its attractive open spaces to play golf and enjoy the countryside. The sport of golf is currently under a great deal of pressure. Overall, player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. In this context, there have been two recent closures; the Racecourse and Donnington Valley, the latter of which has closed to members.

Whilst the Covid period provided a small boost in numbers to NCGC when golf provided that chance to enjoy sport in safety, the financial pressures have remained and change is required. There are several examples of other golf courses within the Council area or in adjacent Districts and Boroughs seeking to similarly plan for their future through discreet residential development and/or diversification of the leisure offer.

It is therefore important to plan proactively to ensure retention of sports and leisure facilities for the local community, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being. NCGC is a leisure facility located in a rural area in a very accessible location. It is a business that supports 19 on-site, as well as a number of associated indirect jobs, which leads to overall investment of over £500k per annum in the local economy. NCGC also maintains 50 hectares of attractive countryside, which would otherwise suffer from lack of stewardship. There are significant community, well-being and environmental benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.

Policy DM 35 states that proposals for development relating to rural enterprises, such as NCGC, should demonstrate that they comply with a long list of criteria. As mentioned previously, NCGC proposes to demolish and replace its existing clubhouse and car park. The new clubhouse will have much-improved

facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements will be possible because the golf club owns 50 hectares of rural land, which offers tremendous scope for investment in the local area. It will not just be a case of allocating 2 hectares of land and getting c.31 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.

The development proposals, which are supported by England Golf and Sport England, will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible if an enabling development of c.31 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide capital to ensure the golf club is robust and can thrive into the future.

Policy DM39 - Local Community Facilities

NCGC is a leisure-based business, located adjacent to many homes and local residents in the Newbury Area who make use of its attractive open spaces to play golf and visit the facilities. The sport of golf is currently under a great deal of pressure. Player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. Against this, it is important for the local community to have access to sports and recreation facilities, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being. In this regard, it is noted that in supporting text to Policy DM39, paragraph 12.62 identifies 'Areas or places for community outdoor sport or recreation' within the definition of local community facilities.

NCGC is a leisure facility located in a highly accessible location. It is a business that supports 19 FTE jobs and it maintains c.50 hectares of attractive and maintained land, which would otherwise suffer from lack of stewardship. There are significant community, well-being and environmental benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.

Policy DM39 provides support for new and expanded provision of local community facilities, subject to meeting a number of criteria relating to need, accessibility, design, engagement and use of spaces. The proposals at NCGC have been subject to lengthy and meaningful engagement and consideration to identify how to best respond to changing needs and demands in the golf industry and to deliver on inclusivity and diversity ambitions and these are manifest in the planning applications submitted to the Council for its consideration.

The new clubhouse will have much improved facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements have been suggested through the planning applications, as have improved access and extensions to public rights of way around the golf course. The golf club ownership of c.50 hectares of rural land offers tremendous scope for investment in the local area. It will not just be a case of allocating c. 2 hectares of land and getting c.31 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.

A scheme of c.31 dwellings is currently proposed, which has been subject to significant due diligence at pre-application stage and identified as a quantum that could provide the quantum of enabling development desired, whilst also ensuring that the minimum level of development required is progressed. Retention of long-term golf at NCGC is the scheme driver and the residential development is being progressed solely to fund this. A detailed Business Case has been submitted to the Council to set out issues and options leading to the development decisions made, these being subject to robust Viability Review.

The improvements to the clubhouse and course will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible in these testing times, if an enabling development of c.31 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide capital to ensure the golf club is robust and can thrive into the future.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Should the Council consider the representations made in support of allocation of land at NCGC for residential development to have merit, NCGC respectfully suggest the following policy wording:</p>

	<p>Policy RSA XX – Land at Newbury and Crookham Golf Club, Greenham, Newbury (Site Ref: GRE10 and GRE11)</p> <p>The site, as identified on the indicative map [<i>the attachment 'Opus Works (NCGC & Chartfield) Appendix 1 includes a plan of the site</i>], has a developable area of 2 hectares and is proposed to be allocated for residential development comprising c. 31 dwellings, made up primarily of family-sized homes.</p> <p>Development will be delivered in accordance with the following parameters:</p> <ol style="list-style-type: none"> 1. The provision of c.31 dwellings will be developed at a mass and density that reflects the character of the adjoining settlement. 2. The site will be developed in accordance with the Landscape Sensitivity Assessment (2011). 3. The design and layout of the development will be further informed by a full detailed LVIA as required by Policy SP8. 4. The scheme will provide significant Green Infrastructure improvements in accordance with Policy SP10. 5. The scheme will include at least 10% bio and geodiversity net gain in accordance with Policy SP11. 6. The scheme will be supported by an extended phase 1 habitat survey, together with further detailed surveys arising from that as necessary. 7. The scheme will be informed by a FRA, which will advise on any necessary flooding and drainage mitigation measures. 8. A Transport Assessment will be required to establish the appropriate locations for access onto the wider road network and to ensure appropriate measures are put in place to mitigate impacts on the highway network. 9. As the proposal is to enable redevelopment of an existing Local Community Facility, a S106 agreement will be required to ensure that capital released by the development is only spent on the redevelopment of the NCGC clubhouse and other improvements to the golf course to improve its long-term viability. 10. A Viability Report will be required to identify the level of affordable housing capable of being supported by the enabling residential development.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pike, Simon
<p>Consultee Full Name</p>	Simon Pike
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS1308
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The Regulation 18 Emerging Draft Local Plan included a Policy RSA1 for a non-strategic site allocation for the Kennet Centre Newbury: "Policy RSA 1

The Kennet Centre, Newbury (Site Ref: NEW3)
The site, as identified on the indicative map, is proposed to be allocated for a mixed-use development that includes approximately 250 dwellings. The residential aspect would complement the existing uses on the site.
The site occupies a highly sustainable location and may present opportunities for higher densities than estimated using the West Berkshire Density Pattern Book, as much will depend on the mixture of uses and design of the development.
Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements, and will include the need for the design and scale of development to complement existing buildings and the Newbury Conservation Area.”
This site allocation was included in its Policy SP13 “Sites allocated for residential and mixed-use development in Newbury and Thatcham”.
However, this non-strategic allocation has been excluded from the Regulation 19 draft Local Plan.
The Regulation 18 representations (contained in the Consultation Statement) on this policy and site allocation were generally supportive, provided that it is at an appropriate scale. West Berkshire Council gave the following responses to these representations:
“it is no longer proposed to allocate the Kennet Centre as the site is located within the settlement boundary. Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable. The LPR will not include allocations within settlement boundaries.”
The logic of this response is unclear. There are many places within settlement boundaries that are not suitable for development, such as parks and open spaces. If the purpose of the Local Plan is to “create a level of certainty about whether or not the principle of development is likely to be acceptable”, then it is illogical for the Plan not to identify those locations where the principle
“The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1.
The site was originally promoted as part of the ‘call for sites’ for the Housing and Economic Land Availability Assessment (HELAA) in 2017. The promoter at the time indicated that there was potential to accommodate residential and/or a hotel to complement the existing uses on the site.
The Level 1 Strategic Flood Risk Assessment (SFRA) indicated that 40% of the site was within Flood Zone 1 (low risk of flooding), with 60% within Flood Zone 2 (medium risk of flooding). The Site Selection Background Paper for the emerging draft (Regulation 18) Local Plan Review (LPR) therefore advised that any residential development should be located within the southern area of the site which falls within Flood Zone 1.
Since the Regulation 18 consultation on the LPR, the site has changed ownership and alternative proposals have been put forward by the promoter. These proposals seek a comprehensive redevelopment with residential uses spread across much of the site.”
The first paragraph of this response is contradictory: Policy SP1 gives a presumption in favour of development but, if there is a flood risk (which I question below), then Policy SP6 would give a presumption against development.
Since the Regulation 18 consultation, a detailed planning application has been made for this site, with the name of ‘Eagle Quarter’. This application provided retail space on the ground floor, with housing at higher levels. This application was refused on grounds of over-development, but any future application is likely to devote the ground floor to retail and business units.
Paragraph 85 of NPPF states:
“The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”
And Paragraph 119 states:
“Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”
The Kennet Centre clearly falls into the definition of “previously developed land” in the glossary of NPPF.
Paragraphs 159 and 160 of NPPF state:
“inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources.”
If the dwellings on this site are restricted to the first floor and above, and the access to these dwellings are limited to locations within the 40% of the site in Flood Zone 1, then the residential element of the development is not at risk of flooding, and this development cannot therefore be considered as ‘inappropriate. A sequential and exception test would therefore conclude that the residential aspect of the development is acceptable.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>

4. Proposed Changes	Policy RSA1 should be restored to the draft Local Plan, with appropriate conditions added to ensure that the residential element is not at risk of flooding. It should then be included in Policy SP13. The number of additional homes defined in Policy SP12 should be adjusted accordingly.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hindocha, Atul (Represented by Iver Consulting Ltd)
Consultee Full Name	Atul Hindocha
Consultee Organisation	
Agent Full Name	Huw Williams
Agent Organisation	Iver Consulting Ltd
Comment ID	PS1655
Chapter / Policy / Appendix Number	Policy SP 13
Chapter / Policy / Appendix Title	Sites allocated for residential and mixed-use development in Newbury and Thatcham
Order	42
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:00:00
Attached Files	PS1655 Iver (A. Hindocha) FRA.pdf PS1655 Iver (A. Hindocha) Proposed Scheme.pdf PS1655 Iver (A. Hindocha) Site Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>NPPF clearly states Brownfield sites to be brought forward for development prior to the release of greenfield sites</p> <p>Thatcham has been identified for strategic development with a major greenfield release. Brownfield sites have been failed to be reviewed, and should be brought forward prior to the release of greenfield sites in Thatcham</p> <p>Former Newbury Leisure Park is a 4.25 acre redundant brownfield site, in a residential area</p> <p>It is already developed land since 1980s with a commercial building of 37,500 sqft, and residential dwellings called Moorstream Cottages of 3,300 sqft. The commercial building has become redundant as a leisure facility (3 operators have gone into administration over 9 years) and has been derelict since 2021. It attracts vandalism, crime, and demands time from the emergency services.</p> <p>An FRA has been produced which outlines a strategy to overcome flood plain issues which exist on 25% of the site.</p> <p>The site is in a sustainable location suitable for residential development.</p> <p>The site is immediately available for development</p> <p>Background</p> <p>I have owned the above property for several years when it was operating as a Ten Pin Bowling centre with ancillary uses such as soft play/refreshments. Between 2012 and 2020, there have been 3 leisure operators that have gone into administration whilst running their businesses at this site, demonstrating that both national leisure chains and private businesses cannot successfully operate a leisure business at this site. Sadly, as a result of the Pandemic, the operator never re-opened after the enforced closures. Despite being marketed since 2021 and being available, it has since remained vacant. The premises are now falling into a poor state of repair and the number of break ins is only on the increase.</p> <p>During 2020 and 2021, I was in constant dialogue with the Economic Development Team at West Berks, and they agreed there is no economic viability of this site for leisure use. In fact, the Economic Development Team discussed the demise of this site with the Economic Development Board, and concluded that they would support a planning application for residential and or use for the Care sector.</p> <p>In response to approaches received from the planning policy team, submissions highlighting the site's availability were made to the draft plan consultation(2021), the site promotion register, and the Brownfield Register in 2021. Despite this I am disappointed over the lack of engagement with the Council to bring forward this site forward for re-development and that the site should be allocated for residential /care home development in the forthcoming review of the Local Plan. This is based on the following;</p>

	<p>Re-use of brownfield sites prior to the release of greenfield land for development</p> <p>It is a requirement of all Local Authority's to seek the re-use of brownfield sites prior to the release of green field sites for residential development. This is particularly so when sites such as the former Newbury Leisure Park are redundant and available for development.</p> <p>Significant releases on greenfield sites are being proposed in the Thatcham area which should only occur once all potential brownfield opportunities have been utilised. With the omission of our site the Council have failed to do this and should review their allocations.</p> <p>Suitability of development</p> <p>The overall site extends to 4.25 acres. It is in a sustainable location with easy access to local amenities such as schools, shops, on the main bus routes and open space.</p> <p>Within the site are the former Bowling Centre/Soft Play centre which is some 37,500 sq.ft. Also located on the site are Moorstream Cottages which are 3,300 sq.ft. To support the Bowling Centre the site has car parking for 180 cars on hard standing tarmac. Significant development is therefore already accommodated on site.</p> <p>The site is falls partly within Flood Zones 2 and 3. To address this concern we commissioned Floodline Consultants to provide a Flood Risk Assessment, a copy of their Non-Technical Summary is attached. It concluded that, taking into account the flood zones, a minimum of 2 acres of land was capable for development. This could be increased further following a detailed hydrological assessment. It is our view that the site is therefore capable of accommodating a care home and ancillary residential development or 80 to 100 residential units.</p> <p>Demand for current use</p> <p>Since the premises became vacant (Jan 2021) we have been marketing the premises to find an alternative occupier or use for the site. During this period, we have had no enquiries to use the premises for leisure use. The trend for such uses as ten pin bowling centres has been for them to locate in town centres as part of a mixed-use scheme which is not able to be achieved in this location. Further detailed commentary on this can be provided by the joint agents Haslams and Re-made UK</p> <p>Need to accommodate demand for C2 (care) accommodation / housing in Thatcham</p> <p>Since the COVID pandemic the care sector has been under close scrutiny, with numerous sub-standard homes being closed. This has been combined with an increase in demand for care provision due to an increase in life expectancy and our ageing population increasing. This has led to more modern care homes being built, often providing a range if accommodation to reflect the varying needs of the elderly. Never has there been a stronger case for catering for this demand.</p> <p>The former Newbury Leisure Park provides a perfect opportunity to part meet this need for the Newbury area. It is a brownfield site and is of a size which can accommodate a care home of up to 90 beds, with ancillary or open residential units in the grounds. Safe access can be provided to the highway network and wonderful views over the lakes can be offered to the residents.</p> <p>Concluding remarks</p> <p>The former Newbury Leisure Park, given it's a redundant brownfield site should be given priority by West Berkshire District Council to enable it to be re-developed prior to the release of greenfield sites. We would therefore ask the Council, in reviewing its current Local Plan, to;</p> <p>- Allocate the site for residential / care development</p> <p>The NPPF states "local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs"</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Former Newbury Leisure Park site, Lower Way, Thatcham to be added for up to 90 residential units.</p> <p>Allocate the site for residential/care development</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>The use of brownfield sites prior to greenfield release should b a fundamental objective of the local plan which needs to be addressed. We would therefore wish to have a seat at the examination.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Way, Joelle
Consultee Full Name	Joelle Way
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS31
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	06/02/2023 17:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<ol style="list-style-type: none"> 1 The plan is being rushed through so as to meet artificial deadlines. 2 The current Local Plan Core Strategy contained the following statement: "The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". No justification has been given as to why this requirement, which is still much needed, has not been carried forward into the Local Plan Review. 3 It excludes developments of more than 10 homes from its estimates of the number of "windfall" sites (sites in towns and villages that are not on sites allocated in the plan). Many windfall sites are bigger than 10 homes - Cumber Place and Trafalgar Court in Theale both contain around 30 homes. 4 Concerns (2) and (3) mean that more homes than necessary would be built on greenfield sites like those proposed for Theale.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Weston, Sarah</p>
<p>Consultee Full Name</p>	<p>Sarah Weston</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS53</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 14</p>

Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 20:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We have not seen the impact of the development on the village. The doctor's surgery is already under pressure and the waiting time for appointments is too long. The children's parks are two small already. Even though they have recently been improved anyone who has visited them at the end of the school day can see they are still inadequate. The impact on wildlife and the climate criss by removing the few remaining green areas at a time we should be preserving and improving green spaces is irresponsible.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Valentine, Lynn
Consultee Full Name	Lynn Valentine
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS40
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	22/01/2023 18:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I came to this village 37 years ago to live in a village not a town It has grown so much with houses and businesses But now coming to my retirement I find I am living in a little town Not what I invested in 37 years ago But now find I am not in the persision to move to a village I understand the need for more house but No Schools No Doctors No Dentist More Traffic Drainage How much more can this village (small town) take ? I am sure I am not the only person upset at what you are building around Theale Village</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>N/A</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	<p>N/A</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Aldermaston Parish Council
Consultee Full Name	Aldermaston Parish Council
Consultee Organisation	Aldermaston Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS433
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We note no new housing is proposed for the Parish of Aldermaston, due to its proximity to AWE (A). (Policies SP-4 and SP-12).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council

Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS605
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 19. HSA15. We object to this as there is a strong possibility that an increase in the population would use Theale's facilities which are already struggling e.g. GP surgery, schools etc.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tipper, KP & JP
Consultee Full Name	KP & JP Tipper
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS379
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 10:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I really can't believe all the plans of new houses that are being made for our lovely village!! We certainly do not have the facilities to cope with all the houses in the pipe line for Theale.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS535
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:29:51
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	The policy identifies a limited number of sites for development in the Eastern Area, which is the area likely to have the greatest implications for Reading. Of these, only three sites (RSA6, RSA7 and RSA8) are within the Reading urban area itself, and the total development proposed within those sites is 70 dwellings and 65 residential care bedspaces. All of these sites are already allocated within the existing Local Plan. There are no significant cross-boundary implications as a result of this policy which RBC therefore supports.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Stratfield Mortimer Parish Council
<p>Consultee Full Name</p>	Lynn Hannawin
<p>Consultee Organisation</p>	Stratfield Mortimer Parish Council
<p>Agent Full Name</p>	Lynn

	Hannawin
Agent Organisation	
Comment ID	PS608
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:46:28
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	6.36 identifies Mortimer as a Service Village whereas in the hierarchy of settlements it is defined as a Rural Service Centre i.e. one level higher
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1212
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Our client has an agreement with the landowners of the site, known as 'Land to the rear of The Hollies' in the District, which currently forms part of an allocated site for approximately 60 dwellings under Policy HSA16 in the adopted Housing Site Allocations Development Plan Document (HSADPD) (May 2017).</p> <p>It is understood the 'emerging draft' Local Plan Review (LPR) no longer seeks to carry this allocation forward. This is despite part of the allocated site having already been built out and now occupied by residents. The Council say this is because the site now falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. The DEPZ was extended as a result of the updated Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019.</p> <p>Our client does not support the removal of this allocated site from the Development Plan. Our client is keen to work collaboratively with the Council to secure the development of the remaining part of this currently allocated site. These representations therefore focus on responding to the removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield.</p> <p>These representations also seek to respond to the Council's development strategy (including Policies SP1 and SP3, SP12 and SP14) and decision-making in relation to an effective 'moratorium' on new development within Burghfield Common, despite the village remaining as a 'Rural Service Settlement', which offers 'development potential appropriate to the character and function of the settlement', according to the proposed Spatial Strategy.</p> <p>These representations also discuss Policy RSA12, which seeks the provision of approximately 100 dwellings within Burghfield Common1, within the extended DEPZ.</p> <p>In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021) paragraph 35. This identifies that a sound Plan is:</p> <p>1 a) Positively Prepared– 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development';</p>

	<p>b) Justified – ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’;</p> <p>c) Effective – ‘deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground’; and</p> <p>d) Consistent with National Policy – ‘enabling the delivery of sustainable development in accordance with the policies in this Framework’.</p> <p>It is in light of these criteria that the LPR (Regulation 19) version has been considered. We find the de-allocation of site HSA16 is not consistent with the Council's approach to its development strategy and the settlement hierarchy. In addition, its approach towards a ‘moratorium’ on further development within the parish of Burghfield Common is flawed.</p> <p>Policy SP14 relates to sites allocated for residential development in the Eastern Area. An allocation of 100 dwellings on land adjacent to Pondhouse Farm (Policy RSA12) is identified for Burghfield Common. The Reserved Matters for this site were approved by the Council on 29 July 2022, despite Officer's confirming the development “<i>would bring perhaps an additional 240 plus residents into the AWE inner protection zone as defined under policy CS8 in the WBCS of 2006 to 2026, since planning permission was granted prior to the new DEPZ being agreed, the Council cannot object to the development</i>”.</p> <p>Conclusion</p> <p>These representations have been prepared by Pro Vision on behalf of our client, T A Fisher & Sons, in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039 (Regulation 19) (January 2023).</p> <p>Our client has an agreement with the landowners of the site known as ‘Land to the rear of The Hollies’ in the District, which currently forms part of allocated site ‘HSA16’, in the adopted HSADPD (May 2017). We note the allocation for the site is no longer included within the ‘emerging draft’ LPR, as the site falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield, despite there being a remainder of 32 units still to be delivered.</p> <p>Our client does not support the removal of this allocated site from the LPR.</p> <p>These representations have therefore focused on responding to the unjustified removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield as well as the development strategy and spatial hierarchy proposed by the LPR.</p> <p>In particular, we consider the remaining number of dwellings should be carried forwards in the LPR as the development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	To ensure that the views of our client in respect of the removal of the allocated site known as ‘Land to the rear of The Hollies, Burghfield Common’ and the inconsistencies in the spatial strategy, particularly towards development within the DEPZ, are heard
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1195
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	Yes No

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>AWE fully supports the non-allocation of the Grazeley Garden Town under this Policy, given its location within the DEPZ for AWE Burghfield.</p> <p>AWE object to the re-allocation of land adjoining Pondhouse Farm, Clayhill Road. Despite this allocation being within the current local plan, due to the redefining of the DEPZ during the plan period, this allocation for 100 residential units would now be in direct contravention of SP4 as the site is located within the Burghfield DEPZ; in applying policy SP4 the allocation is "likely to be refused planning permission..... especially when the ONR and/or MOD have advised against the development and/or object".</p> <p>Para 6.35</p> <p>AWE is supportive of no additional sites being brought forward through Neighbourhood Plans in the Eastern Area given that Burghfield Parish lies within the DEPZ for AWE Burghfield.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Removal of Pondhouse Farm allocation
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Donnington New Homes (Represented by Turley)
<p>Consultee Full Name</p>	Donnington New Homes
<p>Consultee Organisation</p>	Donnington New Homes
<p>Agent Full Name</p>	Mr Tim

	Burden
Agent Organisation	Turley
Comment ID	PS1827
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

Please give reasons for your answer

3. Regulation 19 Proposed Submission document representations

Proposed residential site allocations

3.17 Having taken into account existing commitments and windfalls, the draft Plan proposes the delivery of 4,252 dwellings through specific housing allocations. The following allocations are retained allocations from the adopted Core Strategy and Site Allocation documents.

3.19 The following sites are proposed in the Eastern Area:

Retained allocations

- 72 Purley Rise, Purley on Thames (RSA7) – 35 dwellings
- Land adjacent to Bath Road and Dorking Way, Calcot (RSA8) – 35 dwellings
- Land between A340 and The Green, Theale (RSA9) – 100 dwellings
- Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (RSA12) – 100 dwellings
- Stonehams Farm, Tilehurst (EUA003) (RSA6) – 65 bedspace care home

New allocations (totally 140 dwellings)

- Former sewage treatment works, Theale (RSA11) – 60 dwellings
- Whitehart Meadow, Theale (RSA10) – 40 dwellings
- Land north of A4 at junction of New Hill Road, Woolhampton (RSA13) – 16 dwellings
- New Stocks Farm, Paices Hill (RSA24) – 8 pitches

3.21 Some of the above allocations are retained from the previous adopted plan period of 2006 – 2026 due to the overlap of the plan period for the emerging plan (2022 – 2039). These amount to 2,652 dwellings that were outstanding from the previous plan period at 31st March 2022.

3.22 New sites proposed for allocation in the new plan period total 1,720 dwellings, which with 1,500 proposed at North East Thatcham.

3.23 The proposed allocated sites are listed in the table below, along with a review of their current planning status. We would question why some are retained as allocations, rather than commitments, given their planning status.

Retained allocation from Core Strategy: Land adjacent to Bath Road and Dorking Way, Calcot 35 dwellings

Planning status: Hybrid application for 28 dwellings and pub – refused June 2018. Dismissed at appeal March 2019.

Full application 22/01836/FULEXT for a 70-bed care home received 1 August 2022, pending determination.

Outline planning application 22/01829/OUTD for up to 9 residential dwellings received 28 July 2022, pending determination.

It is therefore unclear how this site can be identified for 35 dwellings, following the dismissed appeal and very different proposals now submitted on it.

Retained allocation from Core Strategy: Land between A340 and The Green, Theale 100 dwellings

Planning status: Outline application 17/02904/OUTMAJ for up to 104 dwellings approved December 2020.

No reserved matters application submitted and the outline permission will lapse imminently.

The lack of delivery at this site has been subject to much discussion, and its ability to be brought forward continues to be subject to debate.

Retained allocation from Core Strategy: Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common 100 dwellings

Planning status: Outline application 18/02485/OUTMAJ for 100 dwellings permitted December 2019. Reserved matters 22/00325/RESMAJ approved July 2022.

It is stated that the developer anticipates development could commence in 2022/23, yet we do not believe it has commenced.

Retained allocation from Core Strategy: Stonehams Farm, Tilehurst (EUA003)

65 bedspace care home

Planning status: Outline application 16/01947/OUTMAJ for 15 dwellings approved June 2017. Full planning application 21/01216/COMIND for 64 bed care home approved in August 2021 and expected to be implemented.

3.24 The Eastern Area has been taken out of the spatial strategy for the LPR, yet some 343 dwellings are being retained as allocations in this area with a total of 459 dwellings proposed (i.e. 116 dwellings in new allocations for the plan period). In addition, there are 334 dwellings across AONB sites, equating to 8% of the proposed housing supply for the plan. The Inspector’s Report for the adopted Core Strategy references a 2,000 dwelling cap within the AONB, stating for the Core Strategy to be found sound “*the reference in policy ADPP5 [N.B. Policy ADPP5 refers to North Wessex Downs AONB] to 2,000 dwellings needs to be prefaced with up to so as to make clear that it is not a minimum that has to be achieved and that delivering less is acceptable.*” (paragraph 78).

4. Sustainability Appraisal scoring for Land at Long Lane, Newbury

Conclusions on site selection and SA

4.20 We consider that the LPR Sustainability Appraisal (“SA”) has therefore not considered reasonable alternative options, which is inarguable given the omission of any consideration of sites not included within the Plan. The SA is therefore in breach of the SEA Directive and the SEA Regulations and these breaches are fatal to the legality of the LP.

4.21 Additionally, it calls into question the entire site selection process if a site has been assessed and rejected for technical reasons when no legitimate and substantiated technical reasons exist to justify such an outcome. This, we submit, suggests that the entire site selection process is fundamentally flawed, particularly given the conflict with the identified spatial strategy.

4.22 The draft Plan proposes sites in the AONB, and the eastern area which does not accord with the Council’s spatial strategy.

4.23 There are only two strategic site allocations (SP16 Sandford Park and SP17 North East Thatcham), the remainder are relatively small sites (between 15-160 dwellings). The Sandford Park allocation has outline planning permission allowed at appeal for two-thirds of the allocation. The remainder of the site is under Donnington New Homes’ ownership and there is a live planning application pending determination (reference 18/00828/OUTMAJ).

4.24 It is considered the plan does not propose medium sized sites that can come forward in the interim period to ensure housing delivery. The site at Long Lane for approximately 260 dwellings can provide a medium sized site that is available and deliverable under land controlled by Donnington New Homes. The SA conclusions state that the negative and uncertain effects may be able to be mitigated further. It is considered the uncertain and negative effects identified in the SA can be overcome through a well-designed scheme and submission of information, resulting in positive impacts.

4.25 The planning merits of the Site considered in section 2 of these representations demonstrate that there are no in-principle technical barriers to prevent residential development of the site.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>

5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Berkshire Oxfordshire Bucks Integrated Care Board
Consultee Full Name	BOB Integrated Care Board
Consultee Organisation	BOB Integrated Care Board
Agent Full Name	Helen Clark
Agent Organisation	
Comment ID	PS1134
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 17:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It is noted that 200 new housing units will be provided in Theale (RSA 9,10 and 11) and that there are also 35 Housing units to be provided in Calcot (RSA 8) and 35 in Purley (RSA 7). It is further noted that in the current (2016) iteration of the West Berkshire IDP, that within the table on page 60, “Improvements to GP premises in area of development. Approx additional 50 sq.m” are described as being required to mitigate housing growth at “Tilehurst, Calcot, Purley, Theale”. This Table indicates that this 50 sq m is a collective total of new floor space that should be paid for by developer contributions at a cost of £150,000. The ICB’s view is that the 50 sq m currently articulated should be described as a net (as opposed to gross) floor area. Furthermore, as 50 sq m net space would cost around £350k to build as at Q1 2023 prices, not £150k as stated. The ICB considers that if developer contributions were sought that amount to £350k, this would be sufficient for the local GP Practices to deal with the additional capacity, either through 50 sq m of additional space, or through the provision of internal modifications to create additional clinical/patient-facing space.</p> <p>The ICB note that there are also 100 housing units planned in Burghfield (RSA 22) – part of the Local Plan Review SP14. It is further noted that the mitigation for this is described in the IDP as “Improvements to GP premises in area of development. Approx additional 25 sq.m” at a cost of £75,000. The ICB’s view is that the 25 sq m currently articulated should be described as a net (as opposed to gross) floor area. Furthermore, as 25 sq m net space would cost around £175k to build as at Q1 2023 prices, not £75k as stated. The ICB considers that if developer contributions were sought that amount to £175k, this would be sufficient for the local GP Practices to deal with the additional capacity, either through 25 sq m of additional space, or through the provision of internal modifications to create additional clinical/patient-facing space.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Save Calcot Action Group/Save Pincent's Hill Group
Consultee Full Name	Mrs Joan Lawrie
Consultee Organisation	Save Calcot Action Group/Save Pincent's Hill Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1116
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>There would appear to be several facts that are incorrect in the assessment. All we can conclude is that the writer has not visited the area.</p> <ol style="list-style-type: none"> 1 Nearly all of Pincents Lane is single lane only with no room for pedestrians other than the banks. There are only 3 areas where a car can pull in to allow for vehicles to pass one another. (It is stated that there are only 2 pinch points – clearly not so). 2 The dust carts sometimes don't come down the lane on icy days as they consider it too steep and dangerous. Notwithstanding, that the dust carts are too wide for the lane and have damaged the banks by approximately 1ft on each side. There is a stream from the top field which runs diagonally across the lane into Pincents Hill which freezes. (Picture attached). A few years ago, the stream stripped the top layer off the surface which slipped downhill and had to be replaced. This should be on file. 3 It is not clear from this document whether it is intended to open this lane up from the A4 to City Road/Little Heath Road. This road was closed approximately 18 years ago after an accident involving a school child and to prevent further accidents as there are 3 local schools. If this road is opened up City Road and Little Heath Road would be a rat run to Reading and Oxford and the risk to school children greatly increased. The immediate area would see a devastating increase in traffic. The turning area for buses coming from Little Heath Road into City Road is too narrow and they are forced to turn into the oncoming car lane. 4 Pincents Lane is an ancient sunken lane, unique to this area which adds to the character of the locality and should be regarded as part of our heritage. The lane is on ancient maps which show the borders of The Common which was 1,000 acres with its hedgerows. All that remain of that 1,000 acres is Prospect Park, Pincents Hill and the Allotments. 5 If this is a Council document that states there are two footpaths on the hill but clearly your files show 4. <p>Footpath 20© Tilehurst</p> <p>This footpath running north-south, which local people applied over ten years ago to have added onto the Definitive Maps as close as possible to its actual route but because trees have grown on the original path and now needs a diversion order.</p> <p>Footpath 14 Tilehurst</p> <p>This footpath is very well used as a direct link between Starlings Drive and the Recreation Ground/Calcot Centre/Sainsbury's and beyond. It was recently provided with an improved surface by West Berkshire Council. The upgrading of the route to a cycleway should be considered.</p> <p>New definitive footpath to link Footpath 13 Tilehurst and Footpath 12 Tilehurst</p> <p>Footpath 12 Tilehurst to the north of the site forms part of one of the Council's promoted circular walks (around Sulham Valley, specifically the Green Route).</p> <p>Any development on this site will have a considerable impact on the Rights of Way network and the scale of the development proposed, has huge implications both on the footpath network within the site and immediately beyond the site boundaries.</p> <ol style="list-style-type: none"> 1 There is mention of a possible provision of a school and yet West Berkshire has previously said that the current education needs can be met and that pupil numbers will decrease over time. 2 There have been seven planning applications on this site since 1985 and 3 failed planning appeals all of which failed mainly because this piece of land forms a gap between settlements and would appear that it retains this status in the New Local Plan. The new draft NPPF rules do not seem to have changed in this respect and actually seem to favour Neighbourhood Plans, <p>If this is so, why is the Council listing all the reasons why this site should even be considered for development. Although at the moment it may not be, however it would appear to be encouraging the owners to put in another planning application. It is known that the Council has to consider every application for development, so all we can assume is that a development could take place.</p> <p>Could and would West Berkshire Council decide during the period of the plan to rescind the Gap Between Settlement status and what would be the criteria for doing this?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1207
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 10:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	No
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	No

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Our client has an agreement with the landowners of the site, known as 'Land to the rear of The Hollies' in the District, which currently forms part of an allocated site for approximately 60 dwellings under Policy HSA16 in the adopted Housing Site Allocations Development Plan Document (HSADPD) (May 2017).</p> <p>It is understood the 'emerging draft' Local Plan Review (LPR) no longer seeks to carry this allocation forward. This is despite part of the allocated site having already been built out and now occupied by residents. The Council say this is because the site now falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. The DEPZ was extended as a result of the updated Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019.</p> <p>Our client does not support the removal of this allocated site from the Development Plan. Our client is keen to work collaboratively with the Council to secure the development of the remaining part of this currently allocated site. These representations therefore focus on responding to the removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield.</p> <p>These representations also seek to respond to the Council's development strategy (including Policies SP1 and SP3, SP12 and SP14) and decision-making in relation to an effective 'moratorium' on new development within Burghfield Common, despite the village remaining as a 'Rural Service Settlement', which offers 'development potential appropriate to the character and function of the settlement', according to the proposed Spatial Strategy.</p> <p>These representations also discuss Policy RSA12, which seeks the provision of approximately 100 dwellings within Burghfield Common1, within the extended DEPZ.</p> <p>In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021) paragraph 35. This identifies that a sound Plan is:</p> <p>a) Positively Prepared – 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development';</p> <p>b) Justified – 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence';</p> <p>c) Effective – 'deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground'; and</p>

d) Consistent with National Policy – ‘enabling the delivery of sustainable development in accordance with the policies in this Framework’.

It is in light of these criteria that the LPR (Regulation 19) version has been considered. We find the de-allocation of site HSA16 is not consistent with the Council's approach to its development strategy and the settlement hierarchy. In addition, its approach towards a ‘moratorium’ on further development within the parish of Burghfield Common is flawed.

As outlined in Section 1, the LPR no longer seeks to carry forward the site subject of these representations as an allocated site for residential development.

HSADPD Policy HSA16 sets out to deliver approximately 60 dwellings with a mix of dwelling types and sizes, as did draft Policy RSA19 of the Local Plan Review 2020-2037 (Regulation 18), although this has since been removed from the latest iteration of the Local Plan Review 2022-2039 (Regulation 19).

In Appendix 7 (Schedule of Policies to be Superseded / Deleted) of the LPR there is no explanation why the site has been removed from the Plan, simply that *“The following site allocation policies from the Housing Site Allocations DPD 2006-2026 have not been carried forward as part of the LPR because they are not considered deliverable at this time:*

- *HSA6 Poplar Farm Cold Ash*
- *HSA16 The Hollies Burghfield Common”.*

The definition of ‘deliverable’ is provided within the NPPF and states: *“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years...where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.*

The site is under option to a housebuilder who has submitted a full application for planning permission on the allocated site. The site is therefore regarded as deliverable under the NPPF definition.

The currently allocated site's recent planning history is necessary to consider and is summarised below.

- APP/W0340/W/22/3312261 – appeal against the refusal of application 22/00244/FULEXT on land to the rear of The Hollies – submitted to the Planning 30 November 2022 (elevated to an Inquiry – currently undetermined at the time of this representations submission).
- 22/02010/PREAPP – *“pre-application advice consultation for a proposed development of up to 32 residential dwellings (Use Class C3), including access, associated parking, landscaping and Public Open Space (POS)”* on land to the rear of The Hollies – advice received 1 November 2022.
- 22/00244/FULEXT – *“erection of 32 dwellings including affordable housing, parking and landscaping. Access via Regis Manor Road”* on land to the rear of The Hollies – refused planning permission 1 June 2022.

The 32 dwellings refused under application 22/00244/FULEXT sought to make up the remainder of the 60 allocated dwellings under Policy HSA16. The application was refused for the following (summarised) reasons:

1. The need for a legal agreement to secure Affordable Housing;
2. The site's location within the extended DEPZ and the impact of the development on public safety; and
3. The impact of the development on protected trees.

Reason for Refusal 1 and 3 are considered to be able to be suitably addressed. Reason for Refusal 2 is to be the main focus for discussion at the upcoming planning appeal Inquiry.

The following two applications relate to the eastern parcel of the allocated site (i.e. land which our clients do not have an interest in). Nonetheless, as the eastern parcel forms part of the same allocation and is within the extended DEPZ, its planning history is relevant.

- 19/00772/RESMAJ – *“approval of reserved matters application following outline application 16/01685/OUTMAJ for 28 dwellings. Matters to be considered: Appearance, Landscaping, Layout and Scale”* on land adjacent to Primrose Croft – granted permission on 8 August 2019.
- 16/01685/OUTMAJ – *“outline planning application for 28 dwellings. Matters to be considered: Access. Matters reserved: Appearance, Landscaping, Layout and Scale”* on land adjacent to Primrose Croft – granted outline planning permission on 30 October 2018.

The 28 dwellings on the eastern part of the allocated site have since been built out by Crest Nicholson Operations Ltd and are now occupied.

Table 3.1: Neighbourhood plans of the Site Selection Methodology (January 2023) identifies that within the Designated Neighbourhood Area of Burghfield Common, there will be no allocations as *“The Atomic Weapons Establishment (AWE) has a base within the Parish. Changes to legislation have resulted in the redetermination of the emergency planning arrangements around AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the whole Parish. Due to the presence of the DEPZ, it is not considered appropriate to allocate further sites for housing in Burghfield”.*

An update to the HELAA has been prepared (January 2023) as part of the evidence base which excludes the site. There is no commentary on why ‘The Hollies’ site has been removed from the HELAA. However, other sites within Burghfield Common (and therefore within the extended DEPZ) are shown as not being ‘automatically excluded’ from further consideration², although are noted not being deliverable for an arbitrary 15 years. However, this does imply that these sites might be deliverable within the longer term, which is an acceptance that the DEPZ is not in fact placing a moratorium on development.

The HELAA confirms at paragraph 2.2 that sites within notified safety zones (i.e. AWE Burghfield) will not automatically be excluded and instead *“the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. Therefore, sites within notified safety zones have*

	<p><i>gone through to Stage 2 of the HELAA (site assessment) and advice from the Ministry of Defence has been fed into the site assessment”.</i></p> <p>Taking the above into account and noting that other sites are put forward for residential development within the extended DEPZ, the site should not be excluded from the HELAA and we consider it remains still suitable, achievable, available and deliverable now, being within the control of our client, a local house builder.</p> <p>It is also relevant to note, having regard to the definition of “deliverable” in the NPPF, that the Council has carried forward the allocation of site at Poundhouse Farm (HSA15) into Policy RSA12 of the LPR. This allocation is for significantly greater development – 100 dwellings – than the 32 dwellings at The Hollies. The two sites share a boundary. Both sites are currently allocated within the Housing Site Allocations DPD. Both sites were regarded as deliverable in the Annual Monitoring report for 2021/22 and in the Regulation 18 Local Plan consultation before that, yet the Council has singled out The Hollies for deallocation. This is not positive planning. If this is allowed to continue, it will leave an undeveloped gap within the settlement policy boundary.</p> <p>In summary, we consider that the Council's failure to carry forward allocation HSA16 into the plan is not justified. No sound reasons have been provided and this results in the plan not being positively prepared. The LPR is therefore unsound as drafted.</p> <p>Conclusion</p> <p>These representations have been prepared by Pro Vision on behalf of our client, T A Fisher & Sons, in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039 (Regulation 19) (January 2023).</p> <p>Our client has an agreement with the landowners of the site known as ‘Land to the rear of The Hollies’ in the District, which currently forms part of allocated site ‘HSA16’, in the adopted HSADPD (May 2017).</p> <p>We note the allocation for the site is no longer included within the ‘emerging draft’ LPR, as the site falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield, despite there being a remainder of 32 units still to be delivered.</p> <p>Our client does not support the removal of this allocated site from the LPR.</p> <p>These representations have therefore focused on responding to the unjustified removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield as well as the development strategy and spatial hierarchy proposed by the LPR.</p> <p>In particular, we consider the remaining number of dwellings should be carried forwards in the LPR as the development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To ensure that the views of our client in respect of the removal of the allocated site known as ‘Land to the rear of The Hollies, Burghfield Common’ and the inconsistencies in the spatial strategy, particularly towards development within the DEPZ, are heard
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hallam Land Management (Represented by LRM Planning)
Consultee Full Name	Ruth McKeown
Consultee Organisation	Hallam Land Management
Agent Full Name	Owen Jones
Agent Organisation	L R M Planning
Comment ID	PS1391
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:13:00
Attached Files	Mortimer Vision Document.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>[See attached Mortimer Vision Document]</p> <p>Hallam control land at Mortimer in the east of the District that is eminently suitable for housing development, both in terms of the Plan's spatial strategy and its specific characteristics.</p> <p>As drafted, the consultation document does not afford a role to Mortimer in providing additional housing over that which is allocated in the current Stratfield-Mortimer Neighbourhood Plan. Yet, that Neighbourhood Plan was prepared in the context of the 2012 West Berkshire Core Strategy and covered the period to 2026.</p> <p>By simply rolling forward the current allocation to meet the new housing requirement to 2039, the growth of Mortimer is proportionately lower over the longer term.</p> <p>The Neighbourhood Plan describes particular socio-economic characteristics that are prevalent locally; the affordability of housing; a shortage of certain types of housing in the parish; an ageing population and an under-representation of young persons and families.</p> <p>Given that the existing allocation was to be developed by 2026 to assist in ameliorating these issues, the fact it is now proposed to be the only new housing over a much longer period will undermine its contribution. Those characteristics will endure and worsen unless a greater amount of new housing is provided in addition to the existing allocated site.</p> <p>Moreover, whilst the delineation of Settlement Boundaries has been considered in the process of preparing the Local Plan Review, an objective examination of that drawn at Mortimer illustrates it is drawn tightly around the existing built-up area of the settlement. Consequently, there are no genuine opportunities for windfall development.</p> <p>For these reasons, we consider the Local Plan should increase the amount of housing to be provided at Mortimer. This would be consistent with paragraph 66 of the NPPF.</p> <p>In this context, our representations consider the following matters:</p> <ul style="list-style-type: none"> - Chapter 4 The Development Strategy and the role of Mortimer in the east of the District - Chapter 6 Delivering Housing and the approach to Mortimer - The suitability of land at Kiln Lane, Mortimer <p>The Development Strategy</p> <p>Consistent with the current Local Plan, the Development Strategy retains its Spatial Areas: (1) Newbury and Thatcham, (2) the Eastern Area and (3) the North Wessex Downs Area of Outstanding Natural Beauty.</p> <p>We agree, as a matter of principle, that Newbury and Thatcham, as the main settlements in the District, should be a focus for new development. We similarly agree that, because of its valued landscape characteristics, only a modest amount of development should be directed to the AONB.</p> <p>However, we consider that insufficient regard has been had to the role of the Eastern Area and its ability to accommodate new housing. Policy SP14 indicates that Theale is the only Rural Service Centre in the Eastern Area where new housing allocations are proposed (i.e., in addition to existing those identified in the Site Allocation DPD). As such, the suitability of other settlements, particularly Mortimer, is overlooked.</p> <p>Mortimer is a Rural Service Centre. This is a group of settlements with a good range of key services and opportunities for employment, community and education. They serve a wide catchment area and contain reasonable accessibility and regular public transport to a number of destinations (Table 1 of the consultation document refers).</p> <p>Paragraph 4.32 of the consultation document refers to these settlements in the following terms: "...the six rural service centres across the District provide a focal point for the surrounding villages and rural areas in terms of the provision of services and facilities. Although they do not have as wide a range of services as the urban areas, they are still sustainable locations."</p> <p>The Settlement Audit (Appendix 3) indicates the relative advantages of Mortimer in comparison with other locations generally in the rural parts of the District. Mortimer's scoring is comparable to other settlements where new housing allocations are proposed.</p> <p>It is instructive to consider how the Neighbourhood Plan describes Mortimer. <i>Rail and road links mean that people naturally look to Reading and then Newbury or Basingstoke for employment and town-based facilities. Mortimer has a railway station on the Reading to Basingstoke line but it is about 1.5 miles from the centre of the village. The centre of the village is now in what was Mortimer Common, with Post Office, bank, shops, St. John's Infant School, village hall, and churches all close together. St. Mary's Junior School is located over a mile from the centre of the village, nearer the station. For secondary schooling, students usually attend Willink School in the neighbouring parish of Burghfield. Because Mortimer has a long history and an increasing population it has managed to retain most of its traditional facilities and</i></p>

to develop some new ones. As such it continues to act as a small rural centre for itself and other villages nearby. The age structure of the parish is slightly older than the average for West Berkshire and there are fewer persons in the 13 to 30 year age groups than on average in West Berkshire. However, there are slightly more children below the age of 13 than the average for the wider area. Of particular note is the age band of 25 to 30 where Stratfield Mortimer has only some 62% of the wider average. (Emphasis added)

Identified “weaknesses” in the Parish are accelerating housing cost, lack of affordable housing to buy and lack of affordable housing to rent.

In these terms, Mortimer is a suitable location for new housing when viewed in the context of advice in the NPPF: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs; and To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”* (§78 and §79 refers)

Yet the consultation document does not intend that any additional housing is provided at Mortimer to that already allocated in 2017.

Paragraph 6.36 of the consultation document sets out the position for Mortimer as follows: *“110 dwellings are already allocated up to 2026 in the Stratfield Mortimer Neighbourhood Plan. The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Given the outstanding dwellings still to deliver, no additional allocations in the plan period are proposed.”*

Table 2 of the consultation document indicates that of the 110 dwellings allocated for development up to 2026, only 28 have been built with a remaining 82 as at 31st March 2022. The rationale set out in paragraph 6.36 lacks logic as it dilutes the contribution it makes to new housing and in effect constrains the growth of the settlement, despite its status and suitability as a Rural Service Centre.

In effect it is simply reducing what was to be 110 houses built between 2017 and 2026 to 110 houses built between 2017 and 2039; in effect halving the amount of housing relative to the overall period of time. In the face of the characteristics of Mortimer, described by the Neighbourhood Plan, this is illogical.

In this context is instructive to consider the Housing Background Paper which reveals that housing completions from The Street are expected to be achieved by 2026. The effect of this is that for the remaining 13 years of the plan period, there would be no new planned housing at Mortimer despite its role and status in the Local Plan.

Accordingly, contrary to the established tests of soundness, in this respect, the Local Plan is not “positively prepared”.

Moreover, in the east of the District, these settlements are in close proximity to the District’s administrative boundary, and consequently related to a greater extent than other settlements to the major urban area of Reading. Reading is a sub-regionally important settlement with exceptional linkages to London which have been enhanced by the recent opening of Cross Rail.

Successive assessments of how Reading is expected to meet its future development requirements have confirmed the likelihood of unmet need arising. In this regard, a new settlement concept at Grazeley, south of the M4, partly within West Berkshire and partly within Wokingham was considered as an option, although later the restrictions associated with the Atomic Weapon Establishment precluded this.

The locational attributes of a new settlement at Grazeley are of course shared by those existing settlements in close proximity to it, including Mortimer which is well related to the existing railway station. In these terms, those settlements could contribute to meeting future development needs with the benefit of accessibility to Reading.

Importantly, Mortimer is not constrained by the Emergency Planning Zone (DEPZ), shown at Appendix 3 of the consultation document, which covers a significant part of this spatial area.

For all these reasons, and in the context of the need for additional housing land, discussed in the following section, Mortimer represents an eminently suitable settlement for additional housing.

4 The suitability of land at Kiln Lane, Mortimer

Located to the east of Kiln Lane and west of The Avenue, the land which Hallam control measures 7 hectares in size, and is comprised of a horse paddock and a single arable field.

Via The Street and the existing Public Rights of Way network, the Site is well located to existing facilities within the village centre (within 800m - 10 mins), whilst to the east is the Primary School and Mortimer train station, providing strong links to Reading and Basingstoke.

The Site could accommodate some 75 new homes which is consistent with the scale and role and function of a rural service centre. In addition, there is potential for elderly persons accommodation and the provision of a new early years facility, which reflects identified needs in the Neighbourhood Plan. Alongside new development would be accessible green space, potentially comprising children’s / teenage play space, and allotment provision. These community facilities seek to compliment existing green spaces within the village.

Future development has the potential to establish an effective transitional edge to the east of Mortimer, to slow traffic speeds along The Street and to maintain an attractive gateway or sense of arrival to the village.

5 Summary

This response to the West Berkshire Local Plan 2022-2039 has been prepared on behalf of Hallam Land Management Limited.

We have identified that, irrespective of the current consultation relating to the NPPF, it is firmly the case that Local Plans should continue to provide a sufficient supply of housing land to meet identified needs.

	<p>In this regard, we agree with the Council that there is no basis to reduce the number of new homes that is planned for on the basis of the Government's Standard Method. In fact, because of the inevitable situation where unmet need will arise from Reading, the higher end of the range is still too low and should be increased.</p> <p>Turning to spatial strategy and the distribution of new housing, to manage the pattern of growth and achieve the most sustainable pattern of development, an additional amount of housing should be provided in the Eastern Spatial Area. For the reasons set out herein, Mortimer is an eminently suitable location categorised as a Rural Service Centre and outside the Emergency Planning Zone which constrains other locations. It is not within the Area of Outstanding Natural Beauty which is subject to a high level of protection.</p> <p>The notion of no additional housing at Mortimer to that allocated in 2017 and to be developed by 2026, fails to consider longer term needs to the end of this current plan period. In these terms, the Local Plan is not positively prepared.</p> <p>Located to the east of the Kiln Lane and west of The Avenue, the land which Hallam control measures 7 hectares in size, and is comprised of a horse paddock and a single arable field. The Site could accommodate some 75 new homes which is consistent with the scale and role and function of a rural service centre. In addition, there is potential for elderly persons accommodation and the provision of a new early years facility, which reflects identified needs in the Neighbourhood Plan. Alongside new development would be accessible green space, potentially comprising children's / teenage play space, and allotment provision. These community facilities seek to compliment existing green spaces within the village.</p> <p>Accordingly, the Local Plan should either allocate land at Kiln Lane or set out an additional amount of housing to be provided by additional allocations in a new Stratfield-Mortimer Neighbourhood Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The Local Plan should increase the housing requirement at Mortimer either by the allocation of land at Kiln Lane or by directing the Neighbourhood Plan to allocate additional land to that currently allocated.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain the matters raised in the attached representation.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Darcliffe Homes Limited (Represented by Boyer Planning)</p>
<p>Consultee Full Name</p>	<p>Darcliffe Homes Limited</p>
<p>Consultee Organisation</p>	<p>Darcliffe Homes Limited</p>
<p>Agent Full Name</p>	<p>Mr Joe Hickling</p>
<p>Agent Organisation</p>	<p>Boyer Planning Ltd</p>

Comment ID	PS1725
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	Boyer (Darcliffe) (Little Heath rd) full rep.pdf Boyer (Darcliffe) (Sullham hill) full rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Omission Sites: To assist in resolving our concerns, Darcliffe are promoting the allocation of: <ul style="list-style-type: none"> • Land West of Little Heath Road, Reading ('The site') • Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A'), for approximately 30

- Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B'), for approximately 49 homes.

Land West of Little Heath Road, Reading

LAND WEST OF LITTLE HEATH ROAD, TILEHURST

The Opportunity

The site comprises approximately 13.5ha of land providing the opportunity to deliver approximately 322 much needed new homes. A Site Location Plan is provided at **Appendix 1** [see attachment 'PS1747 Boyer (Darcliffe Homes) Full LPR Rep].

Development of the site will provide a mix of housing in line with national and local policy. A range of house types, sizes and tenures are envisaged in order to maximise the effective and efficient use of the site and to meet the accommodation needs of a variety of household types.

The site has not previously been promoted in the current LPR and therefore does not feature in the 2023 HELAA. However, the site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built-up area of Tilehurst, up to Sulham Woods.

A detailed assessment of the site's deliverability is set out in **Appendix 2** [see attachment 'PS1747 Boyer (Darcliffe Homes) Full LPR Rep]. However, to summarise, the site itself is largely unconstrained and forms mostly developable land. Vehicular access points are available multiple locations along Little Heath Road. Furthermore, there is ample space to mitigate impacts and work around the Tree Preservations Orders ('TPO's'), Root Protection Areas ('RPA's'), Ancient Woodland and Local Wildlife Areas to the west of the site, through the means of green and blue infrastructure.

The main constraint to overcome would be the impacts on the North Wessex Downs AONB and local landscape sensitivity. **Appendix 2** provides a detailed assessment of the site's suitability in relation to the AONB.

Darcliffe is acting as agent for the Sulham Estate whilst an imminent option agreement between the two parties is agreed. Darcliffe and the Sulham Estate have a proven record of promoting land in Tilehurst as exemplified by Stonehams Farm (refs. EUA003 and EUA008) allocation in the HSA DPD (2017).

Furthermore, there are no known legal restrictions to the development of the site for the proposed use. The site is therefore considered to be available for residential development within the plan period (within the next 1 – 5 years), in accordance with PPG.

SUSTAINABILITY APPRAISAL (SA) / STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The Council's Sustainability Appraisal ('SA') / Strategic Environmental Assessment ('SEA') [Footnote 16: Available online at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>.] forms a core part of the evidence base underpinning the Local Plan.

The LPR has identified a number of new residential site options following the Housing and Economic Land Availability Assessment ('HELAA'), which rejected a number of sites that the council deems to be unsuitable based on the available evidence at the time.

At Appendix 8b, the Council's SA/SEA makes an assessment of each of the new residential site options which are identified not to be unsuitable.

Given that Land west of Little Heath Road was not assessed in the HELAA and therefore not the SA/SEA either, the assessment is replicated (below) at Table 1, where an equivalent assessment is made by Darcliffe Homes.

The scoring system also replicates that used in the SA/SEA, as follows:

[see pages 24-28 of attachment 'PS1747 Boyer (Darcliffe Homes) Full LPR Rep']

To summarise, the development site would likely have an overall neutral to positive impact on sustainability. Positive impacts have been identified in relation to all types of sustainability. Social sustainability as the site seeks to set out the requirements for a ranging typology of new houses on the site (of which 40% would be affordable), as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as a potential policy would set out the measures required to protect and enhance biodiversity and provide development that is conscious of climate change impacts. Economic sustainability would benefit from new development in a sustainable location where there is good access to services and facilities including employment opportunities. No negative sustainability impacts have been identified.

Policy SP15: Sites allocated for residential development in North Wessex Downs AONB [it should be noted that the site falls within the Eastern Area and not the AONB Spatial Area. It is for this reason that the comments below have been included here]

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

Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A')

Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A') comprises approximately 1.3 hectares of land adjoining the western extent of Tilehurst, which comprises a suburb of Reading's western extent. The site adjacent to Sulham Hill, forming a vacant field between the road and the existing community that comprises the suburb of Tilehurst.

The site currently comprises an undeveloped agricultural field, which is bordered by established woodland to the north, south and west. Beyond the well-vegetated site boundaries to the north, south, and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.

The site was submitted to the Council as part of a Call for Sites exercise, which took place between 2012 - 2013. The site was assessed in the 2013 Strategic Housing Land Availability Assessment ('SHLAA')

(site ref: EUA033) as 'potentially developable'. The Council's Housing and Economic Land Availability Assessment ('HELAA'), which succeeded the SLAA and was updated most recently in January 2023, concluded that the site was *potentially available*, but *unsuitable* for residential development within the proposed emerging plan period, largely due to access and landscape considerations.

Darcliffe confirms that the site is immediately *available* for development, is *suitable* for residential development, and is *achievable* with a realistic prospect that development would be delivered on the site within the proposed emerging plan period.

Consequently, Darcliffe contend that the site is deliverable in relation to the provisions set out in Planning Practice Guidance [Footnote 1: PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3-018- 20190722]. Further detail is provided in Sections 5 and 6 of these representations in relation to the *availability*, *suitability*, and *achievability* of Site A for residential development.

Sections 5 and 6 of these representations demonstrate that the site benefits from being very sustainably located and there are no significant constraints to the development of the site for residential dwellings within the emerging plan period. The development of the site is considered to be achievable whilst conserving and enhancing the special qualities of the AONB, in accordance with proposed Policy SP2: North Wessex Downs AONB.

The development of the site for approximately 30 new homes would contribute toward meeting the district's significant identified housing need in a highly sustainable location, in addition to providing a range of further benefits; including much-needed affordable housing, biodiversity improvements, contributing to meeting Reading's unmet need, the provision of public open space, and financial contributions toward the maintenance of local infrastructure.

Development at this scale is considered to represent an efficient use of the land, whilst respecting the character and setting of the wider landscape in which the site is set. As such, allocation of the site for approximately 30 dwellings would accord with Paragraph 124 of the NPPF, in which it is made clear that 'planning policies and decisions should support development that makes efficient use of land'.

Consequently, Darcliffe encourage the Council to reconsider the omission of the site for residential development and include an allocation of the site for the development of approximately 30 dwellings within the emerging local plan.

The Opportunity

The site comprises approximately 1.3ha of land providing the opportunity to deliver approximately 30 much needed new homes. A Site Location Plan is provided at **Appendix 1** [see attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'].

Development of the site will provide a mix of housing in line with national and local policy. A range of house types, sizes and tenures are envisaged in order to maximise the effective and efficient use of the site and to meet the accommodation needs of a variety of household types.

The site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built up area of Tilehurst, up to Sulham Woods.

A detailed assessment of the site's deliverability is set out in **Appendix 2** [see attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'], however to summarise, the site itself is mostly unconstrained and forms mostly developable land. Vehicular access points are available at multiple locations along Long Lane. Furthermore, there is ample space to mitigate impacts and work around the Tree Preservations Orders ('TPO's'), Root Protection Areas ('RPA's'), Ancient Woodland and Local Wildlife Area to the west of the site, through the means of green and blue infrastructure.

The 2023 HELAA under ref. TIL14, however, identified the site 'not to be developable within the next 15 years' owing to concerns surrounding impacts on highways, the North Wessex Downs AONB and local landscape sensitivity. **Appendix 2** forms a detailed assessment of the sites suitability in relation to these matters, drawing upon evidence set out in technical reports. **Appendix 4 - Transport and Access Appraisal Report** [see attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'], directly addresses the HELAA highways concerns.

The site is in the control of Darcliffe and, if allocated, is envisaged would be capable of delivering sustainable development within the first 5-years of the LPR's plan period.

SUSTAINABILITY APPRAISAL (SA) / STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The Sustainability Appraisal ('SA') / Strategic Environmental Assessment ('SEA') forms a core part of the evidence base underpinning the Local Plan.

The LPR has identified a number of new residential site options following the Housing and Economic Land Availability Assessment ('HELAA') which rejects a number of sites that the council deems to be unsuitable based on the available evidence.

At Appendix 8b, the SA/SEA makes an assessment of each of the new residential site options which are not deemed to be unsuitable.

Site A (HELAA Ref. TIL 14) was assessed in the HELAA as '*not be developable within the next 15 years*' and therefore not assessed in the SA/SEA. However, as set out in section 5, technical work has been undertaken to demonstrate how the concerns raised in the HELAA can be overcome.

As such, the SA/SEA assessment is replicated (below) at Table 1, which is accompanied by an equivalent assessment made by Darcliffe alongside summarised commentary.

The scoring system also replicates that used in the SA/SEA, as follows [see pages 18 to 23 of attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'].

To summarise, the development site would likely have an overall neutral to positive impact on sustainability. Positive impacts have been identified in relation to all types of sustainability. Social sustainability as the site seeks to set out the requirements for a ranging typology of new houses on the site (of which 40%

would be affordable), as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as a potential policy would set out the measures required to protect and enhance biodiversity and provide development that is conscious of climate change impacts. Economic sustainability would benefit from new development in a sustainable location where there is good access to services and facilities including employment. No negative sustainability impacts have been identified.

Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B')

Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B') comprises approximately 2.2 hectares of land adjoining the western extent of Tilehurst, which comprises a suburb of Reading's western extent. The site adjacent to Sulham Hill, forming a vacant field between the road and the existing community that comprises the suburb of Tilehurst.

The site currently comprises an undeveloped agricultural field, which is bordered by established woodland to the north, south and west. Beyond the well-vegetated site boundaries to the north, south, and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.

The site was submitted to the Council as part of a Call for Sites exercise, which took place between 2012 - 2013. The site was assessed in the 2013 Strategic Housing Land Availability Assessment ('SHLAA') (site ref: EUA032) as 'potentially developable'. The Council's Housing and Economic Land Availability Assessment ('HELAA'), which succeeded the SLAA and was updated most recently in January 2023, concluded that the site was *potentially available*, but *unsuitable* for residential development within the proposed emerging plan period, largely due to access and landscape considerations.

Darcliffe confirms that the site is immediately available for development, is *suitable* for residential development, and is achievable with a realistic prospect that development would be delivered on the site within the proposed emerging plan period.

Consequently, Darcliffe contend that the site is deliverable in relation to the provisions set out in Planning Practice Guidance [Footnote 2: PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3-018- 20190722]. Further detail is provided in Sections 5 and 6 of these representations in relation to the *availability*, *suitability*, and *achievability* of Site B for residential development.

Sections 5 and 6 of these representations demonstrate that the site benefits from being very sustainably located and there are no significant constraints to the development of the site for residential dwellings within the emerging plan period. The development of the site is considered to be achievable whilst conserving and enhancing the special qualities of the AONB, in accordance with proposed Policy SP2: North Wessex Downs AONB.

The development of the site for approximately 30 new homes would contribute toward meeting the district's significant identified housing need in a highly sustainable location, in addition to providing a range of further benefits; including much-needed affordable housing, biodiversity improvements, contributing to meeting Reading's unmet need, the provision of public open space, and financial contributions toward the maintenance of local infrastructure.

Development at this scale is considered to represent an efficient use of the land, whilst respecting the character and setting of the wider landscape in which the site is. As such, allocation of the site for approximately 30 dwellings would accord with Paragraph 124 of the NPPF, in which it is made clear that 'planning policies and decisions should support development that makes efficient use of land'.

Consequently, Darcliffe encourage the Council to reconsider the omission of the site for residential development and include an allocation of the site for the development of approximately 30 dwellings within the emerging local plan.

The Opportunity

The site comprises approximately 2.2ha of land providing the opportunity to deliver approximately 49 much needed new homes. A Site Location Plan is provided at Appendix 1 [see attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'].

Development of the site will provide a mix of housing in line with national and local policy. A range of house types, sizes and tenures are envisaged in order to maximise the effective and efficient use of the site and to meet the accommodation needs of a variety of household types.

The site is sustainably located in terms of access to local facilities, amenities and public transportation links to the centre of Reading. The site would also represent a logical extension to the western boundary of the built up area of Tilehurst, up to Sulham Woods.

A detailed assessment of the site's deliverability is set out in **Appendix 3** [see attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'], however to summarise, the site itself is mostly unconstrained and forms mostly developable land. Vehicular access points are available at multiple locations along Long Lane. Furthermore, there is ample space to mitigate impacts and work around the TPO's, RPA's, Ancient Woodland and Local Wildlife Area to the north, west and south of the site, through the means of green and blue infrastructure.

The 2023 HELAA under ref. TIL15, however, identified the site 'not to be developable within the next 15 years' owing to concerns surrounding impacts on the North Wessex Downs AONB and local landscape sensitivity. **Appendix 2** forms a detailed assessment of the sites suitability in relation to these matters, drawing upon evidence set out in technical reports. **Appendix 5 - Transport and Access Appraisal Report** [see attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'], directly addresses the HELAA's highway concerns.

The site is in the control of Darcliffe and, if allocated, is envisaged would be capable of delivering sustainable development within the first 5-years of the LPR's plan period.

SUSTAINABILITY APPRAISAL (SA) / STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

	<p>The Sustainability Appraisal ('SA') / Strategic Environmental Assessment ('SEA') forms a core part of the evidence base underpinning the Local Plan.</p> <p>The LPR has identified a number of new residential site options following the Housing and Economic Land Availability Assessment ('HELAA') which rejects a number of sites that the council deems to be unsuitable based on the available evidence.</p> <p>At Appendix 8b, the SA/SEA makes an assessment of each of the new residential site options which are not deemed to be unsuitable.</p> <p>Site A (HELAA Ref. TIL 15) was assessed in the HELAA as '<i>not be developable within the next 15 years</i>' and therefore not assessed in the SA/SEA. However, as set out in section 7 and Appendix 3, technical work has been undertaken to demonstrate how the concerns raised in the HELAA can be overcome.</p> <p>As such, the SA/SEA assessment is replicated (below) at Table 1, which is accompanied by an equivalent assessment made by Darcliffe alongside summarised commentary.</p> <p>The scoring system also replicates that used in the SA/SEA, as follows [see attachment 'PS1725 Boyer (Darcliffe Homes) Full LPR Rep'].</p> <p>To summarise, the development site would likely have an overall neutral to positive impact on sustainability. Positive impacts have been identified in relation to all types of sustainability. Social sustainability as the site seeks to set out the requirements for a ranging typology of new houses on the site (of which 40% would be affordable), as well as requirements for good access routes to local services and facilities. Impacts on environmental sustainability are likely to be positive as a potential policy would set out the measures required to protect and enhance biodiversity and provide development that is conscious of climate change impacts. Economic sustainability would benefit from new development in a sustainable location where there is good access to services and facilities including employment</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pincent Lane (Represented by TOWN)
<p>Consultee Full Name</p>	Pincent Lane
<p>Consultee Organisation</p>	Pincent Lane

Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1358
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincents Lane) Full Rep.pdf TOWN (Pincents Lane) App 5 19_00113 Com rep.pdf TOWN (Pincents Lane) App 1. Land ownership plan.pdf TOWN (Pincents Lane) App 2 TIL13 Planning History.pdf TOWN (Pincents Lane) App 3 Pincents Hill SoCG.pdf TOWN (Pincents Lane) App 4 Illustrative Masterplan.pdf TOWN (Pincents Lane) App 6 Site in LPR.pdf TOWN (Pincents Lane) App 10 Masterplan Vision.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	No

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The availability of sites for housing and other development in the Eastern Area is restricted by constraints including the safeguarding zones for the Atomic Weapons Establishments at Aldermaston and Burghfield. Some of these sites are – in part or in full – on land in Flood Zones Two and Three. We object to the allocation of site RSA11, the former sewage treatment works at Theale, since it is in a zone of higher flood risk than TIL13.</p> <p>These and similar factors were recognised by WBC in the previous adopted Core Strategy Policy ADP4, which established a ‘Broad Location for Development’ within which to find sites for the housing required. The Land at Pincents Lane falls squarely within this Broad Location.</p> <p>Policy SP14 suggests that “<i>The Tilehurst Neighbourhood Plan will not include allocations for residential development, and will instead only include development management policies.</i>” No additional sites are proposed for allocation in Tilehurst as a result. However, it should be pointed out that this policy of not allocating sites for development in the Tilehurst Neighbourhood Plan has yet to be tested at its own Examination. It is contrary to the advice at paragraph 66 of the NPPF that:</p> <p><i>“... strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations...”</i></p> <p>Policy SP14 therefore fails to make appropriate provision for the scale of need in the Eastern Area and the fact that many sites will be inherently more sustainable due to their proximity to the dominant urban area of Reading. It also fails to provide for any of Reading’s unmet needs. As such it is inconsistent with NPPF 11 a&b.</p> <p>Omission Site - Pincents Lane</p> <p>Attachments: Pincents Lane additional Information</p> <ul style="list-style-type: none"> • Appendix 1 - Site Location Plan • Appendix 2 - Planning History • Appendix 3 - SoCG 2016 • Appendix 4 - 165 unit illustrative Masterplan • Appendix 5 - Committee Report 19/00113/OUTMAJ • Appendix 6 - References to the site in LPR • Appendix 10 - Node: draft Masterplan
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The requirement to allocate more sites in the Eastern Area would address many of these challenges to soundness. Whilst it is acknowledged that some constraints do exist, there are sites which are recognised as achievable and deliverable in the Council’s evidence base supporting the LPR. Prime amongst these is site TIL13 at Pincents Lane (see overleaf). Site TIL13 has a long planning history. By common consent, the problems with the 2011 appeal scheme have been resolved and no technical obstacles exist to development of the site for a scheme of up to 165 dwellings. By the LPA’s own assessment, the concerns – and the reasons for not proposing it for allocation – are entirely “political”. No one would deny the validity of elected members making political choices where real choices exist, but the fact is that not allocating the site would leave the LPA without a single significant contribution to offer to meet either its own housing need in the Eastern Area or that arising from Reading, of which the Area is functionally part. The site should therefore be allocated.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst Parish Council
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1733
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>HELAA Appendix 4 - It is not clear where or how the figure of 138 dwellings has been generated. The developer has submitted multiple unsuccessful planning applications over many years, the latest being for 265 dwellings, revised to 165. This was refused at committee in April 2022 and the decision was not appealed. It is noted that Stage 2a Development Potential states "Up to 138 dwellings but known issues exist which are likely to decrease this number". This statement has not been carried into Appendix 8b (below). Additional important details that contribute to rejection of this site from the Plan have also not been transferred to the SA/SEA. Some examples are detailed below.</p> <p>Local Green Space Designation (Stage 2b Suitability): it should be noted that part of the land has been identified as being suitable for LGS designation in the Tilehurst NDP which recently completed Regulation 14 Consultation.</p> <p>TIL19 *New Site* Calcot Park Golf Club, Calcot, Reading.</p> <p>This site has been added to the HELAA site assessment. Tilehurst Parish Council has no record of being consulted on the inclusion.</p> <p>The site is inside the settlement boundary so it is not clear why it is assessed here. Its inclusion is making an already complex Planning Process even more incomprehensible and concerning to local residents, particularly when they see references to potential development of 130 houses or up to 335 flats. The "Availability" determination for this site has multiple "unknowns"- legal issues, timeframe for bringing forward for development, potential timeframe for development, and whether a developer/housebuilder is involved. Since the site promoter has been sufficiently involved to indicate a number of dwellings it seems odd none of these other factors are known yet.</p> <p>For clarity it should be noted again that the Local Plan Review clearly defines how expected housing need will be met through strategic site allocations outside the settlement boundary, allocations from named NDPs and small scale (less than 10 units) windfall inside the settlement boundary. Windfall development on this scale within the settlement boundary will not be required to meet the anticipated need.</p> <p>Appendix 8b – SA/SEA of New Residential Site Allocation Options</p> <p>TIL14 Pincents Lane, Tilehurst.</p> <p>P.31 States "Parish/Town Council: No comments"</p> <p>This council is not aware of any request for comment on this document or the revised HELAA.</p> <p>Whilst this Council agrees with the decision not to include this site in the updated Plan, it feels the sound planning reasons behind this decision are not adequately explained in this document.</p> <p>Numerous important points from the updated HELAA site assessments have been poorly summarized or omitted altogether from the summary tables.</p> <p>For example, under "Air Quality, Pollution & Contamination" (Stage 2b Suitability) the HELAA Site Assessment states-</p> <p>"The site is close to the M4 and A4.</p> <p>Significant worsening of nitrogen dioxide and particulate matter. Medium risk of contamination.</p> <p>Medium risk to future occupants from nearby commercial uses. Medium risk to neighbours"</p> <p>Yet in the summary table of this document, it merely states "The site is unlikely to impact on air quality". The HELAA wording is relegated to a footnote and does not seem to have been taken into account in the summary.</p> <p>The HELAA Site Assessment notes- "The site will generate circa 828 vehicle movements per day with circa 83 during peak hours. There is much concern regarding the impact along Pincents Lane and along the A4."</p> <p>No reference is made to this in the summary table of this document under "To promote and maximise opportunities for all forms of safe and sustainable transport", except to note "Locally there are significantly concerns regarding access to the site." It is not clear why this text is under the heading "mitigation/enhancement".</p> <p>It is concerning to local residents familiar with the history of this site to see the words "At the time planning permission is sought for development at this site...". This implies a planning application is expected</p>

	despite the numerous failed previous attempts and this site's rejection as not developable in the proposed Local Plan Review.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1530
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Croudace Homes Combined Appendices.pdf Representations on behalf of Croudace Homes.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>[See attached Combined Appendices for appendices. For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>Local Plan Review Allocations</p> <p>The Council proposes to allocate the sites listed at Table 7 for residential development. Croudace's analysis of the proposed allocations and their ability to deliver completions is summarised alongside each relevant allocation, with further analysis contained within the subsequent paragraphs.</p> <p>Proposed New Allocations</p> <p>The LPR proposes to allocate nine new sites for residential development to bring forward an estimated 1,720 units. It also delegates the allocation of land for 80 units upon adoption of two respective Neighbourhood Plans.</p> <p>Other New Allocations (Draft Policies SP13, SP14 and SP15)</p> <p>Croudace notes that draft allocations are proposed in each spatial area. However, some of these sites are subject to constraints which should see them removed from the LPR as their development is likely to be impeded.</p> <p>For example, the following sites are within the River Lambourn Special Area of Conservation ('SAC') – an area constrained by issues surrounding nutrient neutrality as marked on the draft Policies Map:</p> <ul style="list-style-type: none"> – RSA17: Land at Chieveley Glebe (15 units); – RSA19: Land West of Spring Meadows, Great Shefford (15 units); – RSA22: Land Adjacent Station Road, Hermitage (34 units). <p>In addition, 25 units are proposed to be delegated by the LPR to come forward via a Neighbourhood Plan at Lambourn; a Neighbourhood Area highly constrained by nutrient neutrality issues.</p> <p>As explained by Natural England, "nutrient neutrality is a means of ensuring that a development plan or project does not add to existing nutrient burdens within catchments, so there is no net increase in nutrients as a result of the plan or project".</p>

	<p>Planning applications submitted in areas affected by nutrient neutrality must be accompanied by a Habitat Regulations Assessment ('HRA') which demonstrates that there is no effect on the level of nutrients within watercourses. Where there is a negative effect on nutrient levels, mitigation strategies must be secured.</p> <p>It is our understanding that mitigation strategies (likely to be in the form of a scheme enabling developers to purchase 'nutrient credits') are not currently well advanced, and until they are, it is the case that development in affected areas is effectively 'on-hold' unless nutrient neutrality can be demonstrated.</p> <p>Croudace does not consider the proposed allocation of sites in areas which are so heavily constrained by an issue which is unlikely to be resolved in the short term to be a 'justified' or 'effective' strategy. Nutrient neutrality is a complex matter, and a resolution is likely to mean that development in nutrient neutrality zones is impeded for long enough to delay delivery of housing beyond a five year period.</p> <p>On that basis, Croudace considers that the Council should remove draft allocations RSA17, RSA19 and RSA22 and the reliance on the Lambourn Neighbourhood Plan. The effect of this would be to reduce the claimed supply by 89 units.</p> <p>Part of this shortfall could be made up by proposing alternative allocations on unconstrained sites, such as Henwick Park, which is not impacted by nutrient neutrality issues.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1590
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	

Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 16:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	*Late Response* Page 112 This site allocation conflicts with SP4 as there is little likely hood that it will receive planning permission due to the DEPZ location? Should it not be removed as undeliverable?
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS835
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	No

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP14 – SITES FOR EASTERN AREA</p> <p>No comment.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

<p>publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1747
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	Boyer (Darcliffe) (Sullham hill) full rep.pdf Boyer (Darcliffe) (Little Heath rd) full rep.pdf
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	Yes
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable</p>	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Development Management Policies</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Where possible, suggested amendments have been set out in the response.</p> <p>Darcliffe broadly supports the objectives of the West Berkshire Local Plan Review (2022 - 2039) but advises that the Council reconsider the omission of an allocation for residential development at Land west of Little Heath Road, Reading, for approximately 322 dwellings, to ensure that the plan can be found sound at the Examination in Public.</p> <p>The comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies. Darcliffe's overriding recommendation comprises the inclusion of a new site allocation for approximately 322 additional dwellings at the Land west of Little Heath Road, Reading. The various benefits of including such an allocation are set out in sections 6, 7 and Appendix 2 of these representations.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Darcliffe recommends the inclusion of site allocations for residential development at 'Land to the east of Long Lane & south Blackthorn Close, Tilehurst', and 'Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst', under new policies 'RSA24' and 'RSA25'.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>i) Development in the North Wessex Downs <u>AONB</u> is will be allocated for the approximate number of <u>homes</u> as follows: [...]</p> <p>Furthermore, Darcliffe recommends the inclusion of an allocation for residential development at Land west of Little Heath Road, Reading, under a new policy 'RSA24'.</p> <p>Darcliffe recommends the inclusion of site allocations for residential development at 'Land to the east of Long Lane & south Blackthorn Close, Tilehurst', and 'Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst', under new policies 'RSA24' and 'RSA25'.</p> <p><for table see attachments></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land west of Little Heath Road, Reading). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1777
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	Englefield Estate cover letter REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>LPR paragraph 6.23 identifies a need for an additional 1,809 dwellings to 2039, taking into account existing commitments for 7,337 dwellings. Notably the existing commitments includes 1,580 dwellings at Sandford Park, which was allocated in 2012 and has only recently been granted planning permission, and a large proportion (1,949 dwellings) at windfall sites which do not have planning permission, and so it is questionable whether all of the existing commitments will be delivered during the LPR plan period. It is therefore considered that an additional supply of housing is likely to be required in the LPR, above the stated requirement of 1,809 dwellings, which could be met through smaller sites distributed throughout the District to avoid similar delays to that experienced at Sandford Park. It is important that the LPR identifies a sufficient supply of deliverable sites to meet the local housing target, taking into the previous shortfall in delivery and the potential that identified sites do not come forward as envisaged.</p> <p>It is noted that draft LPR Policies SP13-SP15 make provision for 1,720 new dwellings (as referred to at paragraph 6.24), with 80 dwellings proposed to be allocated at neighbourhood plans (as referred to at paragraph 6.25), below the stated outstanding requirement for 1,809 dwellings. It is therefore crucial that additional housing sites are identified in order to meet the LPR housing target (with a need for more housing sites to be identified given the comments raised above regarding the existing commitments).</p> <p>The NPPF also emphasises that small and medium sites 'can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly' (paragraph 68). Indeed the Estate's landholdings across the eastern part of the District include a number of small and medium land parcels (as noted further below) which are suitable to accommodate sustainable development and contribute to the District's housing land supply. This includes the Estate's land at Burghfield Common, Theale and Mortimer as noted further below. A number of these sites are currently located within the DEPZ, however should this change during the plan period (as noted above) and additional housing be required, these sites are well placed to accommodate this need.</p> <p>Development Opportunities</p> <p>Burghfield Common</p> <p>The Estate's landholdings at Burghfield Common include land adjacent to Pondhouse Farm (ref. BUR10) and land at Hollybush Lane, Burghfield Common (ref. SUR3). Taking into account the role of Burghfield Common within the District, and given that the DEPZ may be subject to change (as noted above), it is recommended that some provision is made for additional housing at Burghfield in order to ensure certainty of future housing supply.</p> <p>The site adjacent to Pondhouse Farm (ref. BUR10) adjoins the eastern edge of Burghfield Common and is within walking distance of all the services and facilities within the village (including educational, retail and community facilities). The site is currently in agricultural use and is not constrained environmentally e.g. by ecological or landscape designations, or by flood risk considerations. The site is therefore situated in a sustainable location to accommodate development in the region of 100-140 dwellings.</p> <p>The site at Hollybush Lane (ref. SUR3) adjoins the northern edge of the Burghfield Common settlement boundary. The site is a c10 minute walk to educational, retail and community facilities and 1 mile away from the village centre. The site is recognised as having opportunities for biodiversity enhancements through its designation as a 'Biodiversity Opportunity Area', however in all other respects, the site is not constrained environmentally e.g. by landscape designations or flood risk considerations. The site, or part thereof, is therefore situated in a sustainable location to accommodate development.</p> <p>Mortimer</p> <p>In addition to land at West End Road (ref. SM2) and The Street (ref. SM3) (promoted by others), the Estate has landholdings at Spring Lane (ref. SM4) and Monkton Copse, Mortimer (ref. SM5). As explained further above, Mortimer is located just outside the DEPZ in the Eastern Area and has potential to accommodate additional development within the LPR plan period to 2039 (beyond the existing Neighbourhood Plan period).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes

Please give reasons for your answer	
4. Proposed Changes	Policy SP13-15 and the supporting text as currently worded do not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, in order to ensure the soundness of the Plan, additional housing sites should be identified to ensure that local housing needs are met. This should include consideration of small and medium sites at Burghfield Common, Theale and Mortimer.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Charlesgate Homes Limited
Consultee Full Name	Mr Joe Atkinson
Consultee Organisation	Charlesgate Homes Limited
Agent Full Name	
Agent Organisation	
Comment ID	PS1643
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:28:00
Attached Files	Charlesgate Homes response to AWE depz zone.pdf Charlesgate Homes_HSA site assessment SUL1_attachment.pdf Charlesgate Homes_site promotion masterplan for SUL1.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>SP14 Sites allocated for residential development in the Eastern Area</p> <p>This policy highlights where West Berkshire council are proposing to allocate the housing requirements in the Eastern area.</p> <p>It is proposed that up to 386 houses will come forward on new allocated sites, a 65 bedroom care home and 8 pitches.</p> <p>It should be noted that of the 386 new site allocations proposed, 270 of these proposed units were adopted in the current local plans 'daughter' document so it would appear that only enough land for 116 houses is being proposed in the whole of the Eastern area.</p> <p>This will only amount to 6.8 additional houses per year up until 2039 on top of the already allocated sites from the current local plan, which is clearly not a satisfactory position bearing in mind the significant shortage of houses in country, especially going by the fact that this area is not constrained by the AONB.</p> <p>RSA 7 (HSA11 from current local plan) has had delivery issues that that the access is not agreed with all the land owners, so that site is currently able to be delivered until all the land owners and Highways are satisfied that this can be achieved. This amounts to 35 houses that are proposed in the 2022-2039 proposed local plan.</p> <p>The reasoning for the significantly reduced amount of houses being proposed is due to increase in size of the Burghfield AWE DPEZ and the proposed policy wording to take a starting position of 'NO' on any developments proposed in the DPEZ zone.</p> <p>Point 6.32 of the SP14 claims that;</p> <p><i>"In the Eastern Area the significant constraints to development mean provision for new development is more limited. Though Grazeley had been identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers</i></p>

the area of Grazeley. The change resulted in objections to the Grazeley garden town proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation. No strategic allocation is therefore made in this spatial area.”

This is somewhat of a misleading statement in effort of seeking to restrict the whole of the DPEZ zone from additional housing. The ONR did object to the 15000 houses proposed at the Grazeley Garden village, but they did not object to any of the other sites that were deemed acceptable in the original HELLA document.

Jessica McGuinness who is the Policy and Communications Directorate at ONR have advised the following regarding some direct questions on the DPEZ;

1. The consequences report states that the DPEZ zone now needs to be a minimum 3160m from the AWE Burghfield, is there a requirement from the ONR that it needs to be in excess of 3160m?

ONR Response

ONR has not made a specific requirement for the DEPZ for AWE Burghfield to be in excess of 3160 m. Under the provisions of REPP19, the site operator's consequences report recommends the minimum geographical extent of the DEPZ to the Local Authority and the Local Authority is prohibited from setting the DEPZ any smaller than this minimum. REPP19 permits the Local Authority to extend the DEPZ in consideration of certain factors set out in the regulations and the REPP19 Approved Code of Practice provides more information on how this should be done in practice.

2. Does the 2019 RIPPIR report or consequences report state that no additional houses are allowed within 5km of the AWE Burghfield?

ONR Response

REPP19 does not state that no additional houses are allowed within 5 km of AWE Burghfield. REPP19 requires that the Local Authority make an adequate off-site emergency plan for a radiation emergency. Demographic changes within the DEPZ may affect the adequacy of the plan and so Local Authorities are expected to monitor and control such changes.

The AWE Burghfield Consequences Report does not state that no additional houses are allowed within 5 km of AWE Burghfield. REPP19 requires that the site operator produce a consequences report, but does not require that the consequences report make a recommendation on developments within the DEPZ.

3. Although the ONR do not draft or implement the West Berkshire policies, but the ONR would be consulted on this emergency plan, so was the 5km radius, and strictly no additional houses within 5km a requirement of the ONR?

ONR response

ONR Land Use Planning consultation zones and consultation criteria are available [here](#). For applications that meet our consultation criteria we request consultation within the DEPZ and also within a 5km Outer Consultation Zone which has been set by ONR around AWE Burghfield. ONR has not specified that no additional housing can be built within these zones, but when ONR is consulted on an application it will seek assurance from the local authority emergency planners that the proposed development can be accommodated within the existing off-site emergency planning arrangements (or an amended version). If the ONR Inspector does not receive adequate assurance of this, ONR will advise against the development.

There has never been any individual site assessment done on any of the other sites that were deemed “developable” prior to the changes to the DPEZ in 2020, and to suggest that the office of nuclear regulation has specifically stated that no more houses can be built in the DPEZ zone is somewhat wide of the mark.

The issue has come about because the WBC emergency planners have significantly increased the size of the DPEZ zone well beyond the UPAZ 3160m, and as a result now has significantly more houses. It should be noted that in the Burghfield DPEZ zone, since the HELLA was undertaken there has only been an additional 30 houses on the Reading Road, Burghfield common, and 100 houses have gained an outline consent granted on Clay Hill Road, Burghfield Common. The latter consent in Clay Hill road was granted outline consent after the proposed changes to the DPEZ and this site is well within UPAZ 3160m zone

The new DPEZ zone around Burghfield AWE splits parts of Sulhamstead, and goes beyond the settlement boundary of Burghfield Common, so is going against the RIPPAR 19 directives.

Dr Keith Pearce who has undertaken a detailed assessment of not only Charlesgate Homes promoted site SUL1 (Benhams farm, Hollybush Lane), but also undertaken a risk assessment on the likelihood of any radiation leaks from AWE Burghfield, and the likely risk is causes to existing and future residents.

There is absolutely no supporting scientific evidence to support a housing monitorium in Burghfield common, this is proven in the attached report from Dr Keith Pearce.

The HELLA assessment highlighted that the site SUL 1 in Burghfield common is;

“The site is well related to the existing town of Burghfield Common. Burghfield Common is a Rural Service Centre, and has a range of services and reasonable public transport provision, and is a focus of development in this area. The site itself is in close proximity to a range of services and facilities, with good connections via existing pathways and rights of way to connect to the countryside to the west. The proposal would bring forward custom and self-build plots which is of benefit. The Landscape Character Assessment noted that the landscape strategy is to positively manage the land to avoid suburbanisation of the fringe of this settlement. High quality design and a sound layout scheme will therefore be important, and will need to factor in the setting of the nearby Grade II listed building Crofters Cottage.

The access will need to be upgraded, both on the access road and onto Hollybush Lane. Overall the site is likely to have a positive effect on sustainability and the SA/SEA does not highlight any significant sustainability effects. Issues which need resolving relate to updating the ecological surveys, undertaking a Heritage Impact Assessment, and undertaking a Minerals Resource Assessment”

The HELLA conclusion for SUL 1 was that;

“Potentially developable. Small risk of surface water flood risk on north part of site may affect capacity. Allocation would be dependent on a review of the settlement boundary of Burghfield. Landscape capacity work and ecological surveys needed.”

The sole reason for the site being taken out at a potentially developable site is;

“The site’s location within the Detailed Emergency Planning Zone (DEPZ) of Burghfield Atomic Weapons Establishment, and the impact of development on ‘blue light services’ and the emergency off site plan would mean that 43 dwellings would not be suitable within this location. An updated emergency off site plan is due in January 2021. Due to the presence within the DEPZ the site is not recommended for allocation at this time, dependent on the conclusions of the off site plan.”

It has been proven in the attached “AWE Burghfield emergency planning implications for a proposed development at Benham’s Farm, Hollybush Lane, Burghfield Common, Reading RG7 3JS” that there is no justification to support a housing moratorium in and around the Burghfield AWE, the size and position of the extended DPEZ is not justifiable, and SUL1 should not be omitted as a developable site on this reason alone.

Summary

1. The supporting Evidence from Dr Keith Pearce which is attached, highlights that there is no scientific evidence to support the claim that no more houses can come forward in the DPEZ.
 2. The sole reason for the site being omitted is because it is within the DPEZ, the site has gone from potentially developable to deemed as unsuitable, due to WBC seeking to impose a housing moratorium by way of the extended DPEZ zone as well very restrictive policy wording.
 3. The proposed development site SUL1 is outside the UPAZ where prompt protective actions (in this case shelter) are estimated to be able to provide a nett benefit if the postulated accident occurred on the AWE Burghfield site while the wind was blowing towards the proposed development site under relatively unlikely weather conditions. Therefore, no detailed emergency plan is required to enable urgent protective actions at this site.
 4. The potential radiation dose to people living on the proposed development are so low and the probability of any such event affecting the site so low that we can assert with confidence that the AWE Burghfield site does not pose a significant risk to those who might live in the proposed development site, Benhams farm, Hollybush lane, Burghfield Common (SUL1)
 5. The dose rates at the proposed development site during and after the postulated event would be sufficiently low as to allow life as normal, including home visits by emergency services and in-home service providers.
 6. There are a number of sensible options to redefine the DEPZ such that the development site would be outside it. This would remove all the REPPiR-19 emergency planning requirements except those associated with severe accidents and outline planning.
 7. The AWE Burghfield site will not be affected by external hazards resulting from a residential development this far away.
 8. The development will not affect the ability of the emergency services or others to gain access to, or egress from the site and so will have no impact on the ability to respond any event on the AWE Burghfield site.
 9. This proposal does not raise serious safety concerns nor does it lead to a breach the ONR demographic criteria.
 10. It is concluded that the proposal would not present a barrier to the ability of emergency services to safely carry out their duties, and nor would it affect the Council’s ability to execute and manage its obligations under the REPPiR plan.
 11. Given the above, the local authority can provide the ONR with “adequate assurance that the proposed development can be accommodated within their existing off-site emergency planning arrangements (or an amended version)” allowing the ONR to allow the inclusion of SUL1 in the 2022-2039 local plan as an allocated housing site for self and Custom building.
- It has been proven in the attached document “AWE Burghfield emergency planning implications for a proposed development at Benham’s Farm, Hollybush Lane, Burghfield Common, Reading RG7 3JS” that there is no justification to support a housing moratorium in and around the Burghfield AWE, the size and position of the extended DPEZ is not justifiable, and SUL1 should not be omitted as a developable site on this reason alone. The HELLA highlights the site is a developable site, and the only thing that is stopping the site coming forward as an allocated site is because of the location of the site in the extended DPEZ zone even though it is well outside of the UPAZ.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	

4. Proposed Changes

SP14 Site allocations Eastern area

Additional supporting information for inclusion of Benhams Farm, Hollybush lane, Burghfield Common, RG7 3JS (SUL1)

Site location.

Benhams farm proposed site (SUL1) is located off Hollybush lane and the land is currently accessed via Oakley Drive.

The site is adjacent to the settlement boundary and benefits from having an extensive tree lined screening from both the Northern and Eastern Boundary viewpoints. The site also benefits from being screened from the southern public viewpoint from the Sulhamstead public bridleway, by the houses that have been built on Oakley Drive.

The eastern boundary of the site is slightly visible at points from the Sulhamstead bridleway although this is only limited due to the farm buildings and Residential buildings that block public viewpoints into the proposed site.

The site is largely flat with a slight fall to the northern boundary.

The site is located in Sulhamstead Parish, but lies adjacent to the Burghfield Common settlement boundary.

Local amenities

The proposed site is within 1km of a good level of local facilities that include the following:

Schools

- Willink secondary school
- SUN infant and Junior school
- Mrs Blands Infant school
- Garlands Junior School

Leisure facilities

- Willink Leisure center, that included indoor swimming pool, all weather floodlight pitches, sports hall, gymnasium.
- Skate park
- Burghfield recreation ground
- Good access to cycle routes
- Good access to the Englefield estate for walking, running and dog walking

Local shops

- 4 convenience stores
- 3 takeaway outlets
- 2 restaurants
- Bakery
- Butchers
- Fruit and veg outlet
- Pet store
- 2 estate agents
- Funeral directors
- Curtain store
- 2 x Hairdressers
- Mechanics
- Petrol station
- Numerous bus stops
- 2 x public houses within 3km

The site location also has the benefit of being within 2-3 miles to;

- Mortimer
- Theale
- Tadley

All of which have a good levels of access to additional amenities, schools, places of employment and train stations.

The site also benefits from having good links to the M4 and M3 as well as green park industrial estate.

Access and services

The site is accessed of highway standard road, Oakley drive, that is 5.5m wide also has the potential for a pedestrian access footway onto Hollybush lane.

The site has the benefit of already having the following services to the site or within the access roadway Oakley drive:

- Mains drainage
- Mains water supply
- Mains gas Supply
- Mains electric supply
- BT services

Due to the above services already being on the site or within the road, this reduces any further need to cause disruption to residents with road closures to upgrade the supplies as they are already in place.

Site proposal

The site is being promoted as a self and Custom build site and will enable self or Custom builders to purchase serviced plots with a outline consent along with a plot passport that will highlight the parameters

to which WBC would agree to design and size wise so that they are able to design their own homes to their own designs and budgets.

There is a huge demand for self and Custom build houses in West Berkshire, which is highlighted within the Self build register. There has also been significant demand for serviced plots in this location, when it was promoted as a potential self and Custom build site, to see if the demand was there.

At this moment there is no specific policy to satisfy this demand for self and custom build and as result very limited self and custom build serviced plots are becoming available within West Berkshire Council.

WBC HELLA on SUL 1 (Benhams Farm) site inclusion Supporting comments

The site is well related to the existing village of Burghfield Common.

Burghfield Common is a Rural Service Centre, and has a range of services and reasonable public transport provision, and is a focus of development in this area.

The site itself is in close proximity to a range of services and facilities, with good connections via existing pathways and rights of way to connect to the countryside to the west.

The proposal would bring forward custom and self-build plots which is of benefit. The Landscape Character Assessment noted that the landscape strategy is to positively manage the land to avoid suburbanisation of the fringe of this settlement. High quality design and a sound layout scheme will therefore be important, and will need to factor in the setting of the nearby Grade II listed building Crofters Cottage.

The access will need to be upgraded, both on the access road and onto Hollybush Lane.

Overall the site is likely to have a positive effect on sustainability and the SA/SEA does not highlight any significant sustainability effects.

Issues which need resolving relate to updating the ecological surveys, undertaking a Heritage Impact Assessment, and undertaking a Minerals Resource Assessment.

The Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) indicates that a predominately positive sustainability impact.

There are positive effects in delivering affordable and custom and self-build housing; supporting healthy and active lifestyles, enhancing Green Infrastructure, conserves the character of the landscape subject to design and layout; makes efficient use of land; and has the opportunity to embed the principles of climate change into the development.

Outstanding issues relate to the impact on heritage assets, ecology, and the minerals safeguarding area and proximity to Firlands, a preferred option for minerals extraction.

The site is within the catchment for Mrs Blands and Garland primary schools.

Mrs Blands is approximately 490m from the site.

Garland is approximately 1km from the site.

The scale of the development would be absorbed into the catchment population.

In terms of secondary provision, the school is within the catchment for The Willink School which is located approximately 550m away.

This development could be incorporated into the existing catchment population

The site is the ownership of three landowners and is available immediately. A developer has an option on the land.

Access would be from Hollybush Lane and the landowner has ownership over the access road.

The site has already been the subject of planning applications (16/00658/OUTMAJ for the site only, plus small scale development to the south), and amendments to the site access at Hollybush Lane as well as improvements to the lane are required.

There would be no impact on the local highway network.

The nearest bus stop, on Clayhill Road/Omer's Rise, is approximately 620m from the site, providing regular services between Tadley and Reading, including Mortimer.

HELLAA conclusions: Potentially developable. Small risk of surface water flood risk on north part of site may affect capacity. Allocation would be dependent on a review of the settlement boundary of Burghfield. Landscape capacity work and ecological surveys needed.

WBC HELLA on SUL1 (Benhams farm) Reasons for not being allocated

The Sole reason for this site not being sought as an allocated site is as below:

The site's location within the Detailed Emergency Planning Zone (DEPZ) of Burghfield Atomic Weapons Establishment, and the impact of development on 'blue light services' and the emergency off site plan would mean that 43 dwellings would not be suitable within this location.

An updated emergency off site plan is due in January 2021.

Due to the presence within the DEPZ the site is not recommended for allocation at this time, dependent on the conclusions of the off site plan

As of March 2023 we have still not be provided with copies of "updated emergency plan" that was due in Jan 2021.

The attached assessment from Dr Keith Pearce ("AWE Burghfield emergency planning implications for a proposed development at Benham's Farm, Hollybush Lane, Burghfield Common, Reading RG7 3JS") <see attached document Charlesgate Homes_attachment_Response to AWE DEPZ zone> who qualifications include a BSc (Hons) degree in Physics, a PhD in Nuclear Physics and an MSc in Emergency Planning Management. He is a fellow of the Emergency Planning Society and a Chartered Physicist.

	<p>Dr Pearce has extensive experience and expertise in that he has written the REPP19 Hazard Evaluation and Consequence Assessment and the Consequence Report for a fuel enrichment company.</p> <p>helped local authorities understand the Consequence Report sent to them by operators; helping them understand the risk profile of the site they host and to develop appropriate off-site plans.</p> <p>Between 2005 and 2014 he was Head of Emergency Planning, responsible for the developing, maintaining and testing of the on-site emergency plans and responsible for supporting the local authority in the preparation and testing of the off-site plans for 10 reactor sites across the UK. In this role he liaised with local authorities, regulators, emergency responders, health bodies and government departments and played an active role on several national committees.</p> <p>Dr Pearce report does not support the concerns to omit this site due to be included within the DPEZ especially as it is outside the 3160 UPEZ.</p> <p>Summary</p> <ul style="list-style-type: none"> • The site is very well related to existing settlement • The site is very close to many local amenities • The site has a positive sustainability impact in terms of the overall HELLA assessment • The site will secure much needed supply of serviced self and Custom build serviced plots • The site has all services already to the land by way of drainage, water, electric, BT and access road. • The site was previously listed as developable prior to the DPEZ being increased in size and WBC changing the policy on development within the DPEZ. • The proposed site would have no impact on 'blue light services' serving AWE Burghfield • Dr Keith Pearce has undertaken a full assessment on the site and advises the site would have no detrimental impact on the DPEZ and therefore omitting the site as an allocated site on these grounds alone are not supported by the evidence supplied within Dr Pearces report. <p>We believe the supporting evidence supplied within the HELLA and Dr Pearces report should enable WBC to now include SUL1 as an allocated site and we believe this this site should be included as a site suitable for the development of self and Custom build plots within the West Berkshire Council local plan 2022-2039</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>The site SUL1 Benhams Farm, Holybush Lane, Burghfield, RG7 3JS was initially listed as a site suitable for development and strongly supported as a site in the HELAA.</p> <p>The changes to the DEPZ and changes to policy have meant this site was taken out as an adopted site, but feel the need to highlight to the inspector and potentially to have my expert witness Dr Keith Pearce also alongside me to provide additional evidence regarding the DEPZ and what impact this site would have on the Burghfield AWE and also what impact the Burghfield AWE would have on future residents.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Bell Cornwell LLP))
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Brigid

	Taylor
Agent Organisation	Bell Cornwell LLP
Comment ID	PS1244
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	PS1244 Bell Cornwell (Hathor) Heritage.pdf PS1244 Bell Cornwell obo Hathor Property attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Site Selections and Reg 19 plan finalised and voted through for public consultation prior to finalisation of HELAA and full range of site assessments. Decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development.</p> <p>Public comments invited until 3 March, in the knowledge of proposed Full Council meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process.</p> <p>Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comments on full assessment of the impact of the proposed development strategy/ site allocations</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The LPR does not allocate any small sites, less than 1ha, for general residential development in the Eastern Area. Rather, it provides for a 65 bed care home (RSA6) and 8 pitches (RSA24). The NPPF (para 69) emphasises that small and medium sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. The LPR should accommodate at least 10% of the housing requirement on sites no larger than 1ha. We submit that it would be sensible to take this approach in <i>each</i> of the three spatial areas, including the Eastern Area.</p> <p>Our client's site is located directly adjacent to the settlement boundary of Brimpton, is not in the AONB or at risk of flooding. Nor is it within the AWE DEPZ. It is available immediately and could provide small scale housing relatively quickly. Given the LPR's reliance on large strategic development locations which may take many years to gain planning permission, deliver necessary supporting infrastructure (such as schools) and become available for occupation, we submit that the Council should also allocate our client's site to boost delivery of small scale housing sites in the immediate short term.</p> <p><for map see attachment></p> <p>We propose our client's land as an additional site allocation in the Eastern Area. The land in which our client has an interest (see attachment) has not previously been submitted to, or assessed within the HELAA.</p> <p>This 0.65ha parcel of land is partially within the settlement boundary (in the southern portion of the site near Forge Cottage) but otherwise directly adjacent to the boundary. As seen in Figure 1 (on the right) the form of the settlement is such that the site is encompassed within the settlement, with existing residential development to the north, west, south and directly adjacent to the lower part of the site to its west.</p> <p>The Parish Council has previously expressed support for realignment of the settlement boundary to include this site, subject to public consultation and the 'right' development coming forward (further detail is provided below). As can be seen from the mapping in Figure 1, an adjustment to the settlement boundary to include this site (to allow for small scale infill development on this land) would be appropriate to the historic form of the settlement. The site is well contained (by residential development) and the settlement boundary would prevent and further development beyond the site into the countryside.</p> <p>Part of the site is within the Brimpton Conservation Area. A Heritage Impact Assessment has been prepared, to consider the heritage impacts of small scale housing on the site. The report concluded that such development would have a neutral impact on nearby listed buildings/ non designated heritage assets.</p> <p>The part of the site which is in the Conservation Area is assessed as having no special historical or architectural interest and in fact recommends its removal from the designated area. Development of the site would have a negligible adverse effect on the setting of the Conservation Area. The report is attached for your review and consideration. We would highlight, in particular, the comment at paragraph 9.4.15 of that report regarding the decision to include this open area at Brimpton Road in the Conservation Area. This suggests that the Conservation Area boundary in Brimpton includes some arbitrary/ marginal areas which were perhaps erroneously included in the boundary when moving from paper to digital mapping in the 1980s.</p> <p>The site is outside the AONB. The Landscape Character Assessment (Aug 2019) identifies the site as being within:</p> <ul style="list-style-type: none"> • National Landscape Character Area 129: Thames Basin Heaths • West Berks Landscape Classification: WH2: Greenham Woodland and Heathland Mosaic. This area is defined by gently undulating slopes which rise to Greenham and Crookham Common further west of the site. The eastern area of WH2, in which Brimpton is situated, is "distinguished by the presence of a mix of arable and pasture contained by a network of woodlands." It describes Brimpton as a more "nucleated village, focused around the junction of Brimpton Road, Brimpton Lane, Crookham Common Road and Wasing Road." The site is situated right at the centre of the village, at the 'nucleus', as it were. <p>Being so centrally located within the village, the site is in easy walking distance of the local primary school (Brimpton CoE). No allocations have been proposed in Brimpton, despite the presence of local facilities and services, and close proximity to urban areas for employment. This is based on the settlement hierarchy report and its significant focus on public transport (as opposed to active travel) which is discussed further below.</p> <p>From Brimpton, it is a short cycle ride to many employment locations/ local services and facilities, including:</p> <ul style="list-style-type: none"> • Midgham Station: 10 minute cycle ride (1.9 miles) • Thatcham Station: 15 min cycle ride (2.7 miles) • Reading: 10 min cycle to Midgham followed by 17 minute commute by rail to Reading. • Basingstoke: 10 minute (2.2 mile) cycle to Baughurst, then 25 min bus to Basingstoke Hospital/35 to centre/ railway station • Aldermaston: 13 mins cycle (2.2 miles) • Greenham Common: 10 min cycle (2.2 miles) • Newbury: 38 min cycle (7.2miles)

	<p>In the Eastern Spatial Area, no sites of less than 1ha have been proposed for allocation for general housing. The NPPF recognises the role that small sites can play in quick delivery of housing and requires that 10% of allocations be of small/ medium size. Given the LPR's reliance on large strategic development locations, we urge the Council to consider including this site within the settlement boundary and/ or allocating it for development in the LPR before submission to Independent Examination.</p> <p>Please refer to our comments on SP3 and the Settlement Hierarchy and also SP1 (Spatial Strategy) and the Settlement Boundary Review.</p> <p>In summary, the evidence base and early LPR work has shown that:</p> <ul style="list-style-type: none"> • There is some Parish Council support for realignment of the settlement boundary to include our client's site, subject to public consultation and a suitable development proposal. This feedback was provided as part of consultation to the Settlement Boundary review; • The parish Plan supports proposals for up to 10 additional houses in the village, particularly affordable housing or homes for downsizers; • The public supported a recent proposal for 4 new homes in the village, demonstrating a need for housing for families and lack of suitable options; • The HELAA demonstrates that the landscape could accommodate some infill development to the north of the site – a conclusion which must also rationally apply to our client's site. • Development on this site would amount to infill, based on the form and arrangement of the settlement. Brimpton Road features linear housing development opposite the site and to the north. This site could accommodate infill development along the road frontage in a manner which is respectful to the form and character of the settlement. <p>The only reason, it seems, for not allocating any additional housing in Brimpton, or altering the boundary to provide scope for infill, is its rating in the Settlement Hierarchy. Our representations on SP3 demonstrate that the site is accessible via active transport to a number of services, facilities and employment centres. The Settlement Hierarchy review is overly focused upon public transport rather than other sustainable modes of transport, such as active travel (cycling and walking). It also fails to take account of altered working patterns following the pandemic, with a large proportion of workers now working from home for part of the week, thereby reducing the need to travel/ commute to work.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • maps • Heritage Impact Assessment
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Allocate land to the west of Brimpton Road, Brimpton, for small scale residential development. The site is not in the AONB or at risk of flooding and can be developed without adverse impact to heritage assets. Development could come forward as infill development continuing a gap in the building line north and south. This would deliver a small site less than 1ha in the Eastern area, where none is presently proposed. Rather than plan only delivers care home/ pitches on small sites in the Eastern Area.</p> <p><for map see attachment></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes</p>	<p>Yes</p>

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1421
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site identified by policy RSA10 (Whitehart Meadow, Theale) is not suitable for development for the reasons I give under Policy RS10</p> <p>The site identified by policy RSA11 (Old Sewage Works, Theale) is not suitable for development for the reasons I give under Policy RSA11</p> <p>Transport Assessment</p> <p>Sites identified by policies RSA10 and RSA11 have not been included in the West Berkshire Strategic Transport Model</p> <p>Sites RSA10 and RSA11 are close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which is unsustainable</p> <p>Traffic generated from proposed housing sites RSA10 and RSA11 would greatly exacerbate existing traffic problems in Theale. Traffic data provided by SatNav company TomTom (derived from mobile phone data) for the period 1st to 4th April 2019 (i.e. before the pandemic) show the following problems:</p> <p>Morning peak Delay (Secs)</p> <ul style="list-style-type: none"> • High St eastbound 78 • High St westbound 82 • A4 Hoad Way to J12 M4 51 • J12 eastbound 60 • Bradfield Rd eastbound/Church St 67 • Bradfield Rd westbound/A340 60 • Common Hill eastbound 192 • A340 southbound/A4 192 • Englefield Rd northbound/A340 37 <p>Evening peak Delay (Secs)</p> <ul style="list-style-type: none"> • High St eastbound 74 • High St westbound 77 • A4 Hoad Way to J12 M4 34 • M4 J12 eastbound 75 • Waterside Dr northbound 164 • Waterside Dr southbound 81 • Brunel Rd westbound 85 • Brunel Rd eastbound 69 • Common Hill eastbound/A340 69 • A4 westbound/A340 52 • Englefield Rd westbound/A340 54 • Englefield Rd eastbound/Church St 45 <p>Air Quality</p> <p>No Air Quality Assessment has been carried out for proposed sites RSA10 and RSA11</p> <p>Para. 6.34 The sites proposed to be allocated for housing in Theale are not suitable for development for the reason I give under policies RSA10 and RSA11, below <see rep ID: ></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>“the rural service centre of Theale” should be removed from section 6.34.</p> <p>Other suitable sites identified in the HELAA should be allocated where these will help retain services, such as primary schools, shops, pubs, churches, village halls, etc. in villages</p> <p>Transport Assessment</p> <p>The sites in Theale identified by policies RS10 and RSA11 should be included in the Transport Model and any necessary mitigations identified</p> <p>The sites in Theale identified by policies RS10 and RSA11 should be removed from the LPR</p> <p>Please also see sections on policies RSA10 and RSA11 for additional reasons for rejecting these sites.</p> <p>Air Quality</p> <p>Air Quality Assessment should be carried out for sites RSA10 and RSA11</p> <p>The sites in Theale identified by policies RS10 and RSA11 should be removed from the LPR</p>
<p>5. Independent Examination - If your representation is seeking a</p>	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	To explain to the inspector why the transport modelling should include these sites [RAS10 and RSA11] To explain to the inspector why these sites [RSA10 and RSA 11] are unsustainable
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Turner, Caz
Consultee Full Name	Caz Turner
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1108
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/01/2023 19:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I have recently seen the local plan for Theale and surrounding areas.</p> <p>I believe this has previously been rejected for multiple reasons. And it should be again.</p> <p>Theale is NOT in a place to be having further dwellings built in it. Theale is already stretched to capacity and local services, ESPECIALLY the doctors surgery are overwhelmed. Unless the local services are going to be upgraded or made larger, Theale cannot sustain any further developments or dwellings. It is already impacting on the people, like myself, who have lived here for decades.</p> <p>I remember Theale 20 years ago. And it is nothing like what it is now. Theale used to have character and and wasn't built up. Now? Now you struggle to park, you can't get a doctors appointment (which may also be down to the nhs situation) and they've already had to build a larger primary school.</p> <p>Please, please, consider the current residents of Theale before deciding to build more homes which will further damage our village.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1273
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	PS1273 Opus Works (Calcot Golf Club & Bewley) Full LPR Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p><i>[See attachment 'Opus Works (Calcot Golf Club) Full LPR Rep' for full consultation response]</i></p> <p>We have reviewed the Local Plan Review (LPR) and we wish to submit our representations in response to policies and proposals, which impact upon the development plans of Bewley Homes PLC and Calcot Park Golf Club (CPGC). In the paragraphs below, we will identify the relevant policies and proposals before commenting on them either in support, or in the form of an objection, which we trust West Berkshire Council (the Council) as the Local Planning Authority (LPA) will give careful consideration before the next draft of the local plan is published for public review.</p> <p>Policy SP1 - Spatial Strategy</p> <p>This policy states that the overall approach to development will be based on three spatial areas:</p> <ul style="list-style-type: none"> • Newbury and Thatcham • Eastern Area • North Wessex Downs AONB <p>Calcot is within the Eastern Area, which is identified as a focus for housing development. CPGC is located on the eastern edge of Calcot/Tilehurst, within the greater Reading conurbation. Therefore, in accordance with policy SP1, it is a suitable and sustainable location for housing development.</p> <p>The identification that additional development is needed and come forward within settlement boundaries to meet identified housing need in the LPR is welcomed.</p> <p>Policy SP3 - Settlement Hierarchy</p> <p>This policy states that development in West Berkshire will comply with the spatial strategy set out in policy SP1. Development will be focused on the most sustainable settlements. The Urban Areas (including the Eastern Urban Area) will be the prime focus for housing and economic development, offering development potential through: regeneration of built-up areas; allocated sites in the LPR and Neighbourhood Plans; retention of settlement identity and necessary supporting infrastructure.</p> <p>In this case, we consider that land at CPGC is suitable for allocation in a development plan, as it lies within the settlement boundary of the most suitable and sustainable location for residential development, according to this policy.</p> <p>Policy SP7 - Design Principles</p> <p>This policy states that new development will strengthen a sense of place through high quality locally distinctive design and place shaping. It will make places better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.</p> <p>CPGC consists of 81 hectares (200 acres) of gently sloping land and woodland located within the settlement of Calcot, which is surrounded on all sides by the built-up area of Greater Reading. The golf club contains considerable areas of woodland and green infrastructure. A modest housing development for c.72 dwellings on c.5.8 hectares (14.3 acres) of land at the north-eastern edge of the golf club, see Appendix 1 for details of the proposed site location and potential site layout, will offer the opportunity to make good use of this valuable green infrastructure to create a verdant and attractive "landscape-led" scheme, which will conserve and enhance the existing landscape character and historic context of the site and its wider surroundings. The location of the site within the built-up area and on land in leisure</p>

use at present will offer unique opportunities to improve access to verdant, open areas and leisure facilities for new residents and existing ones. The health and well-being benefits of the proposal for the local population, will be significant.

Policy SP8 - Landscape Character

This policy states that landscape-led development which conserves and enhances the biodiversity and local distinctiveness of the landscape character of the district will be supported. With regard to development proposals, particular regard will be given to: valued features and qualities; sensitivity and capacity of area to change and ensuring that new development is appropriate in terms of location, scale and design to the context of the existing settlement form, pattern and character.

CPGC does not lie in a sensitive landscape location. The site is remote from the AONB to the west and it is surrounded on all 4 sides by urban development. It has been used historically as a practice range and more recently for accommodation of material dredged from CPGC's lake and swales. As stated above, the 81-hectare land holding contains substantial areas of woodland and Green Infrastructure (GI). The proposed development, of just 5.8 hectares, in the north-eastern corner of the GC, adjoining the existing built-up area, will be screened by dense areas of woodland on all sides. The sloping topography and the existence of significant woodland and GI, means that there are few long-distance views into the site and the development site makes a modest contribution to the landscape setting of the settlement and the surrounding area.

In this context, any planning application for development on the CPGC will be supported by a Landscape and Visual Impact Assessment (LVIA), which will demonstrate that proposed built form will not have a harmful impact on the existing settlement form, pattern and character and will come forward as part of a landscape-led scheme.

Furthermore, the proposed replacement clubhouse, which will be funded by the new residential development, will sit on the same footprint and will be surrounded by additional landscape planting and bunding, to ensure that it blends into the landscape and does not result in any additional harm over that attributable to current built form being done to the site and its surroundings, including the Grade II* Calcot Court. The new homes and clubhouse will provide significant economic, environmental and social benefits for the local community, whilst not harming the landscape character of the area and its surroundings.

Policy SP10 - Green Infrastructure

This

policy states that the council will maximise the potential for strengthening both local and strategic Green Infrastructure (GI) across the district. Development will protect and enhance existing GI assets, create additional GI which is integrated into the overall development and take opportunities to achieve multi-functionality by bringing GI functions together. A series of criteria are then provided to set out how to protect and optimise GI within the District.

CPGC is a land holding of 81 hectares (200 acres). Only 5.8 hectares (14.3 acres) is proposed for residential development in the north-eastern extremity of the land holding. There is considerable scope available to use parts of the remaining landholding to plant new trees and other GI to enhance and protect the verdant character and appearance of the local area. Other sites that the council has selected for development do not have the scope for GI improvements on this scale. Allocation of land at CPGC will ensure that significant GI improvements will be provided as part of a landscape-led scheme. The availability of so much land in the same ownership and adjoining the proposed development will offer opportunities to make a significant net gain in GI, which will be to the benefit of the local community. Land could also be used to improve GI provision to compensate for the allocation of other small development sites in the Eastern Area, where opportunities are limited on the allocated sites. Given the location of the GI, on CPGC, which is managed by a team of experienced green keepers, it will be possible to ensure that any new planting is maintained and properly managed over the long-term, which will ensure that the GI improvements are there to be enjoyed by the local community for many decades to come.

Policy SP11 - Biodiversity and Geodiversity

This policy states that development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver net gain. Development proposals across the district will be expected to deliver 10% net gain for biodiversity either within the site boundary or as off-site compensation where appropriate.

On a landholding of 81 hectares, with only 5.8 hectares proposed for residential development, there will be considerable scope for the provision of biodiversity net gain. This will be available not only for the c.72 dwellings proposed by CPGC, but it could potentially be available for other smaller residential sites to utilise. To support the forthcoming planning application, a bio and geodiversity assessment will be undertaken to establish what measures should and could be taken to provide at least a 10% net gain. The results of surveys and recommendations by ecologist experts will form part of this process and ensure that the proposal will make a positive contribution to bio and geodiversity in the local area to the

benefit of the local community, both in visual and well-being terms. Such improvements will ensure that CPGC contributes positively the bio and geodiversity of the locality for the foreseeable future.

Policy SP14 - Sites allocated for residential development and mixed-use development in the eastern Area.

The policy lists a number of sites of varying sizes, which are proposed to be allocated for residential development.

Within Tilehurst only a 65 bedspace care home, equating to c.35 dwellings is allocated. As part of the HELAA, which helps to form the evidence base for the LPR, there is an identified need to build 175 dwellings over the next 15 years, yet there are no allocations for housing development proposed in the Tilehurst Neighbourhood Plan (TNP), which is at a relatively advanced stage.

It is considered that provision of c.72 dwellings at CPGC would help to meet identified local need and remove any requirement to impose housing numbers and allocations upon the TNP given that it covers the most sequentially preferable location for development in the District.

The 5.8 hectares of land at CPGC, is gently sloping with limited long distance views. It is heavily screened and fully enclosed by existing woodland and there are considerable opportunities available to provide a landscape-led scheme that will enhance and improve the visual amenity of the local area and at least 10% biodiversity net gain. Use of land owned by CPGC to enhance the natural environment within a sustainable location, as part of a modest development of c.72 dwellings will lead to considerable improvements to the amenities, wellness and mental health of both existing, and future, local residents.

In its current form, it is therefore considered that Policy SP14 has not allocated sufficient sites to help meet the District-wide shortfall of 1,809 dwellings identified in the Local Plan; this number having increased by 148 units since the earlier Reg 18 consultation.

Policy SP14 – Sites allocated for residential and mixed-use development in Eastern Areas is Objected to, because insufficient land is allocated to meet identified need. CPGC needs to be included in the list of larger sites (1ha or larger) for the allocation of c.72 dwellings.

Policy DM39 - Local Community Facilities

CPGC is a leisure-based business, located within the Eastern Area, adjacent to many homes and local residents who make use of its attractive open spaces to play golf and visit the facilities. The sport of golf is currently under a great deal of pressure. Player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. Against this, it is important for the local community to have access to sports and recreation facilities, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being. In this regard, it is noted that in supporting text to Policy DM39, paragraph 12.62 identifies 'Areas or places for community outdoor sport or recreation' within the definition of local community facilities.

CPGC is a leisure facility located in a highly accessible location. It is a business that supports 17 FTE jobs and it maintains c.81 hectares of attractive and maintained land, which would otherwise suffer from lack of stewardship. There are significant community, well-being and environmental benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.

Policy DM39 provides support for new and expanded provision of local community facilities, subject to meeting a number of criteria relating to need, accessibility, design, engagement and use of spaces. The proposals at CPGC have been subject to lengthy and meaningful engagement and consideration to identify how to best respond to changing needs and demands in the golf industry and to deliver on inclusivity and diversity ambitions.

The new clubhouse will have much improved facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements will be possible; the golf club ownership of c.81 hectares of rural land offers tremendous scope for investment in the local area. It will not just be a case of allocating 5.8 hectares of land and getting c.72 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.

A scheme of c.72 dwellings is currently proposed, which has been subject to significant due diligence at pre-application stage and identified as a quantum that could provide both the enabling development desired and the delivery of affordable housing.

Therefore, should a lower quantum of housing be considered appropriate on-site further to discussions with the Council, it would need to be acknowledged that retention of long-term golf at CPGC is the

	<p>scheme driver and that there will be consequential reduction in the delivery of affordable housing; to be determined by Viability Assessment.</p> <p>The improvements to the clubhouse and course will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible in these testing times, if an enabling development of c.72 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide capital to ensure the golf club is robust and can thrive into the future.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As the site at CPGC is sustainably-located, well-screened, can provide substantial GI improvement and will enable the significant improvement and long-term retention of a well-recognised leisure and community facility, it is considered that Policy SP14 should the LPA consider the representations made in support of allocation of the land at CPGC for residential development to have merit, CPGC respectfully suggest the following policy wording:</p> <p>Proposed Policy RSA XXX – Land at Calcot Park Golf Course, Calcot</p> <p><i>This 5.8 hectare site lies within the north eastern perimeter of Calcot Park Golf Club, adjacent to the Tilehurst residential area. The site will deliver high quality, sustainable development that will:</i></p> <p>a) Provide for c.72 dwellings at a mass and density that reflects the character of the adjoining settlement; b) Respond positively to the special characteristics and sensitivities of the landscape to minimise any visual impacts; c) Respond positively to the surrounding heritage assets, particularly Grade II* Listed Building Calcot Court, to avoid harm to the significance of the Listed Building and its setting; d) Provide significant Green Infrastructure improvements in line with Local Plan Policy SP10; e) Avoid or mitigate adverse impacts on key species and habitats whilst ensuring at least 10% biodiversity net gain in line with Local Plan Policy SP11; f) Ensure adequate infrastructure is provided for sewage and surface water drainage; g) Ensure appropriate measures are put in place to mitigate impacts on the highway network; h) Improve the long-term viability of the golf course through enabling the redevelopment of the Calcot Park Golf Club clubhouse and other improvements to the Golf Course, this to be secured by S106. i) A Viability Report will be required to identify the level of affordable housing capable of being supported by the proposed, enabling residential development.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Russell Trust
Consultee Full Name	I Cheshire R Shaw & The Russell Trust
Consultee Organisation	
Agent Full Name	Mr John Cornwell
Agent Organisation	
Comment ID	PS1174
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The following submissions are made on behalf of the above three landowners who own part of the land allocated under Policy HSA 16 in the Adopted West Berkshire Local Plan 2017. The land in question is identified as Policy HSA16 'Land to the rear of The Hollies Nursing Home, Reading Road and Land opposite 44, Lamden Way, Burghfield Common'. Phase One of the site has already been implemented for some 28 dwellings. The second phase, owned by the above landowners is proposed for 32 dwellings. The allocation of that site was the result of many years of promotion by the landowners and the examination of that land for housing through a lengthy development plan preparation process. The allocation was followed by the optioning of the land by a reputable local developer and the submission of a detailed planning application in early 2022 under ref: 22/00244/FULEXT.</p> <p>Between the adoption of the Local Plan in May 2017 and the submission of this planning application in February 2022 there was a material change to the planning policy context to this site by the extension of the Detailed Emergency Planning Zone (DEPZ) at AWE Burghfield to cover all of the settlement of Burghfield Common, including this allocation site. This change occurred in March 2020. In December 2020 the Council consulted on this Local Plan Review Emerging Draft which commenced in December 2020, nine months after the DEPZ had changed, yet the site was still proposed for allocation in that Draft Plan. It is assumed that the Council's Emergency Planning Officer, AWE personnel and the Office for Nuclear Regulation (ONR) were consulted on this Draft Plan and had no objection to the inclusion of this housing allocation at that time despite the site now clearly inside the revised DEPZ area. There was therefore no necessity to challenge the Draft Plan's provisions at that time as far as this allocation was concerned. It was assumed, reasonably, that the Council had taken the DEPZ changes into account and had determined that the allocation should be maintained because of its statutory status and that the site was capable of accommodating new housing without adversely affecting the ability of the Council to implement the Emergency Offsite Plan.</p> <p>During consideration of the planning application the Council's Emergency Planning Officer objected to the proposed development and the application was subsequently refused, essentially the principle issue being the site's location within the DEPZ. That decision is awaiting an appeal decision by way of a Public Local Inquiry at the time of writing.</p> <p>The purpose of these submissions is therefore twofold. Firstly, to secure the reinstatement of this Housing Allocation in this Local Plan Review; and second, to seek a revision to Proposed Policy SP4 'Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield'.</p> <p>The case for reinstatement of Housing Allocation HSA16 in this Local Plan Review.</p> <p>The only reason for proposing the removal of this housing allocation is because of its recent inclusion into the widened DEPZ at AWE Burghfield. The Council undertook extensive assessment of all potential housing sites in its SHELAA prior to proposing and confirming this housing allocation throughout all stages of the preparation and consultation of its current Local Plan. Additionally, there was very little local objection to the site's allocation for housing. Indeed, it was one of two sites in Burghfield Common recommended by the Burghfield Parish Council for allocation. The other is at Pond House Farm on the other side of the valley to this site, which secured an outline planning consent before the DEPZ was extended, and is currently under construction. During the consideration of planning application ref: 22/00244/FULEXT the site was the subject of full and detailed technical assessments to address its suitability for the housing scheme proposed. The only substantial planning objection was its inclusion within the recently extended DEPZ. The site had been the subject of detailed examination through a whole Local Plan process, including Examination in Public, and also via a detailed planning application.</p> <p>If the DEPZ objection is to be applied consistently, as it has been to this planning application, then it effectively sterilises Burghfield Common to all new housing development. The Settlement Hierarchy identifies Burghfield Common as one of only six Rural Service Centres across the whole of West Berkshire District which are sustainable in terms of the services and facilities provided within them and which are therefore appropriate to accommodate a reasonable level of new development appropriate to their character and function. This means that any new development in future would have to be met by the remaining three Rural Service Centres in the Eastern Policy Area i.e. Mortimer, Pangbourne and Theale, each of which is arguably already more constrained to new development than Burghfield Common and where appropriate development sites are therefore harder to identify. This is not sensible planning since the Policy's effective sterilization of Burghfield Common to new development cannot reasonably be justified when weighed against the proper planning requirements of the area.</p> <p>As matters are now proposed either the Council:</p> <p>A) Continues to apply the policy of no further housing development at Burghfield Common, contrary to good and sustainable planning; or</p> <p>B) This Local Plan Review addresses properly the issue of Proposed Policy SP4 and amends that Policy to allow Burghfield Common to accommodate the levels of sustainable housing development which it is</p>

	<p>capable of accommodating and can and should support, but in a manner that meets the safeguarding needs of AWE and ONR. I set out below a revision to Proposed Policy SP4 which meets both requirements.</p> <p>In conclusion, Proposed Policy SP4 and its predecessors are unreasonable and open to inconsistent application, to the detriment of the policy itself and good planning in general. The policy wording is too constraining, preventing new development in locations which are entirely appropriate; and unreasonably constraining fully sustainable settlements such as Burghfield Common from accommodating their share of new housing growth. Housing Allocation HSA16 is an example of such an appropriate location. Half of it has already been developed, it is allocated in a statutory Local Plan and its development will not adversely impact on the ability of the Council to implement the Emergency Offsite Plan. The allocation should properly be reinstated as a Housing Allocation in this Local Plan Review. Proposed Policy SP4 should be re-worded as set out above.</p> <p>I would be grateful if you would take these comments into account in your further Local Plan Update preparations. If any additional information of clarification is required please do not hesitate to contact the writer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	TA Fisher & Sons Ltd (Represented by Pro Vision)
<p>Consultee Full Name</p>	TA Fisher & Sons Ltd
<p>Consultee Organisation</p>	TA Fisher & Sons Ltd
<p>Agent Full Name</p>	Miss Katherine Miles
<p>Agent Organisation</p>	Pro Vision Planning & Design
<p>Comment ID</p>	PS1365
<p>Chapter / Policy / Appendix Number</p>	Policy SP 14
<p>Chapter / Policy / Appendix Title</p>	
<p>Order</p>	47

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:09:00
Attached Files	Pro Vision (T A Fisher) Full Rep.pdf Pro Vision (T A Fisher) Site Promo Doc.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>These representations have been prepared by Pro Vision on behalf of our client T A Fisher & Sons Ltd in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039: Proposed Submission.</p> <p>Our client welcomes the opportunity to be involved in the preparation of the Local Plan Review and it is within this context that they wish to make representations to the draft Local Plan.</p> <p>Our client has an option on Land at West End Road, Mortimer (HELAA ref. SM2; SHLAA ref. MOR005), that has been promoted for development. The landowner, Englefield Estate, has endorsed the submission of these representations.</p> <p>Our client's land interest has not been allocated for development in the draft Local Plan. This is due to Policy SP14 of the draft Local Plan not allocating additional housing to the village beyond that already</p>

accommodated in the current Stratfield Mortimer Neighbourhood Development Plan (NDP) (June 2017), which extends until 2026.

These representations therefore respond to Policy SP14 regarding the absence of a housing allocation to Stratfield Mortimer beyond 2026. We consider that it is necessary for the Local Plan Review to allocate additional housing to the village, which can be accommodated through a NDP Review, up to the end of the Plan-period in 2037.

In this regard, the land at West End Road, Mortimer, is suitable, available and achievable for housing development, as well as being deliverable in full within the next five years (or later in the plan period to meet locals needs after 2026). The Site is well located close to existing facilities and housing.

The Site offers the potential for a sustainable and logical residential development of approximately 47 dwellings, alongside associated access and open space, in line with the Council's strategy for growth and settlement hierarchy. The Site Promotion Document provided in Appendix A of these representations is re-submitted in support of the development opportunity.

T A Fisher is a well-respected local house builder with a long association with Mortimer. The Council will be aware that T A Fisher is currently building out the 110 units on the MOR006 site (Tower Gardens). T A Fisher worked collaboratively with Stratfield Mortimer Parish Council and the Neighbourhood Plan during the preparation of the Adopted Neighbourhood Plan and has maintained a positive working relationship with the Parish Council during the planning application and ongoing construction phases.

Our client wishes to work collaboratively with the District and Parish Council with the aim of securing the sustainable development of the site – through the NDP process – following an allocation of additional housing to the village within the Local Plan Review. These representations therefore respond to the draft Local Plan and its evidence base with reference to the need to allocate additional housing to Stratfield Mortimer, alongside the wider matters identified within the Document, building upon the information previously submitted.

These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework (NPPF) (July 2021) and Planning Practice Guidance (PPG).

Whilst, at this stage, we consider that the Local Plan Review is unsound, we have provided some recommendations to ensure that the Plan is made more robust.

Overview

Policy SP14 of the draft Local Plan details the sites that are allocated for residential development in the Eastern Spatial Area.

This includes an allocation for 110 dwellings in the Stratfield Mortimer Designated Neighbourhood Area up to 2026.

This is accommodated in Policy RS5 of the Stratfield Mortimer Neighbourhood Development Plan (NDP) (June 2017), which allocates the Land to the South of St John's Church of England Infant School (SHLAA ref. MOR006) for 110 dwellings. This land is also owned by our client, and is currently being built out following the grant of planning permission.

At present, Policy SP14 fails to allocate additional housing to Stratfield Mortimer beyond that already accommodated in the current NDP (Policy RS5 for 110 dwellings) up to 2026.

Furthermore, Policy SP14 fails to recognise that as the draft Local Plan extends to 2039, additional housing should be allocated at Stratfield Mortimer beyond 2026, in line with the spatial strategy and settlement hierarchy and in accordance with the NPPF, within the remaining 13 years of the Plan-period.

These representations therefore respond to Policy SP14 regarding the absence of an allocation of new housing to Stratfield Mortimer beyond 2026. We consider that the Local Plan Review should allocate additional housing to the village, as it is a sustainable location suitable for growth, to be accommodated through a NDP Review.

Neighbourhood Plan Review

The Stratfield Mortimer NDP was formally made in June 2017. It is already therefore over five years old.

Whilst the PPG (footnote 1) notes that *"There is no timeframe within which neighbourhood plans are required to be reviewed or updated."* the PPG (footnote 2) also outlines the value of reviewing / updating a NDP alongside the review / update of strategic policies. It notes that:

"When strategic housing policies are being updated, neighbourhood planning bodies may wish to consider whether it is an appropriate time to review and update their neighbourhood plan as well. This should be in light of the local planning authority's reasons for updating, and any up-to-date evidence that has become available which may affect the continuing relevance of the policies set out in the neighbourhood plan."

Page 17 of the NDP sets out that *"Any future policy development or significant development which affects the parish will be subject to an update of this NDP involving community consultation."*

The Stratfield Mortimer Neighbourhood Plan steering group website sets out their intentions for *"a wider-reaching longer-term revision to the Plan, to reflect latest national policies and community priorities. This new Plan version is expected to be approved by Autumn 2024 and valid until 2039."*

The NDP and Local Plan Review would therefore be aligned and based on the same Plan-period as the Local Plan Review i.e. end date of 2039.

Future Growth in the Neighbourhood Area

In light of the above, it is clear that Policy SP14 of the draft Local Plan should recognise the potential growth that can be accommodated in Stratfield Mortimer throughout the whole Plan-period i.e. beyond 2026, up to 2039. This can be achieved through a review of the Stratfield Mortimer NDP.

However, the draft Local Plan fails to make such provision. This fails to accord with paragraph 66 of the NPPF, which explains that:

*“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. **Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.** Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement (our emphasis).”*

This requirement is underlined by the PPG (footnote 3), which notes that:

*“Housing requirement figures for neighbourhood plan areas are not binding as neighbourhood planning groups are not required to plan for housing. However, **there is an expectation that housing requirement figures [for Designated Neighbourhood Areas] will be set in strategic policies**, or an indicative figure provided on request (our emphasis).”*

Policy SP15 of the draft Local Plan confirms that new housing has been allocated to other Designated Neighbourhood Areas. This is explained in paragraph 6.14 of the draft Local Plan, which notes that:

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

The Designated Neighbourhood Areas that have been allocated housing in policy SP15 are Hungerford (55 dwellings) and Lambourn (25 dwellings).

Paragraph 6.38 of the draft Local Plan sets out its reasons for not allocating additional housing to Mortimer. It sets out that:

*“110 dwellings are already allocated up to 2026 in the Stratfield Mortimer Neighbourhood Plan. The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. **Given the outstanding dwellings still to deliver, no additional allocations in the plan period are proposed** (our emphasis).”*

This is incorrect. Mortimer is a Rural Service Centre – one tier above that of a Service Village. Indeed Policy SP3 identifies Mortimer as a Rural Service Village and states *“These larger rural settlements offer development potential appropriate to the character and function of the settlement through: ... Non-strategic sites allocated for housing and economic development through other policies in the LPR or neighbourhood plans;”*. Clearly therefore, as a Rural Service village, it has the services and facilities to support additional development and indeed should be a focus for growth. 2.19 This Council’s approach to not allocate housing to Mortimer fails to recognise the growth that a sustainable village such as Mortimer could and should accommodate over the remainder of the Plan-period, in addition to that already planned for. This is a significant missed opportunity. Such an approach does not accord with the spatial strategy and settlement hierarchy set out in Policies SP1 and SP3 of the draft Local Plan respectively.

Regarding the other Designated Neighbourhood Areas that have been allocated additional housing over the Plan-period (Hungerford and Lambourn), the Site Selection Background Paper4 and draft Local Plan simply explains that each area is in the process of preparing a NDP and will include residential allocation(s). There is no reference to the potential for / opportunities provided by allocating housing to areas with existing NDPs that could be reviewed and deliver further sustainable development within the Plan-period (up to 2039).

Given the sustainability of Stratfield Mortimer as a location for growth, it is inappropriate for the village not to receive an additional housing requirement simply because it has already allocated some land for housing. The Stratfield Mortimer NDP is clear that it covers the period up until 2026. It is therefore necessary to review the potential for the village to accommodate additional growth over the additional thirteen years provided by the Local Plan Review.

We recommend that discussions take place with the Parish Council regarding this matter to ensure that the Local Plan is capable of being found sound in line with paragraph 35 of the NPPF.

Land at West End, Mortimer

Appendix A of these representations contains the Site Promotion Document previously submitted to the Council in support of the land owned by our client at West End Road, Mortimer (HELAA ref. SM2; SHLAA ref. MOR005). This sets out, in detail, the suitability of the site for development.

In summary, the site is suitably located to the west of Mortimer and offers the potential for a sustainable and logical residential development of approximately 47 dwellings, alongside associated development, in line with the Council’s strategy for growth and the settlement hierarchy outlined in policies SP1 and SP3.

For the reasons explained in Section 2 of these representations, we consider that the Local Plan Review should allocate additional housing to Stratfield Mortimer, beyond that currently planned up to 2026, as outlined in the Stratfield Mortimer NDP.

It is acknowledged that the Local Plan itself will not allocate specific sites for housing in Designated Neighbourhood Areas, as this is to be addressed through the NDP process. Nonetheless, the submitted Site Promotion Document reiterates the sustainability of Stratfield Mortimer, while confirming that land owned by our client at West End Road, Mortimer is suitable, available and achievable for housing development, as well as being deliverable in full within the next five years. It is well located to assist with meeting the village’s housing needs.

In summary, while not exhaustive, key reasons as to why the site is a suitable location for development include the following:

- The site is adjacent to the settlement of Mortimer, which is identified as a Rural Service Centre in the settlement hierarchy.

- Rural Service Centres have a range of services and reasonable public transport provision and provide opportunities to strengthen the role in meeting the requirements of surrounding communities. The site is within easy walking distance of the village centre and the range of services and facilities that it provides.
- There is a train station to the east of Mortimer which provides connections to Reading and Basingstoke. The village is also served by a regular bus service to Tadley, Burghfield, Mortimer rail station and Reading.
- The northern, eastern, and southern boundaries of the site adjoin the settlement boundary.
- The site represents a logical 'rounding off' opportunity for the village. Through the use of an appropriate design and density, this will ensure the scheme remains in-keeping with the village character.
- The site is under option to a Local Housebuilder, T A Fisher who can not only ensure the deliverability of the site but can also ensure a high standard of design as achieved elsewhere on their sites in this area.
- Existing mature hedgerows bound most of the site and would largely be retained.
- The site is relatively flat.
- The site can accommodate approximately 47 dwellings, including affordable housing.
- The site can deliver a mix of 1, 2, 3, 4- and 5-bedroom homes.
- There is the potential to provide a Local Area for Play (LAP) on site.
- A safe and suitable access can be achieved.
- The site is not within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and would not harm its setting.

Considering the above, it is clear that the site is a suitable and sustainable location for residential development that has the potential to provide a wide range of benefits.

Furthermore, T A Fisher is currently building out the development of 110 units in the village. Providing additional housing beyond the 110 units will contribute to maintaining the vitality of this community beyond the current plan period. T A Fisher wish to continue working collaboratively with the Parish Council and local community to deliver additional housing within the village to meet needs. As a local house builder, and with an existing strong connection to the Parish, our clients have a clear understanding of local need and demand including the type and style of properties that the Parish Council wish to see and the local market wants to buy.

Conclusion

These representations have been prepared by Pro Vision on behalf of our client T A Fisher & Sons Ltd in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039: Proposed Submission.

Our client welcomes the opportunity to be involved in the preparation of the Local Plan Review and it is within this context that they wish to make representations to the draft Local Plan.

Our client has an option on the land at West End Road, Mortimer (HELAA ref. SM2; SHLAA ref. MOR005) and is promoting this land for development with the consent of the landowner, Englefield Estate.

Our client's land has not been allocated for development in the draft Local Plan. This is due to Policy SP14 of the draft Local Plan not allocating additional housing to the village beyond that already accommodated in the current Stratfield Mortimer Neighbourhood Development Plan (NDP) (June 2017), which extends until 2026.

These representations therefore respond to Policy SP14 regarding the absence of a housing allocation to Stratfield Mortimer beyond 2026. We consider that it is necessary for the Local Plan Review to allocate additional housing to the village, which can be accommodated through a NDP Review, up to the end of the Plan-period in 2039.

In this regard, the land owned by our client at West End Road, Mortimer, is suitable, available and achievable for housing development, as well as being deliverable in full within the next five years. It is well located to assist with meeting the village's housing needs.

The site offers the potential for a sustainable and logical residential development of approximately 47 dwellings, alongside associated development, in line with the Council's strategy for growth and settlement hierarchy. The Site Promotion Document provided in Appendix A of these representations is re-submitted in support of the development opportunity.

We consider our client better placed than most to bring forward development in Mortimer given their existing and established working relationship with the Parish and community. Our client wishes to work collaboratively with the District and Parish Council with the aim of securing the sustainable development of the site – through the NDP process – following an allocation of additional housing to the village within the Local Plan Review. These representations therefore respond to the draft Local Plan and its evidence base with reference to the need to allocate additional housing to Stratfield Mortimer, alongside the wider matters identified within the Document, building upon the information previously submitted.

In summary, our main comments in relation to the draft Local Plan are as follows:

- The need to recognise the role that Stratfield Mortimer can play beyond 2026, given that it is identified as a Rural Service Village that is suitable for growth in line with the Council's spatial strategy and settlement hierarchy.
- The need to allocate additional housing to Stratfield Mortimer beyond that already accommodated in the current Stratfield Mortimer NDP, which extends until 2026. This can be accommodated through a NDP Review, up to the end of the Plan-period in 2039.
- The need for the Council to engage with Stratfield Mortimer Parish Council regarding its aspirations for the future of the village.
- The need to review the level of housing that the Council is looking to accommodate to ensure that it provides a suitable buffer to allow flexibility to allow housing targets to be met, assists with addressing the pressing need for affordable housing in the District, as well as the additional

	<p>economic, social and environmental benefits associated with a higher level of growth, alongside the potential need to assist neighbouring authorities with meeting any of their unmet housing needs.</p> <ul style="list-style-type: none"> • The need to review the approach to housing delivery as it is overly reliant upon two complex, large sites (Sandleford Park and North East Thatcham), windfalls and existing planning commitments to deliver a large proportion of the District's housing need. • The need for additional housing allocations to ensure that planning decisions remain Plan-led throughout the whole Plan-period, there is sufficient flexibility in the Council's housing supply and the Plan is deliverable. • Confirmation that land at West End Road, Mortimer is suitable, available and achievable for housing development, as well as being deliverable in full within the next five years. • The need for minor amendments to some of the development management policies/matters within the draft Local Plan. • Compliance with national planning policy and guidance. <p>Whilst, at this stage, we consider that the Local Plan Review is unsound, we have provided some recommendations to ensure that the Plan is made more robust.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Full Rep (inc. footnotes) • Appendix 1 - Site Promotion document
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Tilehurst Parish Council
<p>Consultee Full Name</p>	Miss Jacky Major
<p>Consultee Organisation</p>	Tilehurst Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1664
<p>Chapter / Policy / Appendix Number</p>	Policy SP 14

Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We note that this section describes how 513-538 dwellings per annum will be provided from existing planned developments, windfall within settlement boundaries, the defined sites and allocations within named neighbourhood plans. Whilst we understand these numbers are not a limit, it is good to see that no further development is necessary outside settlement boundaries to meet the anticipated housing need and that the plan delivers the anticipated need. It is also reassuring to see that windfall sites of 10 units or more are not included in the calculation of future supply, so there is no need for large-scale development within settlement boundaries.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sulham Estate (Represented by Barton Willmore now Stantec)
Consultee Full Name	Mr Henry Scutt
Consultee Organisation	Sulham Estate
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1641
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:13:00
Attached Files	PS1641 Barton Willmore (Sulham Est) Utilities.pdf PS1641 Barton Willmore (Sulham Estate) EandS Statement PS1641 Barton Willmore (Sulham Estate) FRA.pdf PS1641 Barton Willmore (Sulham Estate) Heritage Impact.pdf PS1641 Barton Willmore (Sulham Estate) Layout Plan.pdf PS1641 Barton Willmore (Sulham Estate) LVA Ap1.pdf PS1641 Barton Willmore (Sulham Estate) LVA Ap2.pdf

	<p>PS1641 Barton Willmore (Sulham Estate) LVA Ap3.pdf PS1641 Barton Willmore (Sulham Estate) LVA.pdf PS1641 Barton Willmore (Sulham Estate) LVA Ill. Mat.pdf PS1641 Barton Willmore (Sulham Estate) Red Line Plan.pdf PS1641 Barton Willmore (Sulham Estate) Sust Statement.pdf PS1641 Barton Willmore (Sulham Estate) TA.pdf PS1641 Barton Willmore (Sulham Estate) Trees.pdf PS1641 Barton Willmore (Sulham Estate) Vision Doc.pdf PS1638 Barton Willmore (Sulham Estate) Aff Housing Tech Note.pdf</p>
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>In response to the scope of the Regulation 18 Consultation we commented that we did not agree with the Council's approach to housing delivery, on the basis that the Local Plan Review did not include any additional site allocations in Tilehurst. The Regulation 19 Draft Local Plan does not include any additional site allocations under this Policy and therefore we maintain our objection to the Council's approach.</p> <p>The Council recognises the "close functional relationship" between the urban area of Tilehurst and Reading (as stated at paragraph 4.14 of the Draft Local Plan). As such, the development at Hall Place Farm represents a highly appropriate location to provide residential development within the context of the wider housing market area.</p> <p>The Council should consider the most sustainable areas to ensure that the contribution they can make to housing delivery is fully optimised. Hall Place Farm on the edge of Tilehurst represents an appropriate location for growth on a site which is deliverable within the short term. The site is well-related to existing infrastructure and services including public transport and schools. Please refer to the Vision Document submitted with these representations for further details.</p>

Land at Hall Place Farm (TIL18) was ruled out through the site selection process on the basis that “development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape”.

This is an incorrect assessment of the site and relationship to the settlement/wider landscape. As set out in the accompanying Landscape and Visual Appraisal for Land at Hall Place Farm, the Site not only immediately adjoins the existing western settlement boundary of Reading, but is physically and visually separated from the wider open countryside to the north-west and west of the Site. This is by the combination of the existing topography and the containment provided by the substantial woodland and vegetation to the west of the Site, such that the Site is orientated to and well related to the existing settlement of Reading, rather than to that the open or wider countryside.

Furthermore, as a consequence of the above, the Site is physically, visually and functionally related to the existing residential area of Tilehurst on the western edge of the settlement of Reading. Set within the existing residential development to the north and south the Site, provides the opportunity for the continuing rounding off of the settlement edge of Reading.

It is inappropriate for the Council to discount sites purely on basis of AONB without detailed landscape consideration. West Berkshire is dominated by AONB (74% of the district) which leads to large swathes of urban areas directly abutting the AONB. As a result, some of the most sustainable locations for small and medium scale development, well related to existing services and facilities are within the AONB. This is the case with Tilehurst as this part of the Eastern Urban Area directly abuts the AONB. Consideration of development opportunities in these areas should be based on sound landscape principles.

The Site should be included within the settlement boundary and allocated for development for the following reasons:

- It is visually well contained, and whilst on rising ground is not highly visible, nor located on an exposed ridge, landform or open slope.
- It is well contained by boundary vegetation and is developed in part, and is therefore not an open undeveloped parcel.
- It is not a recreational or amenity open space which extends into the countryside.
- Existing woodland and tree belts on the western edge of the Site would form a natural western boundary to the settlement, and already assist in screening views of the western edge of Reading from the wider countryside
- It immediately adjoins the western settlement boundary of Reading and is set within the context of existing residential areas to the immediate north, north-east, east, south-east and south, and is therefore not an isolated area of potential development and is not physically or visually detached from the settlement of Reading.
- Whilst the Site comprises areas of horse paddocks, these are physically and visually enclosed by the immediately surrounding woodland and vegetation, such that they do not visually relate to the open countryside, but more to that of the adjoining settlement edge of Reading.
- It does not form an important gap between developed areas in fragmented settlements.

On this basis, the site presents an opportunity for development which is consistent with the existing settlement form and, could be successfully and sympathetically accommodated within the landscape.

Omission Site Attachments:

- Red Line Plan
- A Vision for Hall Place Farm
- Illustrative Layout
- Landscape and Visual Appraisal
- Heritage Impact Assessment
- Sustainability Statement
- Energy & Sustainable Design Principles
- Transport Appraisal
- Ecology Opportunities and Constraints (Confidential due to potential for harm to protected species)
- Flood Risk Assessment
- Arboricultural Assessment

Whilst we acknowledge that some of these documents are dated 2018 and, as such, past their typical lifespan for the purpose of a planning application, the baseline conditions on site and reflected in the report remain unaltered. As such, we consider that these continue to provide a helpful and informative baseline to relevant technical considerations. Should the Council wish to explore the deliverability of the site in further detail, we would be pleased to update these reports.

Our consultation response follows up on our comments to the Council's Regulation 18 consultation undertaken in February 2021. Whilst Land at Hall Place Farm has not been allocated in the regulation 19 Draft Local Plan Review, we believe that there is merit in re-emphasising the benefits of the site and restating previous points raised in our previous consultation.

As emphasised within these representations, our client's site, Land at Hall Place Farm, is deliverable within the short to medium term and offers a sustainable location for the delivery of up to 80 homes. The documentation which accompanies these representations demonstrates that the proposed development can be successfully accommodated and is able to address all relevant constraints.

It is noted that the Council held an Extraordinary Meeting on 2nd March to decide whether they proceed or withdraw the current consultation. The related agenda item itself describes the current Local Plan consultation as containing serious 'omissions and ambiguities' which make the plan unsound. The flaws appear to principally relate to the northeast Thatcham allocation and how processes were followed including communication of key information to Council Members. The housing number relevant to this allocation is also in doubt. The ultimate vote resulted in the motion being lost and the Plan consultation to continuing. These important matters of soundness and related procedural matters will need to be addressed prior to the submission of the plan for examination. We reserve our position with respect to

	making further representations on this matter at any subsequent consultation or at the Examination stage or at any further.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Based on the comments above, we request the following: - The Council to reconsider the overreliance on larger sites through the allocation of more small / medium sites to ensure a consistent delivery of homes. The above will ensure that this approach is 'effective', 'justified' and 'consistent with national policy.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We would welcome the opportunity to be notified of the progress of the Local Plan Review and to participate in the examination hearing session.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tilehurst NDP Group
Consultee Full Name	Miss Jacky Major
Consultee Organisation	Tilehurst NDP Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1734
Chapter / Policy / Appendix Number	Policy SP 14
Chapter / Policy / Appendix Title	
Order	47
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:45:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>HELAA Appendix 4 - It is not clear where or how the figure of 138 dwellings has been generated. The developer has submitted multiple unsuccessful planning applications over many years, the latest being for 265 dwellings, revised to 165. This was refused at committee in April 2022 and the decision was not appealed. It is noted that Stage 2a Development Potential states "Up to 138 dwellings but known issues exist which are likely to decrease this number". This statement has not been carried into Appendix 8b (below). Additional important details that contribute to rejection of this site from the Plan have also not been transferred to the SA/SEA. Some examples are detailed below.</p> <p>Local Green Space Designation (Stage 2b Suitability): it should be noted that part of the land has been identified as being suitable for LGS designation in the Tilehurst NDP which recently completed Regulation 14 Consultation.</p> <p>TIL19 *New Site* Calcot Park Golf Club, Calcot, Reading.</p> <p>This site has been added to the HELAA site assessment. Tilehurst Parish Council has no record of being consulted on the inclusion.</p> <p>The site is inside the settlement boundary so it is not clear why it is assessed here. Its inclusion is making an already complex Planning Process even more incomprehensible and concerning to local residents, particularly when they see references to potential development of 130 houses or up to 335 flats. The "Availability" determination for this site has multiple "unknowns"- legal issues, timeframe for bringing forward for development, potential timeframe for development, and whether a developer/housebuilder is involved. Since the site promoter has been sufficiently involved to indicate a number of dwellings it seems odd none of these other factors are known yet.</p>

For clarity it should be noted again that the Local Plan Review clearly defines how expected housing need will be met through strategic site allocations outside the settlement boundary, allocations from named NDPs and small scale (less than 10 units) windfall inside the settlement boundary. Windfall development on this scale within the settlement boundary will not be required to meet the anticipated need.

Appendix 8b – SA/SEA of New Residential Site Allocation Options

TIL14 Pincents Lane, Tilehurst.

P.31 States “Parish/Town Council: No comments”

This council is not aware of any request for comment on this document or the revised HELAA.

Whilst this Council agrees with the decision not to include this site in the updated Plan, it feels the sound planning reasons behind this decision are not adequately explained in this document.

Numerous important points from the updated HELAA site assessments have been poorly summarized or omitted altogether from the summary tables.

For example, under “Air Quality, Pollution & Contamination” (Stage 2b Suitability) the HELAA Site Assessment states-

“The site is close to the M4 and A4.

Significant worsening of nitrogen dioxide and particulate matter. Medium risk of contamination.

Medium risk to future occupants from nearby commercial uses. Medium risk to neighbours”

Yet in the summary table of this document, it merely states “The site is unlikely to impact on air quality”. The HELAA wording is relegated to a footnote and does not seem to have been taken into account in the summary.

The HELAA Site Assessment notes- “The site will generate circa 828 vehicle movements per day with circa 83 during peak hours. There is much concern regarding the impact along Pincents Lane and along the A4.”

No reference is made to this in the summary table of this document under “To promote and maximise opportunities for all forms of safe and sustainable transport”, except to note “Locally there are significantly concerns regarding access to the site.” It is not clear why this text is under the heading “mitigation/enhancement”.

It is concerning to local residents familiar with the history of this site to see the words “At the time planning permission is sought for development at this site...”. This implies a planning application is expected despite the numerous failed previous attempts and this site’s rejection as not developable in the proposed Local Plan Review.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Policy SP 15 Sites allocated for residential development in North Wessex Downs AONB

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Musgrave and Begley, M&W (Represented by Fisher German LLP)
Consultee Full Name	Mr M and W Musgrave and Begley
Consultee Organisation	
Agent Full Name	Angela Brooks
Agent Organisation	Fisher German LLP
Comment ID	PS151
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 14:36:00
Attached Files	Fisher German obo MusgraveandBegley
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This consultation response has been prepared by Fisher German on behalf of our clients Mr M Musgrave and Mr W Begley in respect of their land adjacent to Oxford Road, Chieveley, as illustrated in the attached.</p> <p>The land, which extend to circa 6.58ha, is located to the east of Chieveley. The site is defined by residential development and Graces Lane to the south, Oxford Road to the east, residential development and East Lane to the north and a field to the west. The site benefits from mature boundary planting and forms a logical infill location close to the centre of Chieveley.</p> <p>These representations follow the order of the policies within the Submission Plan, wherein we have not commented we have no specific comments at this stage. If you have any questions regarding these representations, please contact the author.</p> <p><i>Extract of response relevant to consultation point:</i></p> <p>We welcome and support the Council's acknowledgement that Chieveley should receive residential allocations. This will assist to ensure its long-term vitality and vibrancy by meeting local housing needs. Whilst within the AONB, high quality new development which fits with existing settlements is considered to have a limited impact on this wider designation. The failure to deliver sufficient housing will however have very real impacts on the day to day lives of residents, forcing young people away due to rising house prices and lack of suitable available homes. Populations in rural areas will likely age, trends which can be seen locally and nationally, and average house occupancy will lower as children grow up and move away. This lowering and ageing of the rural population will have repercussions on the ability of services and facilities to stay open, which will lead to a gradual decline of sustainability. Chieveley has a high level of service provision, as demonstrated by the Settlement Audit, and this is something which must be supported by commensurate new housing, ensuring the vitality of the community.</p> <p>Whilst we recognise the Council has allocated a site in Chieveley, for the reasons set out in these representations we consider there to be significant merit in additional allocations in Chieveley, as 15 dwellings alone is clearly insufficient having regard for the high level of housing need, particularly affordable. As such we consider the Council should positively consider our client's land for allocation. Whilst the entirety of the site is considered available, a smaller section of the site can be selected. The larger nature of the site provides for significant opportunities for associated landscaping, amenity space and biodiversity net gains, whilst contributing to the overall attractiveness and value of the AONB.</p> <p>In respect of our client's site, the Council's stage 1 sieving document concludes: "<i>Development would result in harm to the AONB, and would be inappropriate in the context of the existing settlement form and pattern.</i>" Highways raised concerns about the lack of pedestrian route into Chieveley, and difficulties in providing one.</p> <p>Linear development similar to that allocated by the Draft Local Plan, on Graces Lane and/or East Lane would have no more impact in terms of harm to the AONB than the preferred allocation, and arguably even less so when having regard for the potential harm to historic designated assets associated with the current allocation's location. Linear development would also not be inappropriate in terms of existing settlement form and pattern, it would be entirely in accordance with the prevailing settlement form, which is frontage development onto the existing road network. Whilst the highways concern is noted, it is clearly not a demonstrable issue for existing residents, and it would equally be applicable to the draft allocation, so cannot reasonably form a reason for exclusion.</p> <p>Development on our client's site would have a highly limited impact on the historic core of Chieveley, unlike the draft allocation, by virtue of being located away from the historic core of the settlement, its Conservation Area and Listed Buildings. Development here would also not impact on highways, as on street parking is less of an issue here, and there isn't the pressure for parking from the services and facilities in the village centre.</p> <p>Whilst there would need to be some removal of hedgerow, it is considered the ecological impact would be far less than the draft allocation. Particularly so on land north of Graces Lane, as access could be gained from east of the public right of way, where there is only low-level scrub. This would have a significantly less impact than that proposed by the draft allocation. The removal of this vegetation is considered to have a limited impact on settlement character, unlike the removal of the mature vegetation on the draft allocation, which will have more significant impacts.</p> <p>On the basis of the above, it is considered that there is compelling justification to allocate our client's land to provide significant local benefits. We do not consider sufficient justification has been provided as to why the Council have considered a smaller section of the draft allocation, and seemingly not any omission sites. As set out in previous representations and submissions, the site provided is just our client's land in its totality, but we are entirely content with a smaller parcel being allocated if preferable. This approach is prejudicial to those landowners whose sites have been excluded early, as the approach taken has not been consistent. Clearly, we argue if that approach is adopted in respect of our client's land, there are two opportunities to allocate land (linear development along Graces and East Lane) which are commensurate to the Council's preferred allocation, for the reasons set out above.</p> <p>We also consider that land under our client's control can be allocated to assist and deliver any shortfall of housing land supply, particularly to assist in meeting any needs arising in respect of the Council's preferred allocations, particularly the strategic allocations. Despite being in the AONB, Chieveley is a sustainable settlement which can deliver a higher quantum of growth than is currently proposed, without</p>

	causing any undue harm to the AONB. Having regard for the more acute housing needs in this area, particularly affordable, the benefits associated with this delivery would be significant. <i>For full response please see attachment.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newman, Paul
Consultee Full Name	Mr Paul Newman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS659
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 11:52:00
Attached Files	PS659 Paul Newman - Accessibility and Sustainability PS659 Paul Newman - Upper Basildon Strategic Site Options.pdf PS659 Paul Newman - Vision for Upper Basildon (Site 1).pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>That no development has been allocated for Upper Basildon, where development can help provide new community facilities, employment opportunities, self build and custom housing and help sustain the existing facilities within the village.</p> <p>An opportunity to make Upper Basildon more sustainable, by including an allocation for a new village shop and employment should have been considered.</p> <p>An opportunity has been missed to allocate land in Upper Basildon where high existing house prices are keeping local people out of the local housing market. This can be fixed by the allocation of land for new development in Upper Basildon.</p> <p><i>[The following attachments accompany the representations:</i></p> <ul style="list-style-type: none"> • PS659 Paul Newman – Accessibility & Sustainability • PS659 Paul Newman – Vision for Upper Basildon (Site 1) • PS659 Paul Newman – Upper Basildon Strategic Site Options]
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	<p>Yes</p>

* Yes * No	
Please give reasons for your answer	
4. Proposed Changes	I wish to promote land in Upper Basildon for development as part of the Local Plan Review
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I wish to make representations to the Inspector about the omission of any development in Upper Basildon. I would like the opportunity to put a case to make Upper Basildon more sustainable by the delivery of a local shop and employment.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Kimberley Parry
Agent Organisation	Neame Sutton Ltd
Comment ID	PS633
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:08:00
Attached Files	PS633 Neame Sutton (Donnington New Homes) Appendix B.pdf PS633 Neame Sutton (Donnington New Homes) Appendix C.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>New Homes considers that this policy should be revised to account for the opportunities to release land to enable delivery of housing in the early years of the Plan, particularly within the sustainable settlement of Hungerford.</p> <p>Site Specific Representations - Land at Smitham Bridge Road & Marsh Lane</p> <p>This section addresses the promotion of the site at land at Smitham Bridge Road (housing) and Marsh Lane (allotments). The site has been promoted through the emerging Hungerford Neighbourhood Plan (HUN7 & HUN9) (Appendix C).</p> <p>The masterplan (Appendix B) has been informed by Donnington New Homes' technical team and proposes housing on land at Smitham Bridge Road and allotments at Marsh Lane. The proposed density is reflective of the local area and would provide approximately 34 homes, including affordable housing, making a valuable contribution to the housing requirement, in a sustainable location.</p> <p>There are no environmental constraints on the site and its development would allow the early delivery of housing in the Plan Period.</p> <p>Whilst Donnington New Homes recognises that the allocation of sites in Hungerford is to be addressed through the emerging Neighbourhood Plan, the purpose of this section is to illustrate that in increasing the housing provision across the District, there are suitable, available and achievable sites (not already allocated) that could deliver housing in the early years of the Plan period, in a sustainable manner and in accordance with the spatial strategy.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Appendix B - Illustrative Masterplan • Appendix C - Submission to Hungerford Neighbourhood Development Plan
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	<p>No</p>

* Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<i>Extract of full response relevant to consultation point.</i> The primary amendments necessary for the Submission Plan to be found found and to meet the Legal Compliance tests are summarised as: <ul style="list-style-type: none"> The allocation of further sites to enable a rolling five-year housing land supply, maintained over the Plan Period, of which Donnington New Homes' promotion site at Smitham Bridge Road for approximately 34 new homes and Marsh Lane for allotments, is a prime example of the suitable, available, and achievable sites that can come forward.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Trustees of Allan Snook Will Trust (Represented by Pro Vision)
Consultee Full Name	Trustees of Allan Snook Will Trust
Consultee Organisation	Trustees of Allan Snook Will Trust
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS665
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:51:00
Attached Files	PS665 Pro Vision (Allan Snook Will Trust) Dev Ops Plan.pdf PS665 Pro Vision (Allan Snook Will Trust) Location Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><i>Omission Site</i></p> <p><u>Land south of Recreation Ground, Boxford and Site Assessment</u></p> <p>In the context of the concerns about the vulnerability of the submitted development strategy, and the obvious remedy to identify a greater yield of new homes from the available sites in the HELAA, we turn to our client's land which was overlooked ('Land south of the Recreation Ground, Boxford (HELAA Ref: BOX1)').</p> <p>The Council's HELAA document concludes that the site is 'not developable within the 15 years'. The Council contend that development would be inappropriate in the context of the existing settlement form and pattern. Furthermore, development would fail to conserve and enhance the AONB. We disagree with this assessment/conclusion for the reasons set out below.</p> <p>The appended Development Opportunities Plan demonstrates that our client's site in principle could accommodate around 20 new homes.</p> <p>The Boxford Parish Plan is in the process of being updated, however the 2008 report noted significant support for a need to deliver affordable housing for young local people and for local elderly people. This can only be secured through the allocation of reasonable scale development at Boxford.</p> <p>The Development Opportunities Plan demonstrates that the northern part of the site could deliver a significant area of new green infrastructure. The use of this green space is open to further discussion with the Boxford Parish Council but could offer for example: public open space, a community orchard & garden, allotments, wildlife areas , or new children's play equipment (such as a skate park).</p> <p>The Boxford Parish Plan also comments that the "the parish is divided and has no social centre". Furthermore, residents raised that there is a need to improve access from the village to the community facilities at the recreation ground. The development of BOX1 would help to deliver this aspiration by providing an improved pedestrian and cycle link to this 'Community Hub'. In addition, the potential of the site to deliver new green infrastructure provides a unique opportunity to extend this community space to create a green 'social centre' to the village that can be used by all age groups.</p>

	<p>Suitability of BOX1</p> <p>The Council's HELAA document states that the AONB Officer has concerns that any development would create a hard edge to the village which would suburbanise the rural character and impact on the AONB. However, it appears the Officer has not considered the Development Opportunities Plan.</p> <p>Whilst the site and Boxford lie within the AONB, the Development Opportunities Plan demonstrates that the residential development would be located to the south of the site, immediately adjacent existing residential development. The proposed new Green Infrastructure to the north would also provide a transition between the built-up area of the village and the wider landscape. Indeed, it is considered that a landscaping buffer could help to break up views and soften what can be seen of the built development. Notwithstanding the above, the proposed development would strongly relate to the existing settlement pattern and is visually and physically well contained. Therefore, the development of this site would form a logical extension and any built development would be seen in conjunction with the existing residential development to the south and east. Accordingly, we are of the view that the Council should consider the allocation of BOX1 in the Local Plan Review in accordance with the objectives of paragraph 79 of the Framework and to help strengthen the district's housing supply.</p> <p><i>Attachments:</i></p> <ul style="list-style-type: none"> • <i>Development Opportunities Plan</i> • <i>Site Location Plan</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>In the context of the concerns about the vulnerability of the submitted development strategy, and the obvious remedy to identify a greater yield of new homes from the available sites in the HELAA, we turn to our client's land which was overlooked ('Land south of the Recreation Ground, Boxford (HELAA Ref: BOX1)').</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Jones, R.L.A (Represented by Carter Planning Ltd)</p>
<p>Consultee Full Name</p>	<p>Mr R.L.A. Jones</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	<p>Mr Mark Carter</p>
<p>Agent Organisation</p>	<p>Carter Planning Limited</p>

Comment ID	PS1141
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Objection Policy SP15 should be amended to delete RSA14/RSA22/HSA19 Lynch Lane Lambourn and RSA15/RSA23/HAS 20 Newbury Road, Lambourn. The Section is entitled "Delivering Housing". Despite being allocated in April 2017 there is no sign of either site coming forward with no planning

applications being made in respect of Lynch Lane. It is not clear what is happening with Newbury Road. Firstly planning permission was refused, then planning permission was granted for eight houses but these are not being pursued. If permission has been granted the site should not be included. However there is also an application for five units on the site further adding to the uncertainty about its delivery.

Policy HSA 19 Site LAM005 Lynch Lane, Lambourn

Our Clients have made representations elsewhere that the housing provision in the Plan is inadequate and extra sites should be included, in particular our Client's Site LAM007.

However if the Inspector considers that extra sites are not required then LAM007 should be included instead of sites HSA19 or HSA20, in the Submission LPR document.

HSA 19 has the disadvantage of being a very large site for the village to accommodate. The capacity of the site has risen arbitrarily since the 2014 Preferred Options document and yet the constraints have increased. Notwithstanding this the text has been altered to reduce the size of the site. It lies alongside an SSI/SAC and part of the site is liable to flooding from the River Lambourn which flows along the northern boundary. No work seems to have been carried out on a number of aspects including archaeology, nutrient neutrality. It appears that the site capacity has arbitrarily increased by 4 units from 56 in the 2014 document to 60 in the current document merely so that, together with Newbury Road, it tries to compensate for the unjustified omission in this version of the Plan of site LAM007 which was previously included. Since its allocation in the previous adopted Local Plan there is no evidence that it is coming forward and is deliverable.

The Summary of Lambourn Sites SA/SEA page 122 notes the negative points in relation to environmental sustainability and flooding. The need for a buffer zone and the inability to develop within the flood zone appear to reduce the size and capacity of the site and not to increase it as is again arbitrarily suggested (from 56 to 60) in the previous Submission LPR.

The Parish Council within their response with regard to LAM005 included the following key points:-

"Environment -the site is within the AONB. The site is immediately adjacent to the River Lambourn, the corridor of which is a Site of Special Scientific Interest.

Housing and the Community – Lambourn needs a period of consolidation to adjust to the social impact resulting from recent rapid growth.

Industry – impact on the racehorse industry– safety of horses and riders will be affected by increased traffic generation

Archaeology – Lambourn formed part of the parkland of Lambourn Place, and the site is believed to be a site of a Saxon palace. Any development would destroy this.

Roads – roads are narrow, with blind bends and dangerous junctions. Inadequate footpaths and the roads are busy. Any increase in traffic will be detrimental to the safety of the road users".

These matters have not been addressed.

The Lambourn Site Assessments document, in its summary notes that "the Parish Council had various concerns about this site, as does the local community". Indeed this was the least favoured site for development by the residents responding to the survey that this site

The Plan's approach to the selection of sites is not justified or consistent with other policies of the LPR.

Policy HSA 20 Site LAM015 Newbury Road Lambourn

HAS now has planning permission for eight units but this is not being pursued. It should not be included if it has planning permission. It is assumed that it is being included as there is a current proposal for eight units.

Policy HSA 20 and in particular site LAM015 should be deleted and replaced by previously preferred Option Site LAM007.

HSA20 or LAM015 is a very small, inflexible site and makes little contribution to housing supply (five dwellings). It appears to have been included (and the notional capacity of LAM005 increased) merely so that LAM007, previously included as being acceptable, can be excluded.

HSA20 or LAM015 was not examined in the West Berks Landscape Sensitivity Assessment by Kirkham Landscape Planning.

The reference to the site in The Lambourn Site Assessment was both cursory and inadequate. The Parish Council were consulted about its inclusion (apparently it appears neither were statutory consultees).

HSA 20 scores poorly when compared against the criteria in Appendix 2 for the settlement boundary review. It is accepted that it forms an extension of the existing settlement boundary and is located on a ridge etc.

HAS 20 was selected at a late stage during processing of the Local Plan and yet has no identifiable feature to create its northern boundary which is open and on a ridge contrary to Criteria used in the Review at Appendix 2 of the LPR. There is no landscaped boundary contrary to other Criteria. It is on a ridge contrary to another Criteria and can be described as an open area on the edge of the settlement seen at the entrance to the village, contrary to yet more Criteria. It also lies close to the Medieval Village of Bockhampton.

Lastly planning permission has been refused for the development of the site, then permission granted for eight units but no longer being pursued and so there is no evidence it is deliverable or will provide the certainty that the LPR requires.

Policy HSA 20 should include site LAM007 instead of HAS 20 (LAM015).

The LPR's approach to the selection of sites and the review of settlement boundaries is not justified or consistent with the LPR.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	Please see other submissions on this specific point <See Rep ID: PS1170>
4. Proposed Changes	<p>Policy SP15 should include the site known as LAM007 instead of HSG 19 and HSG20.</p> <p>The LPR's approach to the selection of sites is not justified or consistent with the LPR. Further the detailed examination of Site HSA 19 means that it may not be delivered or may only delivered with reduced capacity. Our Clients would prefer that Site HSA19 is omitted. However if there is a need for additional housing following the inclusion of site LAM007 then a more realistic appraisal of the "parameters" should take place to ensure that the LPR is both sound and effective</p> <p>Site HSG20 should be omitted. It has been refused planning permission and did not go through the rigorous consultation process or selection procedure applied to other sites such as LAM007. Its impact on the landscape was not been adequately assessed. It is further from services than LAM007 and has a number of other disadvantages landscape and other.</p> <p>The inclusion of HSG 20 would undermine the Plan and would mean that it is both unsound and ineffective.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We do not consider the LPR is sound and would like to participate in the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS836
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point. SP16 – SITES FOR NWD AONB No Comment as all made under SP12.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Parker, Charlie (Represented by W S P Group plc)
Consultee Full Name	Mr Charlie Parker
Consultee Organisation	
Agent Full Name	Aaron Peate
Agent Organisation	W S P Group plc
Comment ID	PS1057
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>We write on behalf of <i>[personal details removed]</i> the owner of Windsor House Paddocks in respect of West Berkshire Council's (WBC) Local Plan Review Proposed Submission (Regulation 19) document which is currently out for consultation.</p> <p>Our client has been promoting the Windsor House Large Paddock site for some time and maintains that the site represents a suitable site for housing development and should be allocated in the emerging Local Plan. We have also been promoting the site through the Lambourn Neighbourhood Development Plan. In summary, these representations highlight that:</p> <ul style="list-style-type: none"> • The entire large paddock site should be allocated for housing and included within the settlement boundary of Lambourn. This is because as previously highlighted, the surface and groundwater flooding experienced by the site can be mitigated for; • An interim development proposal for large confines of the site which are not subject to flood risk could be brought forward in the short to medium term, prior to more detailed mitigation measures in order bring forward the rest of the site; • The current allocations in the area do not take into account previous under-delivery of housing sites in Lambourn; • The site provides a unique opportunity to deliver affordable housing for local needs, such as those working in the racehorse industry; and • The lack of flexibility within Policy DM37 for discontinued horseracing uses and recognition of the wider role that appropriate housing has to play in supporting the local economy and thus the industry as a <p>We also have concerns relating to the housing numbers proposed for the North Wessex Downs AONB and Lambourn in particular as we believe both are too low.</p> <p>All of the above, either individually or cumulatively mean that the draft Regulation 19 Plan is not 'sound' as it is not justified or effective as required by the National Planning Policy Framework (NPPF) (2021). Our key concerns with the Draft Regulation 19 Plan and our suggested amendments are outlined below.</p> <p>Section 8 Sites Allocated in North Wessex Downs AONB</p> <p>The council should reconsider their selection of housing allocations within Lambourn and include the Windsor House Paddocks site (LAM5).</p> <p>This site would perform better environmentally speaking than the two allocated sites in Lambourn, due to its well contained position in terms of surrounding patterns of development and positioning further away from the Lambourn River SSSI/SAC. Localised surface water flooding issues can be successfully mitigated against in the short term through locating dwellings on portions of the site which are not susceptible to this localised flooding, of which a significant number of dwellings could still be accommodated. In the medium to long term, well established mitigation measures can be put in place</p>

which could unlock greater proportions of the site to bring forward more housing, which would be valuable in delivering upon housing need in the area on a well contained site close to the village centre.

We would urge the council to revisit the 2014 Housing Allocations DPD representations for this site, where detailed work was undertaken by our client's Flood Risk Consultants including engagement with Stuart Clarke, West Berkshire Flood Engineer, where a variety of options have been discussed in resolving these flooding issues. It is clear from these representations, that the issue of flooding can be overcome.

It is also disappointing to see that two previously undelivered sites have been rolled over to the Regulation 19 Plan without the addition of any other allocations in the village to appropriately take into account previous under delivery. These two sites were allocated in the Housing Site Allocations DPD in 2017 and remain undelivered more than 5 years later. Land adjoining Lynch Lane, which is allocated for 60 units, has not received planning permission since its allocation and whilst Land at Newbury Road (allocated for 5 units) received planning permission in September 2021, this permission has yet to be implemented and will lapse in under a years' time.

There is no immediate indication that these sites will be delivered in the near term, therefore they are not addressing current and growing housing needs in the area. This is exacerbated by that fact that West Berkshire's 5 year housing supply has decreased from 7.34 years in 2021 to 6.4 years in 2022, as reported by the council's Annual Monitoring Reports.

There is a short term solution to delivering housing on the Windsor House Paddocks site.

It is also recognised that Lambourn has a thriving racehorse training industry that must have continued support. The importance of this industry is recognised in Policy DM37. With many people employed in the equestrian industry, often on low pay, there is an acute need to provide market and affordable housing. Our client is exploring the ability to accommodate a number of units to be made available specifically for local people working within the industry. A development on the site could therefore provide for a local specific need that may not otherwise be met by the other allocations, complying with the spirit of Policy DM37 which affords support to this industry which is intrinsically linked to the vitality of this rural service centre.

As has previously been put forward, the Paddocks have not been used for racehorse training purposes for a number of years and the land is therefore underutilised.

This has occurred for practical reasons in terms of providing ample space for the training of these horses and other associated buildings required, as well as logistical issues associated with transporting yearlings in the village to the training uses in Upper Lambourn, along busier roads in the centre of the village. The Paddocks are therefore becoming increasingly disconnected from the cluster of racehorse training uses and facilities located in Upper Lambourn and is unlikely to be used again for these purposes due to this.

The provision of housing on the site would contribute towards the continuing vitality of the settlement as well as maintaining an onsite link to the race horing industry by providing affordable housing for workers in this field.

In addition to this, the development of the site could also provide benefits to the local area that the other sites could not, including:

- Opportunities to make improvements to the surface water and groundwater flooding concerns within the local area (through onsite improvements as well as S106 contributions to offsite improvements);
- Improved footways in the immediate vicinity of the site to enhance accessibility to the village centre;
- Improved sight lines at the Crowle Road/Baydon Road Junction; and
- Provision of a bus layby to facilitate safe and efficient school drop

The Windsor House Paddocks Site (LAM5) should be included as a site allocation in the Draft Regulation 19 Plan. The site performs well and can provide tangible benefits to the village in the short term, through the provision of affordable housing units for workers in the racehorse industry.

Section 6 Delivering Housing

We have criticisms of the draft Local Plan in relation to the residual requirement for the North Wessex Downs AONB area, and the balance of this area requirement planned for in Lambourn. These criticisms mean that the draft Local Plan is not sound as it does not properly meet the housing requirements for the District, and is not the most appropriate strategy based on the evidence available.

Lambourn Housing Allocation

Given the Lambourn's relative size compared to Hungerford and Pangbourne, the other two Rural Services Centres in West Berkshire, and the unique requirements to provide housing for the racehorse training industry, the number of houses identified in the village is disproportionately low.

Hungerford has a population of circa 5,500, Lambourn circa 4,000, and Pangbourne 3,000 people. Despite Lambourn being only 30% smaller in population terms than Hungerford, Hungerford's housing allocation of over twice as high as the housing numbers identified for Lambourn. Lambourn's proposed allocation is more akin to Pangbourne's, even though the settlement is 25% smaller in population terms than Lambourn. This is only one indication of what a proportionate housing allocation should be but is telling.

To add to this, it is recognised that Lambourn has a thriving racehorse training industry that it must continue to support. With many people employed in the equestrian industry, often on low pay, there is an acute need to provide market and affordable housing. This housing need is not present in Hungerford and Pangbourne.

For the reasons set out above, more land for housing should be identified in Lambourn. The Windsor Paddocks site could provide between up to 50 houses. This would take the overall housing numbers proposed for Lambourn over the next 12 years up to 115-130, which is a more proportionate given the size and unique needs of the town.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn Business Park (Represented by Savills)
Consultee Full Name	Lambourn Business Park
Consultee Organisation	Lambourn Business Park
Agent Full Name	Ms Catherine Mason
Agent Organisation	Savills (UK) Ltd
Comment ID	PS1034
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:38:00
Attached Files	PS1034/PS1039 Savills obo Lambourn Business Park_cover letter REDACTED.pdf PS1034/PS1039 Savills obo Lambourn Business Park_location plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>[See attached documents Lambourn Business Park cover letter and Lambourn Business Park location plan]</p> <p>West Berkshire Local Plan Review 2022-2039 – Proposed Submission Version (Regulation 19) Representations on Behalf of Lambourn Business Park</p> <p>On behalf of Lambourn Business Park, we write to submit representations to the West Berkshire Local Plan Review 2022-2039 Proposed Submission Version.</p> <p>We support the general thrust of the plan and approach to development, however, it is our view that our client's site (land adjacent to Lambourn Business Park) represents a suitable and deliverable site for housing and should therefore be included within the non-strategic site allocations identified under Policy SP15 and Chapter 8 for the North Wessex Downs AONB Area. This amendment will result in a plan that is positively prepared, justified and effective and will ensure that the housing targets for the North Wessex AONB Area are achieved.</p> <p>This site (1.9 hectares) could deliver a high quality development which makes efficient use of the land and should be included for the reasons set out below. The site has also been submitted as a potential housing site in response to separate consultation in respect of the Lambourn Neighbourhood Development Plan.</p> <p>In order to be found sound at Examination in Public, the policies in the draft Local Plan need to comply with the tests of soundness set out in paragraph 35 of the NPPF (July 2021). The plan must be:</p> <p>"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p>

- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.” (author’s emphasis underlined).

Policy SP3 of the emerging Local Plan identifies Lambourn as a Rural Service Centre offering development potential appropriate to the character and function of the settlement.

Policy SP1 of the emerging Local Plan identifies the spatial strategy for West Berkshire to:

- Direct development to areas of lower environmental value;
- Optimise the use of previously developed land; and
- Optimise the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment.

Policy SP2 of the emerging Local Plan (North Wessex Downs AONB) states that the North Wessex Downs Area AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.

The proposed site offers the potential to deliver housing in accordance with emerging policies SP1 – SP3 for the following reasons:

- The site is ‘wrapped around’ by other parts of the business park (see below). There is built development on three sides and a number of established buildings on the fourth. Therefore the development would be ‘infill’ development that could be incorporated into the existing surrounding built form without any westward incursion into the countryside beyond the existing built form of the business park.

[See image within attached Cover Letter]

- Today, Lambourn Business Park (to the east and south of the site) is established as a location for office / industrial and storage use and designated as a Protected Employment Area in the Council’s Local Plan. The proposed site benefits from an extant planning permission (11/01822/OUTMAJ) for commercial development but remains vacant (see approved layout below). The approved buildings are single storey and do not make efficient use of the site. The site has been marketed but commercial development is not viable at the current time. However, the planning permission remains ‘extant’ which means it could be built in the future if market forces change.

[See diagram within attached Cover Letter]

- Up until now the site has been underutilised, considering its historic use and long-established planning consent for redevelopment. Aside from the site’s position within a designated AONB there are no other known constraints to development. The site is positioned within an established business park with an extant planning consent for commercial development and is not considered to make a positive contribution to the AONB.
- Through a landscape-led approach to layout, scale, density and design the development offers the opportunity to make a positive impact on the landscape.
- Buffer planting will serve to soften and screen the development from the adjacent business park and surrounding landscape alongside additional opportunities to ‘green’ the site through play and drainage features.
- The proposals seek to deliver up to 25 new homes (see sketch below). The development would offer a range of housing types and tenures, informed by local housing needs. It would include affordable housing.

[See image within attached Cover Letter]

- Mixed use development would add vitality to the business park, particularly at evenings and weekends. Night-time activity would naturally add security and safety to the business park. None of the existing activities at the business park would preclude adjacent residential development.
- Access would be provided via the existing and retained business park to the east, along the Public Right of Way which dissects the site.
- The site could come forward independently or as part of a wider site incorporating land to the west (which already has some limited buildings) within the plan period, subject to the needs of existing businesses currently located on the site. As part of the wider site, this could deliver a meaningful contribution to the housing targets for this spatial area with limited impact on the AONB.
- The site (including the wider site) is within a single ownership and is available immediately for development.

Allocation of this site within Policy SP15 of the Local Plan will accord with emerging policy SP1 of the Local Plan on the basis that the site benefits from an extant planning permission and is therefore tantamount to previously developed land, it represents an opportunity to make a positive impact on the landscape and AONB and would make efficient use of the land (unlike the extant planning permission).

	<p>In order to ensure that the Local Plan is effective and justified, and ultimately sound, this site should be included within Policy SP15 the Local Plan as a non-strategic site allocation in the North Wessex AONB.</p> <p>If the Council and / or appointed Inspector wanted to consider a larger housing allocation then our client would be open to considering residential development on the wider site in their ownership (see attached location plan showing the proposed site in red and wider land ownership in blue).</p> <p>We request to be kept informed as the plan progresses and would like to participate in the Examination Hearing sessions to ensure our client's case is fully understood.</p> <p>Please do let us know if you have any queries or would like to discuss.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Inclusion of the site as non-strategic allocation within Policy SP15 in order to ensure the plan is positively prepared, effective and justified. See attached representation for full details.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Berkshire Oxfordshire Bucks Integrated Care Board
Consultee Full Name	BOB Integrated Care Board
Consultee Organisation	BOB Integrated Care Board
Agent Full Name	Helen Clark
Agent Organisation	
Comment ID	PS1135
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 17:25:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<ul style="list-style-type: none"> Policy SP15 (Sites allocated for residential development in North Wessex Downs AONB) states inter alia that 140 units will be provided at Compton (HAS 23), 60 at Lambourn (HAS 19) and 49 at Hermitage (HAS 24 and RSA 22). It is further noted that in the current (2016) iteration of the West Berkshire IDP, that within the table on page 60, "Improvements to GP premises in area of development. Approx additional 50 sq.m" are described as being required to mitigate housing growth at "AONB (Hungerford, Lambourn, Pangbourne)". This Table indicates that this 50 sq m is a collective total of new floor space that should be paid for by developer contributions at a cost of £150,000. The ICB's view is that the 50 sq m currently articulated should be described as a net (as opposed to gross) floor area. Furthermore, as 50 sq m net space would cost around £350k to build as at Q1 2023 prices, not £150k as stated. The ICB considers that if developer contributions were sought that amount to £350k, this would be sufficient for the local GP Practices to deal with the additional capacity, either through 50 sq m of additional space, or through the provision of internal modifications to create additional clinical/patient-facing space.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	CALA Group Ltd (Represented by Pro Vision)
Consultee Full Name	Mr Paul McCann
Consultee Organisation	CALA Group Ltd
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS1216
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:03:00
Attached Files	PS1215 Pro Vision (CALA Group) (Hungerford)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	No

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>Extract of full representation relevant to this consultation point. For full representation see attachment. Footnotes are included in the attachment.</i></p> <p>Strategy for the North Wessex Downs Area of Outstanding Natural Beauty (AONB)</p> <p>Policy SP15 identifies a total of 414 homes for the AONB over the plan period (including a proportion which will need to be found through neighbourhood plans). This equates to around 4.5% (footnote 8) of the housing provision for the district.</p> <p>Policy SP15 includes deferring the identification of specific sites for the requirement in Hungerford and Lambourn to the respective emerging neighbourhood plans.</p> <p>Whilst we have no objection to this approach, and indeed, CALA has been actively engaged in supporting the Town Council's work on the Hungerford Neighbourhood Plan, what is missing is a contingency in the event that, for whatever reasons, the neighbourhood plan process does not succeed as expected. The process has inherent uncertainty within it, not least the public referendum stage.</p> <p>Therefore, the LPR should include a contingency whereby it is clear what the alternative is if the neighbourhood plan process does not work out as expected (footnote 9).</p> <p>An obvious option would be to include a time limit within the LPR for sites to be identified and confirmed as allocations (the South Oxfordshire Local Plan provides a local precedent for this) (footnote 10).</p> <p>Although the LPR is expected to be reviewed on a 5 year basis, deferring the contingency to these reviews risks significant delay in meeting identified needs. A positive planning approach would be to include the contingency in the LPR (involving a modification to Policy SP15 and the supporting text, including paragraph 6.40 and 6.41).</p> <p>On a side point, we would also note that there seems little (if any) purpose to listing the Compton and Hermitage Neighbourhood Plans in policy SP15, which is about site allocations in the AONB area. Both are now listed as providing no additional homes.</p> <p>Local housing need in the AONB and specifically in Hungerford</p> <p>A stated priority for the LPR, set out in the Vision, is to address affordability of homes for the local population (footnote 11).</p> <p>As addressed in the previous section, the proposed spatial strategy makes policy decisions about how to apportion the development needs across the spatial areas. "Modest", or more accurately, very modest, growth is proposed to be directed to the AONB area.</p> <p>Specifically within Hungerford, the main settlement of the AONB area, what does the evidence base say about local need?</p> <p>Affordable housing</p>

In terms of the published evidence base, noting that the Strategic Housing Market Assessment has not been updated since 2016, a key evidence document for the LPR is the Updated Housing Need Evidence (UHNE) , covering the period 2021 to 2039, which provides information on the need for affordable housing.

This report does not appear to drill down to specific settlements, but does give useful information of need by spatial area.

The UHNE identifies a need for 152 affordable and social rented homes per annum in the AONB spatial area, and a further 160 shared ownership homes. In both cases , the level of need is noticeably higher in the AONB part of the district than the other sub-areas.

This equates to 46% of the overall need for affordable and social rented homes in the district (footnote 12) and 43% of the shared ownership need in the District (footnote 12).

This need is described as “substantial” and “the Council is justified in seeking to maximise the provision of affordable housing on eligible development sites, subject to viability” . However, the proposed scale of the district’s growth directed to the AONB is less than 5% (as explained in the previous section).

Indeed, the report invites the Council to “consider through plan-making process whether higher housing provision would have positive benefits on affordable housing delivery” .

Noting the proposed spatial strategy is for 500 homes in total (open market and affordable) across the spatial area, there is no prospect whatsoever of the need being met through this plan. The LPR will inevitably fall well short of meeting the need, especially in the AONB spatial area, with significant social and economic consequences.

Need in Hungerford

There appears to be no published evidence behind the LPR on specific need for Hungerford.

We assume therefore that local level need is being deferred to the neighbourhood plan process, which is well underway, led by the Town Council.

Therefore, it is relevant to turn to the evidence base supporting the emerging Hungerford Neighbourhood Plan (HNP).

A report into development need was published in 2019 by Aecom to inform the HNP (a copy is provided in appendix B).

At paragraph 3, it is reported that the Housing Needs Figure (HNF) for Hungerford is 27 net additional dwellings per year, equating to a total of 486 over the Plan period (2018 to 2036).

We note that the LPR plan period has been delayed by a couple of years, but not so significantly to mean that this independent calculation of need is no longer accurate or relevant. In need, if anything, the need is likely to have increased.

Further, it is reported that “There is a **severe lack of suitably affordable houses** for the population of Hungerford, and **every effort** should be made to maximise AH provision going forward...” (Our emphasis).

The Aecom report goes on to note that the HNF is an “upper-bound target that is subject to supply of suitable sites” i.e. that supply of suitable land will be a significant factor in what is a realistic housing target for the settlement. CALA has been cooperating with the HNP process to allow for detailed assessments of available sites.

In accordance with the NPPF, preparation of the HNP has been delayed until a housing requirement is identified through the Local Plan.

The requirement proposed in the Regulation 19 LPR, Policy SP15, is 55 dwellings. That is some 431 fewer than the settlement specific assessment of need. In other words, the proposed requirement for the HNP, if adopted, is just 11% of specific need identified for the town.

Even if you were to include the 100 homes allocated (and now being delivered) under HSA18, the shortfall is substantial at 331 homes (i.e. providing for only 32% of need).

It is not clear in the evidence if site availability has been a factor in the proposed housing requirement, or whether it is a top-down figure based on a proposed spatial strategy of very significant constraint to development in the AONB over the plan period.

It would certainly be appropriate, indeed essential, for the requirement to be tested against the realistic site capacity in the town, which the HNP process is in the process of doing.

As it stands, unless there was clear evidence that capacity was so constrained that no more than around 55 homes could be achieved, the proposed LPR will make a significant contribution to exacerbating housing need in the community.

The implication of such a policy approach is likely to be new households, for example, new families, having to leave the town, with implications for the social fabric and sustainability of the community.

There is evidence to strongly indicate that there is significantly greater capacity in and immediately around the town. Sites HUN12 and HUN14, for example, could potentially deliver in the order of 150 homes immediately adjacent to the current settlement boundary.

In brief summary, initial assessment of the sites for the HNP, and in parallel through the HELAA, has raised no insurmountable constraints to development, albeit both sites, but HUN12 (West of Salisbury Road) in particular, would require careful, landscape led master planning to mitigate impacts in the landscape. The site assessment recognises that specific landscape assessment is required to fully test the site capacities.

The LPR however provides no incentive for the Town Council to look more keenly for available land given the very modest requirement of 55 homes over the plan period. It is evident that the Town Council, quite understandably in some respects (despite its own evidence of local need), is restricting the extent of its growth ambitions.

	<p>Noting the relatively prominent status of the town in the district's settlement hierarchy (the main Rural Service Centre in the AONB), and the evidence of local need identified by Aecom, there is clear justification for further growth, without necessarily compromising the designated landscape.</p> <p>A greater level of positively planned development for the town is likely to help reduce the potential for more ad hoc growth in the AONB area under exceptional circumstances. A shortfall in housing supply during the plan period, escalating affordability issues, and/or growing constraints for development elsewhere in the district (such as the phosphates issues in the Lambourn catchment [Policy DM6, water quality] and the DEPZ constraints [Policy SP4]) could soon put pressure on additional growth in settlements in the AONB.</p> <p>In summary we are confident that there is greater capacity for more development in Hungerford than the proposed housing requirement (55 homes), and it is the arbitrary LPR requirement that is constraining sustainable growth. Positive planning would involve the LPR looking again at opportunities in the town.</p> <p>The proposal to constrain the amount of development in the AONB, and Hungerford in particular, is likely to have significant social and economic impacts. Whilst it is more than likely that meeting the housing need in full would challenge the overarching objectives of the AONB to conserve and enhance the special landscape, <i>a more balanced approach to meeting the three strands of sustainable development is needed, including the social element that Aecom's evidence highlighted was so important. This would be in keeping with the spatial strategy for the AONB (Policy SP2), which recognises that development is required in the AONB to support its local communities and rural economy.</i></p> <p>Attachments: full representation including appendix A and B</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	To examine our objections to the development strategy
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited

Comment ID	PS1140
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	Carter Planning (Mr RLA Jones).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>Omission Site</i> Include "Land between Folly Road, Rockfel Road and Stork House Drive" (SHLAA site reference LAM007) in the LPR._

In the West Berkshire Housing Site Allocations Development Plan Document - Inspector's Report March 2017 by David Hogger BA MSc MRTPI MCIHT he stated:-

“88. Another site in the settlement between Folly Road and Stork House Drive (LAM007 in the SHLAA) displays similar characteristics to the allocated site at Lynch Lane. However, the proposed allocation is sound and there is no justification at this time for allocating further development within the AONB because the limit of 2,000 dwellings, as set out in the CS, would be significantly breached. I note, however, that there is a commitment from the Council to reconsider this site as part of the WBLP preparation”.

This has not been done and the site has not been included in the Draft Plan.

To ensure Section 8 Policy RSA is justified, sound and effective, Site LAM007 should be restored to the Plan (in place of site RSA23/HSA20) as previously suggested in the July 2014 Preferred Options Draft in the text of the Plan and in the settlement boundary review as follows:-

"Policy RSA ?? - Land between Folly Road, Rockfel Road and Stork House Drive (SHLAA site reference LAM007)

Just over one hectare of this site is considered to be developable for approximately 24 dwellings. The developable area excludes the middle section of the site, reflecting the outcome of the Landscape Assessment which indicates that development on part of the site would be acceptable as long as the required mitigation measures are adhered to.

The site is well related to the existing settlement and close to local services, facilities and open countryside. It is proposed that the site is allocated for low to medium density development, with a mix of dwelling sizes and types including affordable housing. Access can be obtained either from Folly Road or from Rockfel Road, with a potential additional pedestrian access onto Holly Road.

Full ecological and archaeological surveys will be required to inform any development proposal."

<for site map see attachment>

Background

Our Client, Mr R L Jones has been involved in the equestrian industry in Lambourn for many years.

The representations by Carter Planning Limited on his behalf (and on behalf of his family and Company interests) seek to demonstrate that the Draft LPR is fundamentally unsound because it underestimates the required housing provision generally. as a result it produces too few housing sites to meet needs or be flexible.

More specifically our Client takes exception to the failure by the Council to consider site LAM007 despite the Council making a commitment to do this at the last Examination and despite its late omission from the current Plan which has previously been through consultation and examined in detail and found to be acceptable (and its replacement by Site RSA 23/HAS 20, formerly LAM015 which had not).

This failure undermines the Council's stated criteria for the selection of sites and settlement boundaries in the rest of the Draft Plan.

Our Clients representations therefore seek to increase housing which in turn means and increase in housing sites. As a result either the addition of SHLAA site LAM007 as having previously been acceptable in all regards to meet this need, or, if the Inspector reduces the housing need then the replacement of site RSA 23/HSA20 by site LAM007 (and a re-examination of the allocation and capacity of Site RSA 22/HSA19).

Site LAM007 is located in an area where recent development has occurred over time. It is well located in relation to the heart of the village and is contained by development on three sides. It is a site which can be flexible in the amount of development which it supplies.

In respect of site LAM007 the Council's Draft Plan (LPR) is neither positive nor justified, in that LAM007 is totally and promptly deliverable and consistent with national policy, which may not be the case with other sites.

Facts and experience show that, contrary to assertions made by the Council and others previously, mixed housing can be provided on site, LAM007, in a manner that is beneficial to the community and horse racing industry, in contradiction to those claims.

It is still not clear why Site LAM007 was suddenly excluded from the last Plan and site HAS 20, LAM015 included and HAS 19, LAM005 enlarged. It seems likely that this is only due to incorrect evidence regarding our Clients' adjoining stables. see below.

LAM007 was previously included as a preferred site in the 2014 Consultation Issues and Options Draft when the Council concluded:-

The principle -

The Core Strategy sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided.

The Core Strategy identifies Lambourn as a rural service centre within a Settlement Hierarchy. This means that Lambourn, along with the other rural service centres, has a range of services and reasonable public transport provision, with opportunities to strengthen its role in meeting the requirements of surrounding communities. As such, it is expected that Lambourn will accommodate some additional housing growth to 2026.

Policy ADPP5 sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Housing Site Allocations DPD will allocate non-strategic housing sites for development adjacent to the existing settlement boundaries of those settlements identified within the settlement hierarchy. As such a review of settlement boundaries will take place as part this DPD.

The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB. In order to ensure that the diversity and local distinctiveness of the landscape character is conserved and enhanced, the natural, cultural and functional components of the landscape character will be considered as a whole in accordance with Core Strategy policy CS19.

One of the consultation responses set out above outlines that '2 suitable sites have been discounted for no apparent reason'. Both these sites (LAM004 and LAM006) have been ruled out for landscape reasons. The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma) carried out a Landscape Sensitivity Assessment (LSA) on sites submitted within the AONB. This work concluded that both sites LAM004 (Land off Bockhampton Road) and LAM006 (Land at Wantage Road and Northfields) should not be pursued for development due to the landscape impact.

With regard to the housing type and mix, policy CS4 of the Core Strategy outlines the Council's approach and states that residential development will be expected to contribute to the delivery of an appropriate mix of types and sizes to meet the housing needs of all sectors of the community, having regard to the local context and relevant evidence sources.

The Council's Archaeology Team has been consulted on the site and has concluded that a variety of archaeological features are in close proximity and on the site resulting in a high archaeological potential. Further investigation and evaluation will be required through the production of Heritage Impact Assessment. This will need to be carried out as part of any planning application to inform the development of the site. Should the site be taken forward as an allocation within the plan this will be set out within an allocation policy.

The Council's Ecologist has been consulted and has concluded that the site is possibly Chalk Grassland. An extended phase 1 habitat survey would be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected. Should the site be taken forward as an allocation within the plan this will be set out within an allocation policy. The site is located over 600m (as the crow flies) from the River Lambourn, a SSSI/SAC, and it is essential that any development on the site will not adversely affect the SAC/SSSI.

The site is not within a Flood Zone and does not sit within an area of surface water flood risk. The site is located adjacent to a groundwater emergence zone but the risk of flooding on this site is considered low. Given the site is over 1 hectare in size a Flood Risk Assessment (FRA) would be required to support any planning application on the site in accordance with policy CS16 of the Core Strategy.

This site can accommodate up to 24 houses that will generate circa 144 daily vehicle movements including circa 14 during the 08.00 to 09.00 AM peak. It is considered that given the size of the development, the traffic impact from the proposal would be limited. Access can be obtained from Folly Road, but it probably wouldn't be appropriate considering the rural nature of the road. An alternative place for access would be via Rockfel Road. This would also connect the site to footways in the vicinity. There are currently no footways along Folly Road. A pedestrian access onto Folly Road would also be welcomed. There are footways and bus stops within the vicinity where bi-hourly services pass to Hungerford and Newbury. The site is also within walking and cycling distance of Lambourn centre.

Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) prepared alongside the Core Strategy considered all the infrastructure (including schools and doctors) that would be required to support the development of 10,500 new homes (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers to support the Housing Site Allocations DPD once the site allocations have been confirmed and any necessary infrastructure improvements will be taken forward.

Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL. Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.

In particular, consultation has taken place with Thames Water and they have not raised any concerns regarding water supply or waste water capability in relation to this site. It should be noted that infiltration of groundwater into the network has been identified as a strategic issue within Lambourn, therefore should development come forward on this site an integrated water supply and drainage strategy would be required.

The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB.

The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma Consultancy) has carried out a Landscape Sensitivity Assessment (LSA) on the site and recommended that only the land adjacent to Folly Road and below the 150m AOD contour in the south of the site be developed. Development on these parts of the site would be subject to a number of conditions, along with the protection and enhancement of key landscape features (set out within the LSA). The LSA also recommended that the larger sites within Lambourn, LAM005 and LAM007, are either only developed in part concurrently, or either one or the other selected, to continue the pattern of sequential small developments in the village.

A Landscape and Visual Impact Assessment (LVIA) would be required as part of any planning application for development on this site to ensure any proposed development conserved and enhanced the surrounding landscape of the AONB. The requirement to provide this work as part of a planning application

will be outlined within an allocation policy for the site should it be taken forward as an allocation within the plan.

The Council's Environmental Health Department has been consulted on the Housing Site Allocation DPD Preferred Options and will have further opportunity to comment throughout the process. No concern has been raised regarding this site. The site is at risk of groundwater contamination given the local aquifer and the level of risk and any necessary mitigation measures will be explored further through a Flood Risk Assessment to be provided as part of any planning application.

The racehorse industry plays a vital role within the local rural economy of Lambourn and surrounding areas. It is evident from the consultation responses that the site is currently used as turnout paddocks for an adjacent yard. As such the loss of the site for housing development would be contrary to policy CS12 of the Core Strategy. Policy CS12 aims to prevent pressure for redevelopment of existing facilities to other uses and the fragmentation of existing sites. Such pressures could lead to the decline of the industry locally, threaten the character and form of the settlement and increase pressure for replacement facilities in environmentally sensitive areas. Protecting yards from development for alternative uses is particularly important to the Council. **(Note this is incorrect for reasons given below).**

As part of the Housing Site Allocations DPD the Council will be reviewing the settlement boundaries of those settlements within the settlement hierarchy of the Core Strategy. Criteria for this review were consulted upon as part of the Preferred Options consultation in 2014.

Completed developments are already taken into account in terms of the housing requirement/numbers. Such areas of land adjacent to the settlement boundary will be considered further as part of the settlement boundary review

The site LAM007 was also comprehensively tested by Kirkham Landscapes in 2011 who concluded:-

"Relationship with adjacent settlement

The site is surrounded on 3 sides by housing, with 20th century medium density and more recent development to the north east and south east boundaries, and older, low density housing across the road to the north west

The lower density housing occurs up to the 170m AOD contour, with higher density on the lower slopes, below 150m. The site itself extends up to 170m AOD with the majority below 165m AOD

The site contains horse paddocks and stable buildings

Relationship with adjacent wider countryside

The site has some relationship with the countryside to the south west, which is a continuation of the east facing valley side, but hedgerows around and within the site, including a tall, conifer hedge disconnect the site visually from the countryside beyond

The site lies on slopes dropping into the valley and the settlement away from the extended wider landscape

Impact on key landscape characteristics

No woodlands are affected

Potential for replacing the incongruous conifer hedgerow with more appropriate planting

Other boundary hedges made up of native species are important features

Site currently in use as paddocks

Impact on key visual characteristics

Not typical of the wider LCA – less exposed and smaller in scale

Development of the whole site would be prominent in views from the surrounding Downs and from within the settlement

Impact on key settlement characteristics

Some appropriate development would not be out of keeping with existing settlement pattern

Summary of compliance with PPS7 paragraph 21

Development on part of this site, subject to the recommendations below, would result in little harm to the natural beauty of the AONB. It is recommended that only the land adjacent to Folly Road and below the 150m AOD contour in the south of the site be included

Our Client.

Our Client and his wife have lived in Lambourn for over 40 years, as a successful jockey and trainer, in the employ of others, and for the majority of that period, self-employed in the industry. During that period they have consistently used capital gained from housing development in Lambourn to heavily invest in the horse racing industry, including a new stables, upgrading another, provision of lads' accommodation units, lunging rings, a horse walker, an innovative paper bedding business, and other facilities. They currently have a planned programme of further development in the horse racing facilities within their ownership, including a potential new yard, upgrading of boxes, a lads' hostel and a manager's unit, which is being discussed with others, but this programme will not proceed without investment within their capabilities.

In previous submissions our Clients have consistently stated that the subject land is not part of any racing establishment, is in different ownership, and that the stables will continue. The land is agricultural.

Background.

After long periods of previous DPD consultations, including landscape, archaeological, highways, local community open day and parish council etc. assessments, and in the knowledge of horse racing issues during the consultation process the Council concluded in 2013 and again in 2014 that the site be considered a preferred site for housing development in Lambourn, subject to safeguards. This consideration was under LAM007. Our Client was notified in June 2015, that the preferred site status was proceeding to Council for confirmation in the progress to the EIP stage.

Suddenly, in July, 2015, the process was “pulled” and late in October 2015 our Client was notified that LAM007 was rejected in the recommendations for the DPD to be put before the Council on 5 November, 2015. The reason given was conflict with the Council’s Policy (CS12) of protection for the horse racing industry in Lambourn, as the retention of the site in such use is considered important to that industry.

On further investigation, our Client discovered that the tenant of Highview had submitted objections in or about September to the allocation, on the need of the site for “turn out”, and that with other objections about horses being on the land, caused the change. Our Client was unaware of these comments, and on 30 October his solicitor wrote to the Council requesting that the Council’s decision be deferred pending an opportunity to consider and reply to what had been said – “the right to reply”. It is also significant that the Council substituted the LAM007 site with a smaller linear development site at LAM015 (now HAS 20/RSA 23), which only entered the process very late in the day and had not gone through the same rigours of assessment that all other Lambourn sites have experienced.

The objection was spurious as “turn-out” land though useful, is not essential, and is not necessary in any case to “adjoin” stables. The tenant at Felstead (who is very successful) does not have it, it is not usual in Lambourn, and our Client has expert testimonials to this effect. Furthermore, the land excluded from the submission can still be used for grazing etc.

The Issues.

From the consultation documents and the papers before the Council on 5, November, 2015, it is evident that at every appropriate stage, including to the “stalled” recommendation stage in mid 2015, that LAM007 was a preferred site.

All the consideration parameters were, subject to safeguards considered positive and the conclusion of the SHLAA was “the site is proposed for a mix of dwellings and densities to suit the needs of the area”. It is significant that horse racing industry and highways concerns had been considered and dismissed in reaching the conclusion. 48% of respondents to Parish Council questionnaire favoured the site for residential development as their first or second choice.

Clearly something happened in the period from mid 2015 to the Council’s report in November, 2015, and those events were touched on by the last Inspector but in the absence of any explanation by the Council as to why an acceptable site had been dropped in favour of less favourable one(s) they appeared to us be:

- 1) Objections from a tenant and others relating to the horse racing industry issue;
- 2) The appearance in the document of a brand new site LAM015 in Newbury Road;
- 3) Highway comments;
- 4) A contention relating to the delivery of the site.

We address each issue in turn.

1 The Racehorse Industry.

This issue significantly rests upon the assertions of the tenant and others and ignores the history of the site’s previous submissions. Comments had been received by the Council on this subject before June 2015, and the Council had given LAM007 “preferred status”.

The planning basis for current omission of LAM007 is stated in the papers as Core Strategy Policy CS12. This policy is based on three core objectives :-

- Retention of suitable establishments/facilities;
- Resistance to permanent fragmentation;
- Redevelopment away from **essential** uses to the industry will be subject to suitability and necessity tests.

Fundamental to application of the policy is an understanding of the particular site characteristics and industry practice.

Our Client and his wife, through their interests have two yards, one at Felstead Court and the other at Highview in Lambourn. It should be noted that the subject land is not part of any racing establishment and in separate ownership from the adjacent stables of Felstead Court and Highview, which are in Company ownerships, and now let, having previously been operated by the Clients wife (as trainer) and himself until their retirement due to health and age issues.

Felstead Court, which is also subject to a tenancy, is larger and has no adjacent land within its agreement (more follows). The tenant of Felstead is very successful – hence the need for further investment in new and improved stables.

To the south of site LAM007 is a housing development (Rockfel Road), formerly part of the proposal land, on which our Client obtained residential permission via an appeal in the 1980’s. This land was subsequently built out by Westbury in the 90’s.

To the east of the site, at Stork House stables in 2002 our Client obtained residential permission, and separately, a new stables (i.e. the Highview) permission. Although the permissions are subject to S.106 Agreements, these agreements (relating to open space and jockeys accommodation at Highview) do not bind or enjoin site LAM007 in any way. The residential site was, subsequently, built by Bovis.

In addition, to the new Highview Stables, through our Clients’ companies, they have invested at the Felstead and Highview sites in a stable lads accommodation unit, a horse walker, and ancillary developments. They are currently planning further stables investments at Felstead, additional lads accommodation units and a new stables. So rather than destroying the race horse industry by seeking residential development, through their Companies, our Clients are one of the few in Lambourn to be heavily investing in it and have been able to do so because of the capital gained from gradual residential development.

The subject land LAM007 is not part of the Felstead Court or Highview stables ownership, is not necessary for the stables and is agricultural in use. In short our Client can plough it, or keep any animals for sustenance on it or grow crops on it.

Our Client is desirous of exploring the potential for either an alternative combined scheme (residential, stables, and lads units) or an alternative proposal including say, residential frontage development on the Folly Road frontage, with lads accommodation in the south eastern corner accessed of Rockfel Road, new stables at Felstead Court and a totally new stables in the north western corner.

The LAM007 land is agricultural, in accordance with the definition in the Town & Country Planning Act 1990. When our Client acquired the land from the Goulandis family trust it had been historically used for the grazing of pedigree cattle for sustenance and until three years ago it was intermittently used from Goulandis times by 3 local farmers for the grazing of sheep. All these animals grazed for sustenance from the land. Racehorses do not graze for sustenance as is explained later. To use land for the keeping of racehorses for commercial purposes is a separate user, which requires planning permission. There has never been a planning permission for such a use on the site, and to benefit from any lawfulness the horse related use would require 10 years of uninterrupted activity – 3 years is insufficient. Legally, there is no application of Policy CS12 to the land.

The main facilities required for the training of a racehorse consist of a well ventilated stable, good food, clean hay, bedding and water together with the ability of the trainer to exercise a horse safely on a sound surface as provided by the excellent public training grounds in Lambourn. Other facilities can also include horse exercisers such as walkers and turn out pens like those manufactured by Claydon. The Claydon Turnout Pens, as an example, are designed for restricted and controlled turnout in order to avoid horses galloping when they are shod with metal shoes on all four feet. The crucial factor is horses are at high risk of injury to themselves and to other horses if turned out on large areas, which owners, insurers and the like would not want. Racehorses in licensed training yards are there for the purpose of being trained for the racetrack. They are shod with metal shoes in front and behind in order that they remain sound during their training routine and that they have additional grip and stability in training and racing conditions. Most trainers will have two or three turnout pens up to the recommended 30' in diameter or a small restricted, well rail fenced area, of similar dimensions, if a shod horse needs turning out. It would be negligent to turn such horses out, other than in restricted areas.

Horses in training for the racetrack are fed on a high protein specialised diet - they DO NOT get their sustenance from turn out.

Our Clients two yards, which adjoin the LAM007 site are training yards and both have turn out pens, separate from the site proposed for housing. There also is an area of land which has been deliberately excluded, and will be kept open and free from any development.

In summary on the facts the land is agricultural, does not do away with or fragment any facilities and does not involve any facilities essential to the racehorse industry.

2) The appearance in the document of a new site LAM015 now HSA20/RSA 23 in Newbury Road;

This is dealt with under our comments on site HAS 20/RSA 20, formerly LAM015.

3) Highway comments;

In all previous considerations of site LAM007 there has not been any highways objection to the development of the site in whole or in part.

Our Clients commissioned Highways Consultants to re-examine the situation. Development Transport Planning Ltd concluded, that, "*in summary, they do not consider there are any substantive highway reasons for Site LAM007 to be excluded from consideration as a site to be allocated for housing in Lambourn*".

4) A contention relating to the delivery of the site.

The site is readily available and can be delivered.

Other matters.

Other matters that have been raised by third parties include the following:-

Amenity

There are several opportunities for access from the LAM007 site onto Rockfel Road or on to Folly Road none of which need impact on adjoining houses.

The local impact on views due to topography is strictly limited as the Council's Landscape Assessment demonstrates.

Any scheme for development can be designed in such a way as to provide a good standard of amenity for proposed properties and to protect the amenities of existing properties.

Foul Sewers

Work has recently been carried out by Thames Water. Increased sewage from this new development can be accommodated.

Drainage

A combination of surface water drainage and SUDs can ensure the site is adequately drained without off site impacts.

Infrastructure

The development will make CIL contributions towards any infrastructure improvements that are required.

Lastly in the West Berkshire Housing Site Allocations Development Plan Document - Inspector's Report March 2017 by David Hogger BA MSc MRTPI MCIHT he stated:-

"88. Another site in the settlement between Folly Road and Stork House Drive (LAM007 in the SHLAA) displays similar characteristics to the allocated site at Lynch Lane. However, the proposed allocation is sound and there is no justification at this time for allocating further development within the AONB because the limit of 2,000 dwellings, as set out in the CS, would be significantly breached. I note, however, that there is a commitment from the Council to reconsider this site as part of the WBLP preparation".

	<p>This has not been done and the site has not been included in the Draft Plan.</p> <p>Conclusion</p> <p>All these matters were raised before Inspector David Hogger in the last Examination and the Council made a commitment to reconsider the site in front of the Inspector. This has not been done</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	Please see other submissions on this specific point <See Rep ID: PS1170>
<p>4. Proposed Changes</p>	<p><u>Recommendations</u></p> <p><i>Development on this site should be subject to the following conditions and the protection and enhancement of the following features:</i></p> <p><i>Low density, linear housing (similar to that north of Folly Lane would be the most appropriate form of development at the higher elevation, and</i></p> <p><i>Higher density, similar to the housing to the east, on the lower ground in the eastern part of site.</i></p> <p><i>Views from the surrounding countryside would need to be carefully considered</i></p> <p><i>New planting would be important in integrating the buildings into the landscape, including the replacement of the conifer hedges.</i></p> <p><i>An area between the two portions of the site for development would need to be left as open field or open space to reduce the overall impact of the development</i></p> <p>We consider that site LAM007 should be allocated for housing and the settlement boundary altered to include this site. It has previously considered to be a suitable site It is the more logical site of the two considered (HAS 19/RSA 22 and HAS 20/RSA 23) and has been assessed as being sustainable. Unlike the other two it can come forward straight away to be developed. The fundamental principle of the NPPF is the presumption in favour of sustainable development.</p> <p>Elsewhere we have submitted that the housing requirement as a minimum, the LPR relies too heavily on windfall sites, the Plan must meet unmet need from elsewhere and further sites are required. Therefore in the alternative we consider there is no clear planning reason why additional sites should not allocated for development especially as Lambourn. This has the services available in the town, which is recognised as a Rural Service Centre in the existing and proposed Development Plan with development potential. This positive preparation would make the Draft LPR sound.</p> <p>Allocation of Site LAM007 would be a positive approach to plan preparation and meeting the objectively assessed needs of the housing market. Allocation of the site would comply with the existing and proposed Development Plan spatial strategy because Lambourn is a Rural Service Centre where additional housing will be provided.</p> <p>The site itself is deliverable and there are no insurmountable items which preclude its development. Its development would subsidise and support the equestrian industry. There are no highways reasons why the site cannot be developed.</p> <p>The site complies with the adopted spatial strategy. It has been found to be a sustainable location for development. The NPPF has at its core a presumption in favour of sustainable development. The inclusion of LAM007 would be consistent with the NPPF and would make the Plan sound and effective.</p> <p>Site LAM007 Land between Folly Road, Rockfel Road and Stork House Drive should be included in/restored to the Plan in Section 8 as a specific RSA/HSA Policy.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	We do not consider the LPR is sound and would like to participate in the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1558
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 15:18:00
Attached Files	PS1558 Turley (Pangbourne College) Centenary Fields Plan.pdf PS1558 Turley (Pangbourne College) Land at Bere Court Rd Plan.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	No

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>These representations have been prepared by Turley on behalf of Pangbourne College and provide comments on the Regulation 19 Consultation currently taking place in relation to the West Berkshire Local Plan Review 2022- 2039.</p> <p>As you will be aware our client has important land interests in the Local Plan area, including the Pangbourne College estate. The majority of the estate lies to the north of Pangbourne village and surrounds the main core of the college, sports facilities and boarding houses. Additional land within the College's ownership includes the Boathouse on the western edge of the village.</p> <p>These representations provide commentary on the consultation document as a whole, as well as specifically in relation to two parcels of land within our clients' ownership. Separate representations are submitted in relation to other parcels of the College's land.</p> <p>LOCAL PLAN CONTEXT</p> <p>The current Development Plan comprises the Core Strategy (adopted 2012) and the Housing Site Allocations DPD adopted in 2017. The Core Strategy covers the plan period up to 2026 and is premised on the housing need set out within the now revoked South East Plan.</p> <p>This consultation relates to the Local Plan Review covering the period up to 2039. We fully support the principle of the Council reviewing the plan as it provides the opportunity for development needs (for new homes, employment and other land uses) to be considered based on an up-to-date evidence base. Furthermore, it provides the opportunity for the Council to take into consideration any unmet needs from neighbouring authorities and the need to fulfil the Duty to Co-operate.</p> <p>There are some significant physical and technical constraints within the District, including AWE Burghfield and Aldermaston and area of flood plain. The AONB is a policy and landscape designation that covers over 60% West Berkshire, however, not all areas of the AONB are of such a high quality as to warrant their immediate dismissal from consideration in terms of allocating housing site.</p> <p>HOUSING REQUIREMENT AND THE SPATIAL STRATEGY</p> <p>Proposed Policy SP1 (Spatial Strategy) states that development will be focused on three spatial areas: Newbury and Thatcham, the Eastern Area and the North Wessex Downs AONB.</p> <p>The spatial strategy for the North Wessex Downs AONB is set out in proposed Policy SP2 (North Wessex Downs AONB) and confirms that there will be appropriate and sustainable growth that conserves and enhances its special landscape qualities. The Housing Background Paper (January 2023) sets out at paragraph 5.7 that allocations within the AONB have been directed to the settlements within the settlement hierarchy</p> <p>It is of note, however, that the LPR does not allocate any housing to Pangbourne and only very limited housing to both Hungerford and Lambourn (the two other larger settlements within the AONB).</p> <p>SETTLEMENT HIERARCHY</p> <p>Pangbourne is identified by Proposed Policy SP3 as being a Rural Service Centre (the same designation as is currently has through ADPP1 of the Adopted Core Strategy). This is the second tier of settlements after the main urban areas of Newbury, Thatcham and the Eastern Urban Area. SP3 identifies Rural Service Centres as larger rural settlements offering development potential appropriate to the character and function of the settlement.</p> <p>Pangbourne has a mainline railway station offering direct high speed services to Oxford, Reading and London and has frequent bus services operating into Reading and to other surrounding towns and villages. Within the village centre there is a supermarket, bank, pharmacy, post office, doctors surgery, library, primary school, public houses, dental practices, places of worship, a protected employment area, convenience stores, restaurants and takeaways, and a village hall, as well as a youth / water sports centre, children's play areas and sports grounds.</p> <p>The LPR evidence base includes the settlement boundary review topic paper. Appendix 1 of the topic paper – the audit criteria for services and facilities states that:</p> <p><i>“A settlement's accessibility to services and facilities is defined by a 1 kilometre radius from the centre of the settlement and for access to railway stations and employment opportunities within 2 kilometres. These distances demonstrate a reasonable commutable walking distance as suggested by the Chartered Institution of Highways and Transportation (Providing for Journeys on Foot 2000)”</i></p> <p>Appendix 2 – the settlement audit identifies the range of services and facilities available in Pangbourne and maps the 1km and 2km distances. It is of note that the whole of the Pangbourne College Estate is within 2km of the centre of the settlement, and a large proportion lies within 1km.</p> <p>Appendix 3 – the audit matrix and settlement scores identifies Pangbourne as the joint third highest scoring settlement within the District (excluding the main urban areas). It scores 40 points out of a</p>

maximum of 48, losing points for matters such as the lack of a mobile library (despite it having a permanent one). It is clearly one of the most sustainable settlements within the district.

Paragraph 4.19 of the LPR states that Pangbourne has limited development opportunities, we disagree with this statement. Pangbourne does have development opportunities with sites such as those identified later on in this letter, which would go a long way towards providing well designed and appropriate development as natural extensions of the existing settlement, within acceptable distances from the centre of the village as defined in the settlement hierarchy topic paper.

Pangbourne does not have a neighbourhood plan, and therefore, sites are unlikely to come forward through one in the early part of the new plan period.

Pangbourne is also designated as a District Centre through proposed Policy SP22 and it is considered important that, in order to support the vitality and viability of district centres, additional housing should be brought forward in combination with economic and commercial growth. This will ensure that businesses can thrive through both additional customers as well as employees being able to live locally and the facilities such as the local schools benefit from additional families in the area. This is of particular importance when the local school has a falling roll as evidenced by the schools allocation data available on the Council's website. It is considered that further housing should be allocated to settlements where district centres are supported, such as Pangbourne.

There is a clear need for housing to be provided at Pangbourne given its status within the sub region, its sustainability in terms of the services and facilities it provides as well as its proximity to Reading and its role within the Greater Reading Area. The existing settlement boundary is tightly drawn around the existing built form of Pangbourne and as such it will need to be revised to accommodate an appropriate level of growth.

The LPR does not propose housing allocations in and around Pangbourne. We consider that this approach is artificially restricting the level of new housing development that can come forward and that not proposing any allocations at one of the most sustainable settlement in the District is unsound.

The NPPF sets out that the tests of soundness include positively prepared, justified, effective and consistent with national policy.

For a plan to be considered positively prepared, it needs to provide a strategy that seeks to meet the area's objectively assessed needs together with any unmet need from other authorities. It is considered that this plan does not allocate housing in accordance with its settlement hierarchy to meet its housing needs.

The plan is not considered to be justified in its approach as it seeks for the remainder of its unallocated housing need to be met through windfall sites and neighbourhood plans instead of allocating developable and available sites. Therefore, we do not consider the strategy to be appropriate.

We do not consider that the plan will be effective in delivering the amount of development needed in the area as it fails to fully address its housing need through site allocations.

For these reasons, we consider that the plan cannot be considered to be sound.

CONCLUSIONS

To summarise, we broadly support the Council's approach to the Local Plan Review but consider that the plan is not currently sound because it has not been positively prepared, is not justified and not effective for the reasons set out above. We consider that our client's land interested can assist in meeting the District's development needs, through the delivery of housing. These representations also confirm the suitability of the two sites for small extensions to the existing settlement.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>LAND AT CENTENARY FIELDS</p> <p>The site at Centenary Fields (location plan included at appendix 1 [see attachment 'PS1558 Centenary Fields Plan']) lies on the periphery of the College's estate, along Bere Court Road and close to the existing settlement boundary. Vehicular access to the site is taken from an existing driveway track serving the residential properties known as St Vincent, Rodney and Derwent. This track is a former access to Pangbourne College itself and has sufficient visibility splays to accommodate additional traffic.</p> <p>The site is screened to all boundaries by existing trees and hedging and sites on a plateau meaning its visibility from the wider countryside and AONB is limited.</p> <p>In sustainability terms, the facilities within Pangbourne all lie within less than 1km of the site, wholly within the most accessible distance outlined in the Council's settlement hierarchy topic paper. Bere Court Road is a quiet rural road and there is a footpath within 200m of the site which provides off road access to Pangbourne Hill, where there is a segregated footway into the village centre and railway station. Alternative routes into the village on foot include Courtlands Hill, which is a quiet private street.</p> <p>In 2010 planning permission was granted on appeal for the residential redevelopment of former College properties 75m to the west of the Centenary Fields site. In allowing the appeal and granting planning permission the Inspector stated that</p> <p><i>"the location's closeness to the settlement boundary would ensure that the option of a journey on foot or by bicycle would also be available ... the site's location is not unsustainable."</i></p>

This is echoed by the Council's own evidence in the settlement hierarchy topic paper which sets out the acceptable distances from services and facilities as 1km to 2km. The whole of this site lies within that area.

Technical considerations

There are no Flood Risk issues in relation to the site, with surface water drainage matters capable of being dealt with through the detailed design stage.

An initial ecological appraisal has been carried out which confirmed that there are no statutory designated sites of ecological value that would be affected by the development and that only the boundaries of the site have the potential to offer suitable habitats from some ecological species. Whilst further surveys will be required and appropriate mitigation strategies may be required to support a planning application, the retention of the mature boundaries will ensure that any species present will be protected and managed appropriately.

The site was assessed by the Council through the Housing and Economic Land Availability Assessment (HELAA) 2020 and was considered unsuitable for allocation because:

Development would result in harm to the natural beauty and special qualities of the AONB.

Development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape.

Due to these constraints, the Council considered that the site would not be developable within the next 15 years.

In light of the Council's up to date evidence the site is considered to be appropriate in the context of the existing settlement form, especially given the residential enclave of properties immediately to the west of the site and the very large extensions and redevelopments of residential properties on the southern side of Bere Court Road.

This site would essentially be the infilling of the gap between an estate of houses and the existing settlement.

The location of the site on a plateau with higher ground to the north and dense screening to the south is such that there would be no adverse landscape impact and no harm to the beauty and special qualities of this part of the AONB.

LAND AT BERE COURT ROAD, PANGBOURNE

This site is located adjacent to the Bewley development known as Croft Drive, which was deemed to be a sustainable location by a Planning Inspector (location plan included at Appendix 2) [see attachment 'PS1558' .

Bere Court Road is characterised by residential plots comprising large residential properties accessed directly from the road via private driveways. This gives a 'ribbon development' effect to this area. This site presents an ideal location to add a small number of further properties to this land reflecting on the existing development pattern. It is considered that the site could be a suitable location for a number of self build development plots given the diverse style and character of the existing properties in the locality; many of which have been extensively remodelled, extended or redeveloped recently.

In sustainability terms, the facilities within Pangbourne all lie within less than 2km of the site, wholly within the most accessible distance outlined in the Council's settlement hierarchy topic paper. Bere Court Road is a quiet rural road that leads out onto Pangbourne Hill, where there is a segregated footway into the village centre and railway station. Alternative routes into the village on foot include Courtlands Hill, which is a quiet private street.

In 2010 planning permission was granted on appeal for the residential redevelopment of former College properties immediately adjacent to this site. In allowing the appeal and granting planning permission the Inspector stated that

"the location's closeness to the settlement boundary would ensure that the option of a journey on foot or by bicycle would also be available ... the site's location is not unsustainable."

This is echoed by the Council's own evidence in the settlement hierarchy topic paper which sets out the acceptable distances from services and facilities as 1km to 2km. The whole of this site lies within that area.

Technical considerations

There are no Flood Risk issues in relation to the site, with surface water drainage matters capable of being dealt with through the detailed design stage.

In light of the Council's up to date evidence the site is considered to be appropriate in the context of the existing settlement form, especially given the existing residential properties along Bere Court Road and the new properties immediately to the north of the site.

The location of the site amongst existing trees and vegetation means it would be well visually screened and such that there would be no adverse landscape impact and no harm to the beauty and special qualities of this part of the AONB.

<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>In order to ensure that the Inspector understands the merits of the sites available for development at Centenary Fields and Bere Court Road</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1567
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:18:00
Attached Files	PS1567 Turley (Pangbourne College) Bowden Fields Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The plan fails to consider whether Pangbourne, as a rural service centre, can accommodate development outside of the existing settlement, in particular, to contribute to meeting the needs of specialised housing as set out in Policy DM19.</p> <p>OMISSION SITE</p> <p>Pangbourne College has a suitable, available and deliverable site (Bowden Fields) which could provide elderly living accommodation to meet the ever growing need (and unmet demand) and assist with meeting the Council's housing requirement [see attachment 'PS1567 Turley (Pangbourne College) Bowden Fields Plan'].</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The plan should be amended to identify sites in and round Pangbourne, which is identified within the settlement hierarchy (SP3) and the second highest tier settlement with extensive services and facilities available.</p> <p>Allocating sites for specialist housing, in this instance older persons accommodation / retirement living, plays a key part in allowing family housing within villages to be made available on the open market, bringing new economically active adults into the area and assisting in sustaining local services and facilities. It also provides job opportunities for the local community and allows older people to stay in their communities with additional support.</p> <p>Bowden Fields sits outside of, but less than 2km of, Pangbourne village centre. It has existing development in form of sports facilities and pitches with suitable vehicular access. The site is screened by existing trees and hedging to the south and by residential properties to all other boundaries. Bowden Fields can be developed without adverse impact on the wider landscape due to the existing screening. Access to the site can be provided from Yattendon Road to the south, with the access to be upgraded as required.</p> <p>There are no Flood Risk issues in relation to the site, with surface water drainage matters capable of being dealt with through the detailed design stage.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1824
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 19:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>In other representations we found much of Policy SP 1 is unobjectionable and can be supported but objection was raised to the very last sentence which has now been deleted:-</p> <p>“Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through Neighbourhood Development Plans”.</p> <p>However this matter had now been fudged and the LPR does not provide the required certainty. This problem is exacerbated in Paragraph 6.25 which proposes that 80 dwellings will be provided through Neighbourhood Plans and paragraph 6.41 states <i>“Additional sites will be delivered through the Neighbourhood Plans for Lambourn and Hungerford. The Neighbourhood Plans for Compton and Hermitage do not include residential allocations, and instead comprise of development management policies”</i>. No explanation is given as to why this figure of 80 has reduced from the 315 in the Reg 19 Plan. This matter is also referred to in Paragraph 6.25 of the LPR</p> <p>That is an abrogation of the function of this LPR. Neighbourhood Plans should not be making housing allocations, that is a function of the LPR, and indeed some such sites coming forward may cut across the LPR.</p> <p>Furthermore Policy SP15 (page 65) suggest that the Lambourn Neighbourhood Plan should provide 25 dwellings in addition to the sites already included in the Draft Plan (and which we suggest may not come forward).</p> <p>Indeed if the task of allocating housing sites is left to Neighbourhood Plans, especially in Lambourn, either that Plan may not come forward or, more likely, local residents will not want additional housing in their locality leaving the housing needs/requirement unsatisfied.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	Please see other submissions on this specific point <See Rep ID: PS1170>
4. Proposed Changes	<p>The reliance on allocations through the Neighbourhood Plan process raises questions as to whether the objectively assessed needs will be met within the plan period increasing pressures on other settlements to meet the unmet need.</p> <p>The Council should allocate all housing sites through this Draft LPR and do not leave the task to Neighbourhood Plans. Amend or delete Paragraphs 6.25 and 6.41 and Policy SP15 “Total designated by Neighbourhood Area” to delete the 80 dwellings therein and replace them with allocated sites one of which could be our Clients site “Land between Folly Road, Rockfel Road and Stork House Drive (SHLAA site reference LAM007)”.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We do not consider the LPR is sound and would like to participate in the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn Business Park (Represented by Savills)
Consultee Full Name	Lambourn Business Park
Consultee Organisation	Lambourn Business Park
Agent Full Name	Ms Catherine Mason
Agent Organisation	Savills (UK) Ltd
Comment ID	PS1039
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:38:00
Attached Files	PS1034/PS1039 Savills obo Lambourn Business Park_cover letter REDACTED.pdf PS1034/PS1039 Savills obo Lambourn Business Park_location plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>[See attached documents Lambourn Business Park cover letter and Lambourn Business Park location plan]</p> <p>West Berkshire Local Plan Review 2022-2039 – Proposed Submission Version (Regulation 19) Representations on Behalf of Lambourn Business Park</p> <p>On behalf of Lambourn Business Park, we write to submit representations to the West Berkshire Local Plan Review 2022-2039 Proposed Submission Version.</p> <p>We support the general thrust of the plan and approach to development, however, it is our view that our client's site (land adjacent to Lambourn Business Park) represents a suitable and deliverable site for housing and should therefore be included within the non-strategic site allocations identified under Policy SP15 and Chapter 8 for the North Wessex Downs AONB Area. This amendment will result in a plan that is positively prepared, justified and effective and will ensure that the housing targets for the North Wessex AONB Area are achieved.</p> <p>This site (1.9 hectares) could deliver a high quality development which makes efficient use of the land and should be included for the reasons set out below. The site has also been submitted as a potential housing site in response to separate consultation in respect of the Lambourn Neighbourhood Development Plan.</p> <p>In order to be found sound at Examination in Public, the policies in the draft Local Plan need to comply with the tests of soundness set out in paragraph 35 of the NPPF (July 2021). The plan must be:</p> <p>a) Positively prepared – <u>providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs</u>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, <u>taking into account the reasonable alternatives</u>, and based on proportionate evidence;</p> <p>c) Effective – <u>deliverable over the plan period</u>, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – <u>enabling the delivery of sustainable development</u> in accordance with the policies in this Framework." (author's emphasis underlined).</p> <p>Policy SP3 of the emerging Local Plan identifies Lambourn as a Rural Service Centre offering development potential appropriate to the character and function of the settlement.</p> <p>Policy SP1 of the emerging Local Plan identifies the spatial strategy for West Berkshire to:</p> <ul style="list-style-type: none"> • Direct development to areas of lower environmental value; • Optimise the use of previously developed land; and • Optimise the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment. <p>Policy SP2 of the emerging Local Plan (North Wessex Downs AONB) states that the North Wessex Downs Area AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.</p> <p>The proposed site offers the potential to deliver housing in accordance with emerging policies SP1 – SP3 for the following reasons:</p> <ul style="list-style-type: none"> • The site is 'wrapped around' by other parts of the business park (see below). There is built development on three sides and a number of established buildings on the fourth. Therefore the development would

be 'infill' development that could be incorporated into the existing surrounding built form without any westward incursion into the countryside beyond the existing built form of the business park.

[See image within attached Cover Letter]

- Today, Lambourn Business Park (to the east and south of the site) is established as a location for office / industrial and storage use and designated as a Protected Employment Area in the Council's Local Plan. The proposed site benefits from an extant planning permission (11/01822/OUTMAJ) for commercial development but remains vacant (see approved layout below). The approved buildings are single storey and do not make efficient use of the site. The site has been marketed but commercial development is not viable at the current time. However, the planning permission remains 'extant' which means it could be built in the future if market forces change.

[See diagram within attached Cover Letter]

- Up until now the site has been underutilised, considering its historic use and long-established planning consent for redevelopment. Aside from the site's position within a designated AONB there are no other known constraints to development. The site is positioned within an established business park with an extant planning consent for commercial development and is not considered to make a positive contribution to the AONB.
- Through a landscape-led approach to layout, scale, density and design the development offers the opportunity to make a positive impact on the landscape.
- Buffer planting will serve to soften and screen the development from the adjacent business park and surrounding landscape alongside additional opportunities to 'green' the site through play and drainage features.
- The proposals seek to deliver up to 25 new homes (see sketch below). The development would offer a range of housing types and tenures, informed by local housing needs. It would include affordable housing.

[See image within attached Cover Letter]

- Mixed use development would add vitality to the business park, particularly at evenings and weekends. Night-time activity would naturally add security and safety to the business park. None of the existing activities at the business park would preclude adjacent residential development.
- Access would be provided via the existing and retained business park to the east, along the Public Right of Way which dissects the site.
- The site could come forward independently or as part of a wider site incorporating land to the west (which already has some limited buildings) within the plan period, subject to the needs of existing businesses currently located on the site. As part of the wider site, this could deliver a meaningful contribution to the housing targets for this spatial area with limited impact on the AONB.
- The site (including the wider site) is within a single ownership and is available immediately for development.

Allocation of this site within Policy SP15 of the Local Plan will accord with emerging policy SP1 of the Local Plan on the basis that the site benefits from an extant planning permission and is therefore tantamount to previously developed land, it represents an opportunity to make a positive impact on the landscape and AONB and would make efficient use of the land (unlike the extant planning permission).

In order to ensure that the Local Plan is effective and justified, and ultimately sound, this site should be included within Policy SP15 the Local Plan as a non-strategic site allocation in the North Wessex AONB.

If the Council and / or appointed Inspector wanted to consider a larger housing allocation then our client would be open to considering residential development on the wider site in their ownership (see attached location plan showing the proposed site in red and wider land ownership in blue).

We request to be kept informed as the plan progresses and would like to participate in the Examination Hearing sessions to ensure our client's case is fully understood.

Please do let us know if you have any queries or would like to discuss.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Inclusion of the site as non-strategic allocation within Policy SP15 in order to ensure the plan is positively prepared, effective and justified. See attached representation for full details.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1609
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	PS1609 Craig Pettit Fig. 1 Image.jpg PS1609 Craig Pettit attachment vision document.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Policy SP15 (Sites allocated for residential development in North Wessex Downs AONB) – Thakeham is supportive of this policy, encouraging neighbourhood plans being prepared in Lambourn and Hungerford to allocate housing. However, we would re-emphasise the point about making sure that each allocation is deliverable.</p> <p>Policy RSA14 (Land Adjoining Lynch Lane, Lambourn. Site ref. HSA19) – Thakeham notes that this site was allocated in the 2017 Site Allocations Plan where the policy states “<i>This site is expected to deliver early and to contribute immediately to the supply of land needed to demonstrate a five year housing land supply</i>”. Despite this, the site has not commenced, and successive Annual Monitoring Reports fail to give any justification. As stated elsewhere in these representations, the Council should not just allow these allocations to roll forward unless there is a reasonable prospect of them being delivered, or at least supporting them with additional allocations should they continue to prove undeliverable, with sites that are demonstrably available, suitable and deliverable, such as the Site at Wantage Road, Lambourn.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council’s evidence underpinning certain policies is strong, in others it is notably weak.</p> <p>Thakeham has interests across West Berkshire, including land at west of Wantage Road, Lambourn.</p> <p>Land at West of Wantage Road, Lambourn (“the Site”)</p> <p>Please find enclosed a Vision Document for the Site at Lambourn, which should be read alongside our commentary herein. In summary, it is considered that a sensitive development of the Site could accommodate the following:</p> <ul style="list-style-type: none"> • Delivery of 10% Biodiversity Net Gain; • Delivery of zero carbon homes in lifetime operation; • Circa 27 new homes comprising a variety of accommodation to attract different households; • Policy compliant provision of affordable housing, in tenure blind design; • Scope for delivery of housing to meet the needs locally of those in the racing industry; • New local facilities (allotments indicatively proposed); • The provision of an open community recreation space; • A focus on sustainable transport through the provision of a new access in addition to pedestrian links into the existing neighbouring <p>Alongside undertaking this review of the Reg 19 Local Plan, Thakeham has engaged with the ongoing preparation of the Lambourn Neighbourhood Development Plan (LNDP). In July 2022, the LNDP Steering Group issued a Call for Sites, having identified a need for further homes within Lambourn. Thakeham submitted the Site to be assessed and considered for allocation within the emerging LNDP on 31 August 2022.</p> <p>In January 2023, the LNDP Steering Group undertook a public consultation on the nine proposed housing sites that had come forward via the Call for Sites process, asking for feedback from the local community. Of those who responded, and who expressed a first- choice preference, 55% stated that the Site at Land West of Wantage Road was their preferred option, with the second-most preferred Site achieving just 16% of the responses. Thakeham therefore considers that the Site is generally well supported among</p>

	<p>the local community and represents the most sustainable and acceptable location for housing development in the Village.</p> <p>Attachment Fig1: Lambourn Neighbourhood Development Plan, Preferred Sites consultation 2023. Source: https://lambourn.pc.gov.uk/Indp_public_consultation_on_development_sites_the_results/ Attachment: Vision Document - Land at Wantage Road Lambourn</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1859
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>3. Regulation 19 Proposed Submission document representations</p> <p>Proposed residential site allocations</p> <p>3.17 Having taken into account existing commitments and windfalls, the draft Plan proposes the delivery of 4,252 dwellings through specific housing allocations. The following allocations are retained allocations from the adopted Core Strategy and Site Allocation documents.</p> <p>3.20 The following sites are proposed within the North Wessex Downs AONB:</p> <p>Retained allocations</p> <ul style="list-style-type: none"> • Land adjoining Lynch Lane, Lambourn (RSA14) – 60 dwellings • Pirbright Institute site, High Street, Compton (RSA18) – 140 dwellings • Land off Charlotte Close, Hermitage (RSA20) – 15 dwellings • Land at Newbury Road, Lambourn (RSA15) – 5 dwellings • Land north of South End Road, Bradfield Southend (RSA16) – 20 dwellings • Land west of Spring Meadows, Great Shefford (RSA19) – 15 dwellings • Land to the south east of the Old Farmhouse, Hermitage (RSA21) – 10 dwellings

New allocations (totally 69 dwellings):

- *Land at Chieveley Glebe (RSA17) - 15 dwellings*
- *Land adjacent Station Road, Hermitage (RSA22) – 34 dwellings*
- *Land adjacent to The Haven, Kintbury (RSA23) – 20 dwellings*

3.21 Some of the above allocations are retained from the previous adopted plan period of 2006 – 2026 due to the overlap of the plan period for the emerging plan (2022 – 2039). These amount to 2,652 dwellings that were outstanding from the previous plan period at 31st March 2022.

3.22 New sites proposed for allocation in the new plan period total 1,720 dwellings, which with 1,500 proposed at North East Thatcham.

3.23 The proposed allocated sites are listed in the table below, along with a review of their current planning status. We would question why some are retained as allocations, rather than commitments, given their planning status.

Retained allocation from Core Strategy: Land adjoining Lynch Lane, Lambourn 60 dwellings

Planning status: No planning application submitted at the current time. Delivery timings unknown.

Retained allocation from Core Strategy: Pirbright Institute site, High Street, Compton 140 dwellings

Planning status: Outline application 20/01336/OUTMAJ for up to 160 homes approved February 2022, subject to S106 agreement. Resolution to approve at planning committee in February 2023, in accordance with previous resolution in 2022.

Retained allocation from Core Strategy: Land off Charlotte Close, Hermitage 15 dwellings

Planning status: Full application 20/00912/FULEXT for 16 dwellings approved in October 2021. Various discharge of conditions have been approved throughout 2022.

The developer anticipates delivery of residential units in 2023/24.

Retained allocation from Core Strategy: Land at Newbury Road, Lambourn 5 dwellings

Planning status: Full application 20/00972/FULMAJ for 8 dwellings approved September 2021. This site is also subject of a pending planning application for 5 dwellings (22/00277/FULMAJ) submitted in Feb 2022. This is pending determination.

Retained allocation from Core Strategy: Land to the south east of the Old Farmhouse 10 dwellings

Planning status: Outline application for 21 dwellings approved November 2018. Reserved matters application 21/02923/RESMAJ submitted in November 2021 and pending determination.

4. Sustainability Appraisal scoring for Land at Long Lane, Newbury

Conclusions on site selection and SA

4.20 We consider that the LPR Sustainability Appraisal (“SA”) has therefore not considered reasonable alternative options, which is inarguable given the omission of any consideration of sites not included within the Plan. The SA is therefore in breach of the SEA Directive and the SEA Regulations and these breaches are fatal to the legality of the LP.

4.21 Additionally, it calls into question the entire site selection process if a site has been assessed and rejected for technical reasons when no legitimate and substantiated technical reasons exist to justify

	<p>such an outcome. This, we submit, suggests that the entire site selection process is fundamentally flawed, particularly given the conflict with the identified spatial strategy.</p> <p>4.22 The draft Plan proposes sites in the AONB, and the eastern area which does not accord with the Council's spatial strategy.</p> <p>4.23 There are only two strategic site allocations (SP16 Sandford Park and SP17 North East Thatcham), the remainder are relatively small sites (between 15-160 dwellings). The Sandford Park allocation has outline planning permission allowed at appeal for two-thirds of the allocation. The remainder of the site is under Donnington New Homes' ownership and there is a live planning application pending determination (reference 18/00828/OUTMAJ).</p> <p>4.24 It is considered the plan does not propose medium sized sites that can come forward in the interim period to ensure housing delivery. The site at Long Lane for approximately 260 dwellings can provide a medium sized site that is available and deliverable under land controlled by Donnington New Homes. The SA conclusions state that the negative and uncertain effects may be able to be mitigated further. It is considered the uncertain and negative effects identified in the SA can be overcome through a well-designed scheme and submission of information, resulting in positive impacts.</p> <p>4.25 The planning merits of the Site considered in section 2 of these representations demonstrate that there are no in-principle technical barriers to prevent residential development of the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Rivar Ltd (Represented by Pro Vision)
<p>Consultee Full Name</p>	Rivar Ltd
<p>Consultee Organisation</p>	Rivar Ltd
<p>Agent Full Name</p>	Gareth Johns
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1535

Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Policy SP15 of the Plan identifies part of the 'Land north of Southend Road, Bradfield Southend' as a site allocation for approximately 20 dwellings. A site-specific Policy is included at Policy RSA16. Rivar, in principle, support the allocation of the 'Land north of Southend Road, Bradfield Southend' for residential development in Policies SP15 and RSA16. <i>[For comments relating to policy RSA16, see PS1534]</i>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1807
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>To ensure consistency within the document, it is recommended that additional wording is included within Policy SP15 to confirm that the identified capacity for each allocated site represents an approximate capacity and not a cap, as set out in Policy SP12:</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Development in the North Wessex Downs <u>AONB</u> is will be allocated for the approximate number of <u>homes</u> as follows: [...]</p> <p>Furthermore, Darcliffe recommends the inclusion of an allocation for residential development at Land west of Little Heath Road, Reading, under a new policy 'RSA24'.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	<p>Yes</p>

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne Beaver Properties Ltd (Represented by Nexus Planning)
Consultee Full Name	Pangbourne Beaver Properties Ltd
Consultee Organisation	Pangbourne Beaver Properties Ltd
Agent Full Name	Adam Ross
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1752
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	Nexus obo Pangbourne Beaver Properties_SP15 Attachment part1.pdf Nexus obo Pangbourne Beaver Properties_SP15 part 2.pdf Nexus obo Pangbourne Beaver Properties_SP15 part 3.pdf Nexus obo Pangbourne Beaver Properties_SP15 part 4.pdf Nexus obo Pangbourne Beaver Properties_SP15 part5.pdf Nexus obo Pangbourne Beaver Properties_SP15 part6.pdf Nexus obo Pangbourne Beaver Properties_SP15 part 7.pdf (1) Nexus obo Pangbourne Beaver Properties_SP15 part 8.pdf Nexus obo Pangbourne Beaver Properties_SP15 part 9.pdf Nexus obo Pangbourne Beaver Properties_SP15 part 10.pdf Nexus obo Pangbourne Beaver Properties_SP15 part 11.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><Full Representation and appendices attached></p> <p>These representations have been prepared by Nexus Planning on behalf of Pangbourne Beaver Properties Ltd, in response to the West Berkshire Local Plan Review 2022-2039 – Regulation 19 consultation (“the Plan”).</p> <p>We object to Policy SP15 as the site allocations made therein are internally inconsistent with the identified spatial strategy and settlement hierarchy as set out elsewhere in the Plan.</p> <p>Given the Council's acceptance that some residential development is justified / necessary in the North Wessex Downs AONB area (a conclusion with which we agree), we object to the subsequent failure of the Plan to allocate <u>any</u> development at Pangbourne (a Rural Service Centre as identified in Policy SP3) whilst allocating development in materially less sustainable locations, and on sites that are far less logical / justifiable than Site Ref: PAN8 at Pangbourne (Land to the north of Sheffield Place) as identified in the HELAA 2020 (updated in 2023). Site Ref: PAN8 adjoins the existing settlement of Pangbourne to the east and to the south, is within easy walking distance of Pangbourne railway station and the village centre, and sits well within the landscape.</p> <p>We can only assume that the failure to allocate Site PAN8, the only material site available at Pangbourne, is based on the conclusions of the Council's HELAA 2020 / 2023. However, we submitted representations to that document in 2020 identifying fundamental flaws and inaccuracies in relation to its conclusions relevant to Site PAN8 - flaws / inaccuracies that have not been either acknowledged or subsequently corrected. As a consequence, this site has not been allocated for development and as a result, Pangbourne has not been allocated <u>any</u> growth despite the Council's acceptance of the need for development in the North Wessex Downs AONB, and the inherent sustainability of Pangbourne as a settlement.</p> <p>We support the Vision and Strategic Objectives that are set out in Section 3 of the Plan, and the three key policies upon which the 'Place-Based Approach' is structured. However, the allocations made in the Plan do not accord with the identified Vision / Objectives / Policies and accordingly we have additionally submitted objections to the following policies:</p> <p>SP1 - The Spatial Strategy SP2 - North Wessex Downs AONB SP3 - Settlement Hierarchy.</p> <p>Policy SP1 identifies a strategy (with which we agree in principle) that includes the provision of appropriate and sustainable growth within the North Wessex Downs AONB spatial area. This objective is repeated in Policy SP2.</p> <p>Policy SP2 is also clear (and we again agree) that development within each spatial area will follow the districtwide settlement hierarchy, which takes account of the function and sustainability of settlements.</p> <p>Policy SP3 identifies this settlement hierarchy (see Appendix 1) identifying Pangbourne as one of six 'Rural Service Centres' i.e. settlements acknowledged by the Council to benefit from a good range of key services and opportunities for employment, community and education, serving a wide catchment area and containing reasonable accessibility and regular public transport provided to a number of destinations (and behind only the Urban Areas of Newbury, Thatcham and the Eastern Urban Area in terms of sustainability). At Appendix 2 to this representation we have re-provided the 'Audit Matrix and</p>

Settlement Scores' for each village as produced by the Council. At **Appendix 3** we have provided, for ease of reference, an extract of Policy SP15 itself.

Pangbourne, notably, and unlike the other Rural Service Centres such as Burghfield Common and Lambourn, has a mainline railway station providing access to Oxford, Reading and London. This is a significant sustainability benefit and makes it even more important as a location for some residential development.

The locational and policy advantages of Pangbourne are identified on the 'Constraints Plan for Pangbourne' taken from the West Berkshire Interactive Map and re-provided at **Appendix 4**.

Policy SP15 proposes to make allocations of between 15 and 140 homes on sites in the North Wessex Downs AONB area at Hermitage, Compton, Lambourn, Chieveley and Kintbury, and to make further smaller allocations of between 5 and 20 units at Lambourn, Bradfield Southend, Great Shefford and Hermitage. However, it makes no allocations at all at Pangbourne despite it having the fourth highest settlement score according to the Council's own Audit Matrix and Settlement Scores i.e. the Plan makes residential allocations at locations that the Council itself accepts are less sustainable than Pangbourne. This approach is wholly unjustified, inappropriate, internally inconsistent and unsound, resulting in a Plan that does not meet or consider the needs of Pangbourne, and with an unsustainable pattern of development that fails to recognise the inherent sustainability of the settlement of Pangbourne.

The plan below, which uses the West Berkshire Core Strategy Key Diagram as its base but which we have annotated, show the levels of housing proposed in the Plan at the various settlements within the North Wessex Downs AONB area. As can be quickly appreciated from this plan, a relatively significant quantum of housing is proposed at a range of lower level settlements whilst Pangbourne, despite being one of the most sustainable locations in this part of the district (and the district as a whole), is allocated with no housing despite the availability of appropriate sites, most specifically Site PAN8 as referenced further in these representations.

<See map on page 4 of attached document 'Nexus obo Pangbourne Beaver Properties_SP15 Attachment 1'>

Why Pangbourne Needs Housing

Beyond existing commitments, the failure to allocate any additional housing at Pangbourne in the Plan means that no additional provision is made to meet local housing needs over the 17-years covered (2022 to 2039). Over this period, the reliance only on existing commitments (53 dwellings) equates to housing growth at Pangbourne of only 3 dwellings per annum (dpa).

Delivery of 53 dwellings would accommodate population growth over the Plan period of around 127 persons (based on an assumed 2.4 persons per household) - broadly a population change of 7 persons per annum. However, Census 2011 and Office for National Statistics (ONS) Mid Year Estimates (MYEs) indicate that Pangbourne's population has increased by an average of 35 persons per annum between 2011 and 2019 (a total change of 277 total persons) – a rate of change very meaningfully greater than that provided for in the Plan. Analysis of the Census 2011 and the MYEs also indicates that the resident population of Pangbourne Parish has consistently been around 2% of West Berkshire's total resident population.

The Council's monitoring data confirms that over the five monitoring years (2015/16 to 2018/19), an average of 11 dpa have been delivered at Pangbourne. Over a longer 10-year monitoring period (2009/10 to 2018/19), an average of 8 dpa have been delivered.

Overall, trend analysis would suggest that housing growth of at least 8 - 11 dpa would be required at Pangbourne to support the continuation of trend-based population change over the Plan period. This equates to delivery of between 136 and 187 dwellings over the Plan period, with the mid-point being 10 dpa (or 162 dwellings over the Plan period).

Notably, 2% of the Policy SP12 minimum housing target for the District (513-538 dpa) equates to 10-11 dpa (or 170-187 dwellings over the Plan period) - a level of growth broadly similar to housing growth trends at Pangbourne but a figure which also includes an appropriate affordability and 'significantly boosting' housing growth uplift. Indeed, Land Registry housing affordability indicators show that median house prices at Pangbourne (£579k for the year ending December 2019) are meaningfully higher than West Berkshire as a whole (£392k for the year ending December 2019).

Provision of only around 3 dpa at Pangbourne, relying on existing commitments only, is therefore wholly inappropriate and unsound and will not, contrary to Policy SP1, provide for appropriate and sustainable growth that has regard to the district-wide settlement hierarchy. The approach is also inconsistent with national policy which states (National Planning Policy Framework paragraph 78) that housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

It is acknowledged within the AONB that the scale and extent of development should be limited (Framework paragraph

176) but as outlined above, delivery of only 3 dpa within one of the district's most sustainable Rural Service Centres is a level of growth which is significantly below that required to meet local market and affordable housing needs, and maintain the settlement's vitality over the Plan period, and beyond.

Delivery of at least 10 - 11 dpa (170-187 dwellings over the Plan period) should, therefore, be proactively planned for at Pangbourne. In addition to the 53 homes that already form commitments at Pangbourne, land to accommodate between 109 and 151 additional dwellings should be allocated within the Local Plan. As outlined later in these representations, Site Ref PAN8 can contribute towards meeting these local housing needs.

Sites Allocated for Development in the North Wessex Downs AONB

As referenced previously, the Council's approach to the allocation of sites within the North Wessex Downs AONB area is unsound given the wholly unjustified absence of any provision at the highly

sustainable settlement of Pangbourne. To demonstrate this further, and the conflict it creates with the Plan's own Vision and spatial strategy, we have undertaken an assessment of those sites that are proposed to be allocated in Policy SP 15. This assessment provides the following for each of these sites:

- a. Site allocation plan – West Berkshire Council.
- b. Site allocation policy – West Berkshire Council
- c. Aerial photograph to show the site in context
- d. Settlement Hierarchy and HELAA designation
- e. Environmental designations
- f. Our high level commentary on planning history and qualities of the site

Of the six 'Large sites' (1ha or larger) that have been allocated two sites:

- RSA 18 Compton; and
- RSA 20 Charlotte Close, Hermitage

have planning permission and we cannot therefore question them.

Of the four 'Small and Medium sites' (less than 1 ha) that have been allocated two sites:

- RSA 15 Newbury Road Lambourne; and
- RSA 21 Land to the south east of the Old Farmhouse at Hermitage

also have planning permission and we cannot now question these.

As such, our assessment focusses on the six remaining proposed allocations. This allows a relative assessment to be carried out with Site Ref: PAN8 at Pangbourne. From this, it can clearly be seen that the allocated sites are in materially less sustainable locations, are less well-located having regard to their relationship with existing settlements, and have similar / greater landscape and / or ecological impacts. Accordingly, the allocation of these sites, in the absence of an appropriate allocation at the materially more sustainable Pangbourne, does not comply with the strategic objectives of the Plan and in particular Policies SP1, SP2 and SP3. Appendix 5 of this representation is the analysis of these sites according to the criteria set out in paragraph 3.1 above. In summary, however, we note the following in relation to these 6 sites:

RSA 14 Lynch Lane, Lambourn – (Current Policy Ref HSA 19) - Lambourn is a settlement that is materially less sustainable than Pangbourne. It is a site originally allocated in the Housing Site Allocations DPD (201) ("HSADPD") but it is constrained by a number of environmental factors including flood risk associated with the River Lambourn to the north and a SSSI. In addition, on the basis that this site was originally allocated in the HSADPD but has still not been developed, its deliverability must be questioned.

RSA 17 Land at Chieveley Glebe – This site comprises ribbon development at a village with a low sustainability score (26) in the Council's own Audit Matrix and Settlement Scores.

RSA 22 Land adjacent Station Road, Hermitage – A large extension (34 homes) to a village with a low sustainability score in the Council's Audit Matrix and Settlement Scores (24).

RSA 23 Land adjacent to The Haven, Kintbury – A relatively incongruous extension to a well-established settlement boundary, at a settlement that scored only 29 in the Council's Audit Matrix and Settlement Scores paper.

RSA 16 Land north of South End Road, Bradfield Southend – A large extension (20 homes) to a village with a low Settlement Score (21) as identified in the Council's Audit Matrix and Settlement Scores document. The northern boundary of the site is undefined by physical features and it has a poor site access.

RSA 19 Land west of Spring Meadows, Great Shefford – An exposed and relatively incongruous extension to a small village with a low Settlement Score (22) as set out in the Council's Audit Matrix and Settlement Scores document.

We consider that the allocation of these sites, in the absence of the allocation of any new development at the materially more sustainable settlement of Pangbourne (that scores 40 in the Council's Audit Matrix and Settlement Scores document), and specifically Site PAN8, means that Policy SP15 conflicts with the Council's Vision and spatial strategy, and the objectives of Policies SP1, SP2 and SP3, and is unsound. For comparison, Section 4 of these representations assesses the PAN8 site at Pangbourne against the same criteria applied to the above sites.

The Merits of land to the North of Sheffield Close in Pangbourne (PAN8)

For all of the reasons identified previously, and elsewhere in our representations, it is evident that provision must be made for additional housing at Pangbourne. In this regard, the only realistic site that is available for any meaningful quantum of residential development is site reference PAN8, which is accessed from Sheffield Place.

This site is gently undulating land that is well-screened by existing trees and hedges. It is a short walk from the centre of Pangbourne, via a pedestrian ramp that abuts Pangbourne Hill in the south east corner of Sheffield Place. It will form a natural extension to the village. It is also in close proximity to Pangbourne railway station, that provides access to services to Reading and Oxford.

The 'West Berkshire Landscape Sensitivity Assessment 2011 – Site Reports PAN 002' considered the merits, in landscape terms, of the large open field (as it was then) that ran from Pangbourne Hill in the south to the railway line in the north. This concluded that development was possible in this location, recommending more specifically that:

"Recommendations

- *Development on this site should be subject to the following constraints to ensure the protection and enhancement of the AONB:*
- *The mass and scale of development should not be visually intrusive and must not detract from views of the Thames valley and the Chilterns*

- *The western boundary should be planted with a linear woodland designed to respect the local topography and vegetation pattern and contain the settlement*
- *The continuous bank and tree cover along Pangbourne Hill/Road should not be broken to provide access to the site*
- *The development should be in keeping with the mass, scale and density of the western part of Pangbourne and include a high level of landscape infrastructure as found in the adjacent Breedon Estate*
- *The layout should work with the grain of the topography and be restricted to lower slopes below the 75m AOD contour, or 70m AOD where the site is more visually exposed.”*

Since that Recommendation was made, the residential development (now known as Sheffield Place) has been completed together with significant woodland planting along the western boundary and across the ridge at the top of the valley at the northern end of the Site, that runs from west to east. This development and planting has transformed the Site and it is now well-enclosed.

The site is located to the west of Riverview Road, and so is substantially above the flood plain. The Landscape Sensitivity Assessment that was undertaken by West Berkshire Council in 2011 indicated that development should be restricted to land below the 75m AOD contour. The development of Sheffield Place has adhered to this guide, as could proposed development of the PAN8 site. The overall site has an area of approx. 5.6 ha, including the existing woodland planting areas. Proposed development would occupy only 50% of the site and could accommodate either:

- Approximately 39 dwellings comprising a mix of two storey houses and flats; or
- A 75-bed senior living Care Home together with approximately 28 dwellings.

Both would include a policy-compliant level of affordable housing.

These alternative concepts are shown graphically on the masterplans below:

<See plan on page 9 of attached document 'Nexus obo Pangbourne Beaver Properties_SP15 Attachment 1'>

Appendix 6 is an analysis of the site according to the criteria set out in paragraph 3.1 of these representations.

The Council's HELAA concludes that Site PAN8 was unsuitable for housing for the following three reasons (the last two of which both relate to landscape matters):

“Development would impact upon local highway network.

Development on the whole site would be inappropriate in context of the existing settlement form, pattern, and character of the landscape.

Concerns that development will result in harm to the natural beauty and special qualities of the AONB.”

We do not accept that any of these reasons can be substantiated, as we have set out previously to the Council.

To demonstrate this further, we have produced reports that address each of issues (which are appended) and summarised in the following sections of this representation.

Landscape Impact/Impact on the AONB

A Preliminary Landscape and Visual Appraisal (PLVA) has been undertaken by EDP (see Appendix 7) which notes, inter alia, that the findings of the Council's HELAA contain a number of inaccuracies in relation to landscape matters, which are summarised as follows:

1. Site Location – the HELAA states that the site only abuts Pangbourne Settlement Boundary to the east, whereas Figure EDP 3.1 shows the southern boundary also abutting the settlement boundary;
2. Landscape Capacity – the HELAA has assumed a capacity of 72 dwellings, whereas representations previously submitted state a maximum of 40 dwellings;
3. Landscape Character – the HELAA states that a key issue for the site is potential significant harm to the special qualities of the AONB. However, the baseline study identified that development of the site would not be likely to affect the special qualities and that any relevant key issues can be mitigated through good design;
4. Landscape Character – the HELAA identified the site within the incorrect Landscape Type and Character Area within the West Berkshire Landscape Character Assessment (August 2019). Conclusions are, therefore, made on the basis of incorrect baseline information and cannot be relied upon;
5. Visual Amenity – conclusions relevant to the visual amenity of the site appear to have been made on the findings of the Landscape Sensitivity Assessment carried out in 2011 i.e. before the significant woodland planting within the site was implemented and omitting nine years of growth of the surrounding vegetation. It is clear that no site visit has taken place since this date - a key omission in relation to the identified 'suitability conclusions'.

As a result, the PLVA considers that the basis on which the 'unsuitable' conclusion was made for Site Ref PAN8 is flawed and cannot be relied upon.

Furthermore, the PLVA concludes, inter alia, that:

1. due to the influence of a number of urbanising features within and adjacent to the site, it is considered to have a close relationship to the western urban edge of Pangbourne, rather than the rural landscape associated with the open downlands to the west;
2. whilst the site is located within the North Wessex Downs AONB and in close proximity to the Chilterns AONB, the implementation of the suggested landscape strategy principles would ensure the identified Special Qualities of both are conserved and, where possible, enhanced;
3. visually, the site is well-contained to the south and west by existing vegetation and topography;

- 4. it is possible to develop a scheme which provides new housing while respecting the sensitivity of the site and thereby minimising adverse effects on landscape character and visual amenity; and
- 5. in landscape and visual terms, the site has capacity to accommodate residential development following the landscape principles set out within the report, and as set out within the two masterplan options.

Highways Impact

A Transport Statement (2023) prepared by Bellamy Roberts is provided at Appendix 8 and has been prepared in response to the assertions in the Council's HELAA as to the unacceptable impacts of development of the site on the highway network. In summary this report concludes that:

- 1. the adjacent development at Sheffield Close (35 dwellings) was granted planning permission by the Council (Ref. 15/03320/OUTMAJ) in 2016 based on 2015 traffic survey data. Although some concern was expressed at the time by the Local Highway Authority in relation to the junction of Pangbourne Hill and the A340, this concern was not sufficient to warrant a recommendation to refuse the scheme;
- 2. Pangbourne Beaver Properties Ltd commissioned a traffic survey at the Pangbourne Hill / A340 junction in 2023 to allow a comparison between the baseline data in 2015 to support the approved (and now constructed development) at Sheffield Close and now;
- 3. the 2023 traffic survey confirms that the overall traffic flows through this junction have reduced when compared to 2015, in both morning and evening peak hour periods;
- 4. the introduction of new development on Site Ref: PAN8 would (assuming 100% of vehicles travelled via the Pangbourne Hill / A340 junction) increase flows by circa 21-25 vehicles (2-way). However, such an increase would still not result in flows at this junction at 2015 levels. In other words, current flows plus flows generated by the development of Site Ref: PAN 8 would not result in the traffic flows being greater than the 2015 flows;
- 5. consideration was also given to the accident rate at this junction and it was found there has been no material change in the number of accidents and circumstances that has occurred along the local road network between 2015 and 2023;
- 6. as such if the Local Highway Authority is to be consistent in its approach, it should reach the same conclusion as it did in 2015 i.e. that development can take place without unacceptable highways impacts;
- 7. the access to the site would be safe and suitable for all users; and
- 8. the traffic impact would not be severe and it would not be any worse than it was when permission was granted for 35 dwellings in 2015. As such in considering Site Ref: PAN8, there are no valid highway reasons to find the site suitable for residential development.

Conclusion

This representation and its associated appendices sets out why Policy SP15 of the Plan is unsound.

Policy SP15 fails to make any development allocations at Pangbourne despite the settlement's need for development, its inherent sustainability as a Rural Service Centre which benefits also from a railway station, and contrary to the Vision, objectives and spatial strategy set out in the Plan.

Whilst failing make any allocations at Pangbourne, Policy SP15 somewhat inexplicably makes a series of allocations in the North Wessex Downs AONB area at settlements that are significantly less sustainable than Pangbourne. Furthermore, these sites would have environmental impacts that are similar to or often greater than Site PAN8 at Pangbourne.

The allocation of PAN 8 would have the following benefits:

- provide either a senior living-led development or family housing including 40% affordable units in a sustainable location;
- pedestrian access to the village centre via the south east corner of Sheffield Close which links onto Pangbourne Hill;
- the existing woodland and boundary planting creates a well-enclosed site with limited impact on the AONB and in a well landscaped setting;
- existing overhead electricity cables that are visually intrusive and detrimental to the setting of the site can be placed underground; and
- an area of replacement grassland can be established to provide a replacement for the lost grassland and provide 10% biodiversity net gain.

We have additionally demonstrated that the reasons identified in the Council's HELAA for discounting Site Ref: PAN8 cannot be substantiated and as such provide no justifiable reason for not making this allocation at Pangbourne.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><Full Representation and appendices attached> For the reasons set out in these representations, the approach to housing provision in the North Wessex AONB area as set out in Policy SP15, which makes no provision for development at Pangbourne, is fundamentally unsound.</p>

	<p>It should be corrected through a review of the approach to the allocation of sites in the North Wessex AONB area and specifically, the allocation of Site PAN8 at Pangbourne, as the most sustainable location for development in this spatial area. We include a plan below, using the same style and legend as the other allocations in the Local Plan, to identify how this allocation might be taken forward in the Plan.</p> <p><i>See map of site in attached document 'Nexus obo Pangbourne Beaver Properties_SP15 Attachment part 1></i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	It is important for the Inspector to fully understand the existing flaws with the Plan with specific regard to Pangbourne. This can be best achieved by us presenting oral evidence to the Inspector.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Friday Street Developments Ltd (Represented by Pegasus Planning)
Consultee Full Name	Friday Street Developments Ltd
Consultee Organisation	Friday Street Developments Ltd
Agent Full Name	Henry Courtier
Agent Organisation	Pegasus Planning Group Ltd
Comment ID	PS1388
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 11:18:00
Attached Files	PS1388 Pegasus Planning (Friday Street) Full rep.pdf
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	Yes
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan</p>	Yes

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The Plan preparation has failed to adequately consider alternative and additional sites within the village of Bradfield Southend. The arbitrary cap placed on housing allocations within the village harms the viability of local shops and services.</p> <p>These representations make the case for consideration of an additional allocation of BRAD6 (Land at Ash Grove) within Bradfield Southend. Additional Landscape and Highways investigative works confirm that previous objections to the scheme can be suitably mitigated. The promoters support the concepts of the Plan, however differences in decision making question the overall soundness of the proposed strategy. The scheme has demonstrable and unique community benefits for the village which have been overlooked in favour of alternative sites. Benefits include:</p> <ul style="list-style-type: none"> • The donation of 0.46ha of land to Bradfield Church of England School • Potential highway safety improvements associated with a reconfiguration of the School site to allow drop-off / pick up onsite to alleviate congestion on Cock Lane. • Additional residents to halt the population decline and help safeguard the viability of shops and services within the village - including the school which is significantly under capacity. • Significant improvements to the woodland landscape buffer surrounding the site. • Retention of the paddock land to the northern part of the site. • <p>The site remains available and deliverable and the site promoters Friday Street Developments Ltd are keen to work collaboratively with the Council to bring the site forward in the early part of the Local Plan period.</p> <p>Introduction</p> <p>These representations have been prepared by Pegasus Group on behalf of our client Friday Street Developments Limited in respect of land to the rear of Ash Grove, Bradfield Southend ('the site'), as enclosed at Appendix 1 (Site Location Plan).</p> <p>These representations are submitted in response to the current West Berkshire Local Plan Review Regulation 19 'Proposed Submission' consultation, which sets out the Council's proposed approach to accommodating growth across the district over the next plan period (2022-2039) and identifies a number of sites for allocation to meet these needs.</p> <p>At this stage of the Local Plan Review preparation, the site is not proposed for allocation.</p>

The purpose of these representations is primarily to respond to the feedback given by the council at earlier stages of the Local Plan-making process and to reaffirm the deliverability (suitability, availability and viability) of the above site, to highlight the substantial benefits associated with the proposed scheme, and to make the case for additional housing allocations within Bradfield Southend. With consideration of this, it is proposed that the site be included as a mixed allocation for residential (up to 16no. dwellings) and educational land (0.46ha).

These representations build upon, and should be read in conjunction with, the previous representations made to West Berkshire District Council at prior stages of the Local Plan Review process as these highlight the overall benefits of the scheme. Notwithstanding this, the scheme has now evolved to be shaped by the feedback received from consultees and West Berkshire Council, and these representations highlight these changes which materially and positively impact upon the deliverability of the site.

The landowner is fully supportive of the broad concepts of the draft Local Plan, including the spatial strategy, settlement hierarchy and quantum of development across the district.

In particular noting that proposed housing targets are not capped and will therefore allow additional flexibility in housing delivery, especially where larger allocations do not come forward as anticipated. However, it is considered that the Council has failed to adequately assess the deliverability of the site (referenced within previous submissions as BRAD6) and the significant benefits the site can provide to the community as a whole.

These representations are made on the basis of further works which have been undertaken to demonstrate the deliverable benefits of the scheme for the local community and to nullify previous objections to the development of the site. In addition, the revised proposals for allocation reduce quantum of development to 16 dwellings in total to balance housing delivery with the constraints of the site and now includes the addition of approximately 0.46ha of education land.

This revised promotion illustrates that the delivery of the site would result in substantial and unique community benefits within the village. These include, but are not limited to, alleviated school congestion and improving pedestrian safety on Cock Lane, significant enhancement of the existing woodland buffer, and additional housing to secure the ongoing viability of the school and services within the village. These are achieved alongside the retention of the paddocks and donation of 0.46ha of adjoining land to the Primary School. The retention of existing paddocks and donation of land to the school is enabled by the concentration of residential development to the south-eastern corner of the site, a strategy which had been endorsed by previous Landscape Capacity Assessments undertaken for the Council. The proposed allocation presents an opportunity to not only deliver the benefits outlined above but also deliver these with minimal landscape impact upon the AONB.

Previous Promotions

The site has previously been promoted at each stage of the Local Plan Review preparation, including first through the West Berkshire Housing Site Allocations and Delivery Development Plan Document in 2014. The site was later promoted by Bell Cornwell, firstly at the Call for Sites in 2017 and later in earlier versions of the Local Plan Review, with the most recent in early 2021, the latter of which is included in Appendix 2.

As part of the Council's assessment of individual sites, a Sustainability Appraisal was carried out for each of the submitted sites. Feedback from the Sustainability Appraisal relating to the recent Regulation 18 stage of consultations is appended to these representations (Appendix 3) which will be responded to in this section. Although the site has been consistently promoted at earlier consultation stages of the Local Plan Review, earlier promotions on the site included a flexible-approach with the potential for a greater quantum of development, which, whilst flexible from the perspective of the landowner, overstated the detractions of the scheme and in turn outbalanced the potential of the site to deliver benefits due to uncertainty about how many dwellings the site could supply without unacceptable detrimental impact upon its surroundings.

As such, the promoters sought pre application advice in December 2021 in order to gain feedback from West Berkshire Council on the revised proposals. A pre application response was received from West Berkshire Council in March 2022 has provided additional detail and informed these representations.

Below is a summary of a selection of the responses to the 'Appendix 8b SA/SEA of New Residential Site Allocation Options' (included in Appendix 3) which forms part of the Council's evidence base for the draft Local Plan Review and includes a detailed assessment of each site. Positive and neutral responses contained within Appendix 8b have been omitted.

<Table 1: Key criteria highlighted in SA App 8b – see full rep attached>

The conclusions reached by the Council at earlier stages of representations found that much of the site could not be developed without having an adverse impact upon the surrounding landscape of the North Wessex Downs Area of Outstanding Natural Beauty

(NWD AONB). The landscape investigations did confirm that land to the south of a roughly horizontal line bisecting the site was developable without impact upon the surrounding landscape.

Detailed landscape, visual and capacity reviews were carried out by Liz Lake Associates in 2020 in response to earlier representations (Appendix 4). These assessments confirmed that the site has capacity for a moderate scale of development, subject to appropriate mitigation.

The LV&C assessment also gives a detailed overview of previous Landscape Capacity Assessments carried out for the Council. In these, the relationship of the site is considered to be acceptable and 'not considered to be a restriction on potential suitability'. In addition, the woodland boundary of the site is highlighted as a particular strength, helping to contain the site and reduce the impact upon outside views.

These demonstrated that part of the site could be developed with minimal impact to the surrounding landscape. Despite this, the Council neglected to allocate the site.

At each stage of the plan preparation, the site has been seen as undeliverable with sites in the west of the village being preferred for development as shown in Figure 1 below.

<figure 1 – see full rep attachment>

Pre-Application March 2022

A pre-application advice request was submitted in December 2021, with a response received in March 2022. This pre-application request was materially similar to the scheme, which is now being promoted, however amendments have been made to take account of Officers' responses.

Principle of Development

Officers note two alternative sites within Bradfield Southend at Stretton Close, one of which benefits from planning consent for 11 dwellings (17/03411/OUTMAJ) (now completed) and the second of which is proposed for allocation in the Local Plan for 20 dwellings (BRAD5). Officers are of the opinion that these two developments represent the maximum quantum of development that the village can presently handle, given its status as a Service Village. The following sections will challenge this opinion, and present material reasons to reconsider this arbitrary cap on development within the village.

Landscape

The pre-application response references the responses from Natural England received in previous representations. Namely, Officers referred to the encroachment into the AONB through 'incongruous extension beyond the settlement' which was not 'in keeping with the linear pattern of development'.

The emerging Local Plan states that the North Wessex Downs AONB covers approximately 74% of West Berkshire – with these areas managed carefully to conserve and enhance the natural beauty. Undoubtedly this places pressure on the availability of housing land across many of the towns and villages across the district and beyond. Indeed, Bradfield Southend is entirely encompassed within the AONB designation.

The Draft Policy SP2 outlines the strategy for protecting the natural beauty of the North Wessex Downs and outlines that:

"Development in the North Wessex Downs will be required to support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape",

"In determining what constitutes major development, the Council will consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development",

The reduced scale of development, as a result of the condensed form towards the southern extent of the site substantially reduces any potential for impact upon the landscape and scenic beauty of the AONB.

The Included Landscape Visual & Capacity Review prepared by Liz Lake (Appendix 4) provides a detailed response to the Council's 2015 Landscape Capacity Assessment. In Section 3.5 of the report addresses concerns raised by the Council in the 2015 Landscape Capacity Assessment and demonstrates a much reduced potential for 'harm' to the AONB's qualities with mitigations.

The LVC review also confirms that approximately 2.1ha of the site constitutes developable area, potentially supporting up to 48 dwellings at medium density on the site. The revised representations do not seek to fully exhaust this capacity, and instead take a cautious approach to conserving the landscape character with a lesser scheme of 16 dwellings. As for the rural economy, the population of Bradfield Southend is currently stagnating which brings into question the ongoing viability of the village's existing services and facilities. In particular the school, the public house, convenience store and Post Office. When considering the rural economy of the village it is important to note that this is not static, and services which exist now are not necessarily secured in perpetuity and requires sustainable growth in order to support the vitality and viability of the village.

Highways

Concerns over the deliverability of an adoptable access from Ash Grove/Cock Lane were voiced, owing to doubts over sight-lines to the left (east) and conflict with the existing access to Ash Grove.

The amended proposals include pedestrian and vehicular access through Ash Grove and as such no conflict exists onto Cock Lane. The Transport Statement (included in Appendix 5) prepared by Bellamy Roberts demonstrates that safe and suitable vehicular access can be achieved onto Cock Lane via Ash Grove. This includes appropriate visibility splays which properly consider 85th percentile speeds along Cock Lane. The proposed visibility splays are also demonstrated to be suitable for 30mph speeds, meaning any reduction to 20mph, as is commonplace outside schools across the district and the country, will go over and above highways standards. The Transport Statement confirms that safe and suitable access arrangements can be achieved for all road users, including pedestrians and vehicles, in accordance with current standards.

The scale of vehicular movements into and out of the site are estimated to be in the region of 5-8 vehicular movements during peak hours. Such movements can easily be accommodated within the existing road network. In addition to this, the Transport Statement concludes that there are genuine and realistic opportunities for residents and visitors to travel into and out of the site using sustainable and active modes of transport.

The scope for active transport modes will be detailed further in the coming sections of these representations.

Restrictive Covenants

The Local Plan evidence base (Strategic Housing Land Availability Assessment) identify that the site is subject to restrictive covenants which may impact upon the deliverability of the site. Whilst such covenants are linked to the land, this is not a material planning consideration and is a purely commercial matter which will be the subject of negotiations by the landowners and is something can be addressed once the planning potential of the site has been established. The covenants do not affect the deliverability of the site in planning terms, and certainly do not preclude development within the plan period.

Moreover, we note that a number of local sites have similar covenants and that the covenant on the local doctor's surgery has not prevented from the Council granting planning permission for two new dwellings at the site. In addition, the committee report for the relatively recent reserved matters application at Stretton Close (20/02410/RESMAJ) states, in paragraph 6.13:

"...a number of residents believe that no utilities can be laid underground across the application site due to restrictive covenants. The presence of effect of restrictive covenants are not a planning matter but a civil matter for the developer to address". (Emphasis added).

In addition, the existing development on Ash Grove (Nos 1-5) had the same covenants in place, prior to a negotiation by Tay Homes for their removal. Therefore, such a covenant did not prevent the delivery of housing at the site.

The site promoter understands that the covenant holder has a number of local land and property holdings and will be familiar with normal commercial negotiations over their removal, provided the planning potential is confirmed and community benefits of any scheme fully understood.

The landowners remain confident that the matter of the covenants can be reasonably resolved and are committed to actively promoting the site through the Local Plan-making process. We are confident therefore that there is no justification for the council citing covenants linked to the land as a reason for ruling the site out as a site allocation.

Design, Character and Appearance

Officers noted the reduced scale of development within the site, however referred back to the Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the

AONB (August 2015) which identifies that the southern extents of the site hold potential for development which would not significantly impact upon the North Wessex Downs AONB.

<Figure 2 – see full rep attached>

Officers also noted that the layout of the then-proposed dwellings still resulted in a significant northward extension to the village and represented a significant encroachment beyond the landscape capacity outlined in the 2015 LCA referred to above in Figure 2.

These comments have been carefully considered within the revised proposals and prompted further Landscape Capacity works which are included in Appendix 4.

These additional LVC works undertaken by Liz Lake Associates (Dated March 2020) demonstrate that the site has capacity over and above that which was indicated by the

Council's own assessments – with a potential capacity of up to 48 dwellings across part of the site. The 16 dwellings proposed for allocation represent a small portion of this potential capacity and are a cautious approach to conserving the landscape character of the AONB.

Other Allocations within Bradfield Southend

The Draft Local Plan includes a single allocation within Bradfield Southend, at Land North of Southend Road (BRAD5). This scheme includes 20 dwellings within a low-density scheme accessed from Southend Road.

Our client supports this allocation and recognises that each is not necessarily mutually exclusive, with more than one allocation able to demonstrate additional benefits for the village as a whole.

However, the soundness of the selection of BRAD5 over BRAD6 is questioned in light of the differences in the way the two sites (BRAD5 and BRAD6) have been scored within the evidence base. In the SA, both sites are scored on an almost identical basis, with only very minor differences between the two. These differences amount to just 3 categories: the ability of the site to reduce accidents and improve safety; the impact upon biodiversity and geodiversity and; the ability of the site to protect, conserve and enhance the built and historic environment.

Notable is the way in which both sites have scored poorly against landscape impact, with both requiring mitigations in order to enable development over part of the site. Natural England" that if required/needed only one site be brought forward for allocation. Their preference would be part of BRAD5." Reasoning for this is not substantiated, beyond the reference to the apparent landscape capacity indicated in the 2015 LCA. As previously stated, further landscape investigations undertaken by Liz Lake confirm a greater capacity for the site with appropriate mitigations and so this objection from Natural England cannot be substantiated.

Of particular note in the SA is the difference in assessing the potential for biodiversity and geodiversity conservation, with BRAD6 considered unlikely to have an impact upon biodiversity, benefiting from generous provision to enhance hedgerows and woodland planting, whilst BRAD5 was also assessed as unlikely to have an impact upon biodiversity in spite of the need to remove several TPO trees and hedgerows along the boundary of the site in order to gain access.

Despite clear differences in the sustainability of the locations of each site, the two are ranked as almost equally sustainable across the board.

The Transport Assessment (Appendix 5) confirms BRAD6 offers a realistic opportunity for future residents to use active and sustainable modes of transport for day-to-day needs within the village. To illustrate these differences, the differences in proximity to various local amenities is shown below. These clearly highlight that BRAD6 demonstrates a more sustainable location within the village when compared to a continued western expansion.

As shown above, each of the Village's key services are within proximity to Ash Grove, representing no more than a 5 minute walk. In contrast, BRAD5 and the continued expansion of the village to the west is concentrating housing development at a more remote distance to essential shops and services of the village. Development at BRAD6 would be closer to the functional core of the village and has a greater potential to reduce car use for day-to-day intra-village needs.

In addition, whilst the Transport Statement included with these representations confirms safe and appropriate access can be demonstrated to Cock Lane (via Ash Grove), there remain substantial questions over access to BRAD5, given the presence of a number of TPO trees and vegetation at the proposed access point. There also remain questions over whether access via the existing employment and small industrial estate are appropriate given the potential for conflict.

<Table 2 – see full rep attachment>

Summary

Whilst promoting BRAD6 for allocation, Friday Street Developments remain supportive overall of the allocation of BRAD5. However, it should be noted that the differences in assessing the two sites do raise questions into the soundness of the selection process.

Site Proposal & Benefits

The proposals have been amended in response to feedback provided by the Council and the Local Plan evidence base. The proposals now consist of a small development of 16 dwellings, focused within the southern half of the site to the rear of Ash Grove. This landscape-led approach reflects the findings of the Local Plan evidence base as referred to above, directing development towards the southern part of the site where capacity exists in landscape terms to ensure the development minimises impact on the surrounding landscape and AONB and sits comfortably within and contributes positively towards the character of the area.

<Figure 3 – see full attachment>

Other changes to the scheme include the removal of the previously included village green in response to pre-application advice advising that there exists sufficient open space provision within the village, particularly noting the extensive playing field provision towards the centre of the settlement. Whilst there was a clear aesthetic value to prospective residents, Officers questioned whether this would be considered as usable space, especially given the alternative options in the vicinity which would likely remain more attractive prospects for recreation.

The site promoters Friday Street Developments are keen to deliver a high quality scheme, addressing the unique local character of Bradfield Southend. Accordingly, each element of the revised indicative masterplan has been considered to address local constraints, and previous feedback received from the Council and consultees in order to present a deliverable concept for the site which is also capable of full compliance with all relevant emerging Local Plan policies, including in relation to biodiversity net gain, energy efficiency and sustainable design and construction.

School Land

Forming part of this proposed allocation is 0.465 ha of land to the north of the current Bradfield C of E Primary playing fields, which is proposed to be gifted to the school for their use. Whilst the land could be used for the school as they see fit, it is suggested a reconfiguration of the existing hardstanding areas would enable school drop off / pick up from the site and thus alleviate the current traffic problems causing highway safety concerns to Cock Lane.

As of November 2019, the school has approximately 159 pupils on roll¹, with many of these travelling in from outside Bradfield Southend. As a result, morning and afternoon peaks associated with the school run cause congestion on Cock Lane which was not designed with this volume of traffic in mind. Cock Lane itself only has a footpath on the eastbound side, meaning parents arriving in the westbound carriageway are forced to exit directly into the road and immediately cross to the footpath opposite. The existing school site is highly constrained, with very limited opportunities for reconfiguration within the existing boundaries to combat these issues.

As an interim solution, to discourage use of Cock Lane, the school have put in place a remote drop off point at Bradfield Village Hall which is accessed by a 250m pedestrian path which snakes around the community football pitches. This path was funded by the Parish Council, who acknowledged safety issues on Cock Lane and recognised the need to provide safe access.

The interim measure has alleviated traffic to some extent; however, this measure frequently fails when weather is poor, meaning for much of the time Cock Lane remains heavily congested during the school pick-up and drop-off times.

Being one of the only adjoining landowners with physical connection to the school grounds, there is limited alternative land available for the school's future growth. The proposed donation of land to the school represents a significant benefit of the proposals and could enable a partial reconfiguration of the site, including a potential expansion to the vehicular turning circle to improve capacity for onsite drop-offs / pick ups. Initial productive discussions have been held with the Oxford Diocesan Board of Education (ODBE), whom are receptive to the proposals and willing to enter into detailed discussions. Their full letter of support is included in Appendix 7.

Accordingly, the gifting of land to the Primary School could assist in improving highway congestion and safety for its pupils which is a material community benefit of the proposals which can only be provided through the allocation and delivery of BRAD6 to the rear of Ash Grove. In order to secure comparable benefits through other means, the school would have to consider relocation.

School Viability

In addition to the land donated to the school, allocating further residential developments within Bradfield Southend will increase the potential pool of pupils within the school's catchment area. Increasing the number of pupils enrolled supports the viability of the school for future and safeguards its continued operation.

The emerging Local Plan draft Policy SP23 states that 'New development will only be supported where infrastructure, facilities and services both on and off site, necessary to make the development acceptable, will be provided as and when appropriate. The Council will work with infrastructure providers and stakeholders to identify requirements for infrastructure provision and services for new development and will seek to co-ordinate infrastructure delivery, whilst protecting local amenities and environmental quality'.

The school is able to accommodate 30 students per year in single form entry, giving a total capacity of up to 210 pupils. The most recent Ofsted reports indicate that the school currently has 159 pupils on roll, which amounts to approximately 75.7% capacity utilisation.

Given that the Council aims to locate housing development in areas of infrastructure and service capacity, Bradfield Southend is currently an underutilised resource. At approximately 75% capacity, the school could accommodate over 50 additional pupils without the need for substantial capital investment. In addition, increasing the number of pupils on roll will help to safeguard the continued viability of the school, especially given that new-build housing tends to attract a younger family demographic.

Therefore, the allocation of an additional site within Bradfield Southend will not only provide the opportunity to alleviate existing highways concerns relating to the school but will also safeguard its continued provision for current and future residents of the village as a whole.

Development within Bradfield Southend

As of Mid-2020, Bradfield Southend is estimated to have a population of 7242. Using the average household size of 2.4, it is estimated that there are around 300 dwellings across the village. Therefore, the proposed allocation of an additional 16 dwellings comprises an approximate increase of less than 6%.

Additionally, ONS Data confirms that the population of the village is stagnating and on a steady downward trajectory - declining from approximately 769 in 2016 and continuing trends seen between the 2001 and 2011 Census³.

Despite other developments coming forward in Bradfield Southend, the population is set to continue on a downward trajectory. The addition of 16 dwellings in a sustainable village location could provide approximately 38 additional residents who will use the school, shops and local services helping to secure their ongoing viability.

These benefits can be secured in addition to the those proposed for allocation at BRAD5 – which itself has the potential for 20 dwellings, or approximately 48 residents at average occupancy levels. A fully complete and occupied BRAD5 would represent a flat population when compared to the 2016 mid-year population estimates. However, this does not allow for the length of time taken to build out, over which time the village population may continue to decline.

Notwithstanding the above, the potential for two allocations, BRAD5 and BRAD6 would bring controlled and proportionate growth to support the viability of services within the village. The provision of one site allocation for 20 dwellings (BRAD5) should not be seen as a cap to development within the village over the plan period. The current capacity within local services such as the School, mean that it cannot be argued that a moderate population increase would cause burden upon these services – to the contrary, these allocations will enable growth to support ongoing provision. The prospect of both allocations coming forward has a greater potential than either does individually to support and enhance the vitality of the village as a whole.

Woodland Buffer

The proposed allocation at BRAD6 will include both retention of the existing paddocks on the northern portion of the site, but also enhance the established woodland buffer which surrounds the parcel.

Enhancement of this woodland belt, as outlined in the LVC (Appendix 4) will further reduce the visual impact of both the proposed development and the existing settlement from views into the village. Over time, the growth of these additional trees and hedgerows will tightly enclose the site and provide a natural edge to the northern boundary of Bradfield Southend.

This retention and enhancement of the woodland boundary is capable of full compliance with draft policy DM15 which states that 'Development which conserves and enhances trees, woodland and hedgerows will be supported.'

Conclusion

This representation has been submitted on behalf of Friday Street Developments Ltd., in support of their land interest at

- Site Reference BRAD6: Land to the Rear of Ash Grove

The representations demonstrate the deliverability (sustainability, availability and viability) of the proposed allocation for 16no. dwellings plus 0.46ha of education land to be gifted to the adjoining Bradfield Southend Church of England Primary School, at the above site.

The representations have demonstrated that development in this location can have an acceptable visual impact upon the North Wessex Downs AONB.

Additional Transport assessments undertaken following prior rounds of consultation have demonstrated safe and appropriate access for all users is possible to Cock Lane via Ash Grove. The Transport Statement included with these representations confirm a policy and standards-compliant design is possible subject to detailed design.

In conclusion, Land to the Rear of Ash Grove (BRAD6) has the ability to deliver significant benefits to existing and future residents of Bradfield Southend. Highways congestion and safety improvements around Bradfield Southend Church of England Primary can only be feasibly delivered through a donation of land linked to the site and the proposed development.

Additional allocations within the village, over and above the single allocation at BRAD5, will safeguard the local shops, services and Primary School and reverse current downward demographic trends. These representations have confirmed that there is no justifiable reason to limit allocations within the village to a single site.

The site remains deliverable and available and represents a realistic prospect for development in the short-medium term, contributing towards West Berkshire's housing delivery in the earlier stages of the Local Plan period.

	Attachment: Full rep inc. appendices.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Additional allocation of residential sites within the village of Bradfield Southend in order to better support local services. Proper consideration of BRAD6, to take account of the proposed benefits to highways safety on Cock Lane and the donation of land to Bradfield Church of England primary school, both of which are unique to the scheme. Due consideration should be made to the revised proposals for 16 units, which is demonstrated to have a minimal impact upon the AONB and character. Please see full representations for further information.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To illustrate the need for an additional allocation in Bradfield Southend in light of the above.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1531
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf Croudace Homes Combined Appendices.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>[See attached Combined Appendices for appendices. For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>Local Plan Review Allocations</p> <p>The Council proposes to allocate the sites listed at Table 7 for residential development. Croudace's analysis of the proposed allocations and their ability to deliver completions is summarised alongside each relevant allocation, with further analysis contained within the subsequent paragraphs.</p> <p>Proposed New Allocations</p> <p>The LPR proposes to allocate nine new sites for residential development to bring forward an estimated 1,720 units. It also delegates the allocation of land for 80 units upon adoption of two respective Neighbourhood Plans.</p> <p>Other New Allocations (Draft Policies SP13, SP14 and SP15)</p> <p>Croudace notes that draft allocations are proposed in each spatial area. However, some of these sites are subject to constraints which should see them removed from the LPR as their development is likely to be impeded.</p> <p>For example, the following sites are within the River Lambourn Special Area of Conservation ('SAC') – an area constrained by issues surrounding nutrient neutrality as marked on the draft Policies Map:</p> <ul style="list-style-type: none"> – RSA17: Land at Chieveley Glebe (15 units); – RSA19: Land West of Spring Meadows, Great Shefford (15 units); – RSA22: Land Adjacent Station Road, Hermitage (34 units).

In addition, 25 units are proposed to be delegated by the LPR to come forward via a Neighbourhood Plan at Lambourn; a Neighbourhood Area highly constrained by nutrient neutrality issues.

As explained by Natural England, “nutrient neutrality is a means of ensuring that a development plan or project does not add to existing nutrient burdens within catchments, so there is no net increase in nutrients as a result of the plan or project”.

Planning applications submitted in areas affected by nutrient neutrality must be accompanied by a Habitat Regulations Assessment (‘HRA’) which demonstrates that there is no effect on the level of nutrients within watercourses. Where there is a negative effect on nutrient levels, mitigation strategies must be secured.

It is our understanding that mitigation strategies (likely to be in the form of a scheme enabling developers to purchase ‘nutrient credits’) are not currently well advanced, and until they are, it is the case that development in affected areas is effectively ‘on-hold’ unless nutrient neutrality can be demonstrated.

Croudace does not consider the proposed allocation of sites in areas which are so heavily constrained by an issue which is unlikely to be resolved in the short term to be a ‘justified’ or ‘effective’ strategy. Nutrient neutrality is a complex matter, and a resolution is likely to mean that development in nutrient neutrality zones is impeded for long enough to delay delivery of housing beyond a five year period.

On that basis, Croudace considers that the Council should remove draft allocations RSA17, RSA19 and RSA22 and the reliance on the Lambourn Neighbourhood Plan. The effect of this would be to **reduce the claimed supply by 89 units**.

Part of this shortfall could be made up by proposing alternative allocations on unconstrained sites, such as Henwick Park, which is not impacted by nutrient neutrality issues.

Sites Allocated for Residential & Mixed-Use Development in the North Wessex Downs AONB (Draft Policy SP15)

Croudace notes the proposed draft allocation of five new sites to deliver a total of 104 new dwellings within the North Wessex Downs AONB:

- RSA16: Land north of South End Road, Bradfield Southend (20 units)
- RSA17: Land at Chieveley Glebe (15 units);
- RSA19: Land west of Spring Meadows, Great Shefford (15 units);
- RSA22: Land adjacent Station Road, Hermitage (34 units);
- RSA23: Land adjacent to The Haven, Kintbury (20 units).

In addition, a further 80 dwellings are proposed to be delegated by the LPR to come forward through neighbourhood plans at Hungerford and Lambourn – both Neighbourhood Areas are within the AONB.

Croudace considers the AONB to be a sensitive location for this scale of growth proposed given its inherent special characteristics. Whilst Croudace is supportive of the need to support the vitality and viability of rural settlements, which may be achieved via the delivery of housing, this should only be essential and directly linked to the needs of the relevant settlements.

The NPPF states at paragraph 176 that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited.

Croudace has previously undertaken an assessment of four of these sites within its representations to the Regulation 18 stage (Appendix G).

It was concluded that sites RSA16, RSA17 and RSA19 are not suitable for development, owing to landscape impacts and thus all three should be removed from the Council’s assumed housing supply – this would equate to the removal of 50 units. RSA23 was considered only to be developable in part and therefore this site’s yield should be reduced to 10 units, rather than the 20 identified in the LPR.

Removal of inappropriate allocations in the North Wessex Downs AONB should therefore necessitate the removal of a total of 60 units from the Council’s assumed supply. In addition, the 55 units directed to the Hungerford Neighbourhood Area should also be removed given the extent to which the NPPF and the LPR’s objectives seek to protect the AONB.

However, as set out above, we have already recommended that sites RSA17 and RSA19 (delivering 30 units), and the 25 units to be delivered through the Lambourn Neighbourhood Plan, be removed from the Council’s claimed supply due to their potential to be impacted by nutrient neutrality.

Croudace therefore considers that 85 units should be removed from the Council’s claimed supply (arising from 55 Neighbourhood Plan units, the removal of the allocation at Land North of South End Road, Bradfield Southend (20 units) and the reduction of the allocation at Land adjacent to The Haven, Kintbury (reduced from 20 units to 10 units)).

Part of this shortfall could be made up by allocating land at Henwick Park for development. Henwick Park lies entirely outside of the AONB and its development would not generate adverse landscape impacts. Its location on the edge of Thatcham, which is a highly sustainable settlement, should be preferred over the proposed allocations within the AONB.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	

4. Proposed Changes	<p>A reduction of the level of growth proposed in the North Wessex Downs AONB– the AONB is offered the highest level of protection by national planning policy and therefore the Council should not be seeking to direct any more growth to it in preference to other less constrained areas than is absolutely essential. To do so is not ‘justified’ or ‘consistent with national policy’. Croudace’s assessment of the sites proposed for allocation within the AONB shows that they are largely unsuitable for development in any event and therefore the proposed allocations should be removed from the Council’s claimed housing supply.</p> <p>The removal of allocations in areas affected by nutrient neutrality– the LPR proposes new allocations in areas affected by nutrient neutrality, and proposes to carry forward HSA DPD allocations affected by the issue. Croudace does not consider it to be a ‘justified’ or ‘effective’ strategy to rely on sites which have uncertain delivery timeframes to deliver housing in areas which need delivery early in the plan period. By opting to allocate such sites, the Council risks restricting the supply of housing and forcing itself into a position where it may not be able to demonstrate a 5YHLS soon after adoption of the LPR.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1778
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	Englefield Estate cover letter REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>LPR paragraph 6.23 identifies a need for an additional 1,809 dwellings to 2039, taking into account existing commitments for 7,337 dwellings. Notably the existing commitments includes 1,580 dwellings at Sandleford Park, which was allocated in 2012 and has only recently been granted planning permission, and a large proportion (1,949 dwellings) at windfall sites which do not have planning permission, and so it is questionable whether all of the existing commitments will be delivered during the LPR plan period. It is therefore considered that an additional supply of housing is likely to be required in the LPR, above the stated requirement of 1,809 dwellings, which could be met through smaller sites distributed throughout the District to avoid similar delays to that experienced at Sandleford Park. It is important that the LPR identifies a sufficient supply of deliverable sites to meet the local housing target, taking into the previous shortfall in delivery and the potential that identified sites do not come forward as envisaged.</p> <p>It is noted that draft LPR Policies SP13-SP15 make provision for 1,720 new dwellings (as referred to at paragraph 6.24), with 80 dwellings proposed to be allocated at neighbourhood plans (as referred to at paragraph 6.25), below the stated outstanding requirement for 1,809 dwellings. It is therefore crucial that additional housing sites are identified in order to meet the LPR housing target (with a need for more housing sites to be identified given the comments raised above regarding the existing commitments).</p> <p>The NPPF also emphasises that small and medium sites 'can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly' (paragraph 68). Indeed the Estate's landholdings across the eastern part of the District include a number of small and medium land parcels (as noted further below) which are suitable to accommodate sustainable development and contribute to the District's housing land supply. This includes the Estate's land at Burghfield Common, Theale and Mortimer as noted further below. A number of these sites are currently located within the DEPZ, however should this change during the plan period (as noted above) and additional housing be required, these sites are well placed to accommodate this need.</p> <p>Development Opportunities</p>

	<p>Englefield</p> <p>Englefield village comprises a sustainable rural community within the district with a range of local community services and facilities. The current local planning policies that apply to the village are restrictive of development and this is reflected in the amount of new development that the village has experienced in recent years. As such there is very little inward migration of new families to the village and, together with a lack of employment opportunities, the resultant trend is towards an ageing population. This threatens the medium to long term economic and social viability of the village and its community, in particular the survival of core services. It is however considered that, together with updates to draft LPR policies above, opportunities exist within the village (e.g. HELAA site refs. ENG1, ENG2 and ENG3) to ensure that it remains a diverse, vibrant and rural community with a mix of housing, employment and education which sustains the community and contributes to meeting the needs identified in the LPR.</p> <p>Bradfield Southend</p> <p>The Estate's landholdings at Cock Lane, Bradfield Southern (ref. BRAD4) is situated within the existing settlement boundary of Bradfield Southend, and is less than 5 minutes' walk from all the services and facilities within the village (including educational, retail and community facilities). The site is located within the North Wessex Downs AONB, which washes over the entirety of the settlement, however in all other respects, the site is not constrained environmentally. The site is therefore situated in a sustainable location could accommodate in the region of 4-5 dwellings to meet local needs.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	Policy SP13-15 and the supporting text as currently worded do not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, in order to ensure the soundness of the Plan, additional housing sites should be identified to ensure that local housing needs are met. This should include consideration of small and medium sites at Burghfield Common, Theale and Mortimer.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	

Comment ID	PS1423
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Allocations are too restrictive.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Allocations should be reviewed and increased where they would be sustainable and compliant with other policies in the plan
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1621
Chapter / Policy / Appendix Number	Policy SP 15
Chapter / Policy / Appendix Title	Sites allocated for residential development in North Wessex Downs AONB
Order	52
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	<p>Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>INTRODUCTION</p> <p>Context</p> <p>Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. The Site Location Plan is provided at Appendix 1: Site Location Plan.</p> <p>Sovereign holds a specific land interest within West Berkshire, known as Land adjoining The Haven, Kintbury ('the site'). These representations are aligned with this land interest and address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base, accordingly.</p> <p>The site has been assessed by West Berkshire District Council ('the Council') within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. Furthermore, the site is proposed for allocation within the Local Plan Review document, to accommodate residential development, under proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.</p> <p>The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness, as set out at paragraph 35 of the NPPF; namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:</p> <ol style="list-style-type: none"> a) Positively prepared – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs. b) Justified – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. c) Effective – deliverable over the plan period and based on effective joint working. d) Consistent with national policy – enabling the delivery of sustainable development. <p>At this stage of the plan-making process, it is essential that West Berkshire District Council ('the Council') continues to pursue an approach that is consistent with national policy, effective, justified, and positively</p>

prepared. These representations comprise our recommendations to assist the Council in achieving such an approach, as emerging plan progresses toward adoption.

These representations build upon and should be considered in conjunction with the previous representations submitted by Sovereign to the 'Regulation 18' consultation on the West Berkshire Local Plan Review 2020 – 2037: Emerging Draft (December 2020), which ran from 11 December 2020 to 5 February 2021.

Policy Context

The Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council then adopted the Housing Site Allocations Development Plan Document in May 2017, to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the district therefore sets out the spatial strategy to meet development needs up to 2026 and provides a series of site allocations and planning policies that seek to deliver that strategy.

To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The draft plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption, which is anticipated in 2024.

Sovereign **supports** the Council's commitment to review the existing development plan through this process.

THE SPATIAL DISTRIBUTION OF HOUSING

Supporting the Vitality and Viability of Rural Villages

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

In accordance with the discussion set out previously, in Section 3 of these representations, Sovereign recommend that any appropriate spatial strategy for West Berkshire must include the allocation of land to provide sustainable development at different levels across the current settlement hierarchy and within the different Spatial Areas.

Such an approach would align with the general principle of the district's existing spatial strategy, which would support the sustainable growth of the larger settlements, whilst providing sufficient growth for the abundance of medium and smaller-sized villages in the district to support their sustainable growth.

This strategy would also accord with paragraph 78 of the NPPF, which states:

"Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."

Reductions in average household sizes, alongside low housebuilding rates, present a challenge for rural communities. Without an appropriate uplift in the level of development in these locations, there is a risk that local services in such areas would become unviable, undermining the vitality and sustainability of the district's rural villages.

In addition to helping maintain the vitality of the district's villages, medium and smaller-scale development in appropriate locations will assist with the district's housing delivery, both in the short-term and over the life of the plan period.

Paragraph 68 of the NPPF states that local planning authorities should promote a good mix of sites, with small and medium sites often able to be built out relatively quickly. This is supported in research conducted by Lichfields [Footnote 14: Available online at: <https://lichfields.uk/content/insights/start-to-finish>], which reports that schemes of 500 dwellings or more take on average between 5 to 8.4 years from the validation of an application for outline planning permission to the delivery of the first new home. The consequence being larger sites, such as the proposed strategic allocations, typically only substantively contribute to new housing delivery later on in the plan's lifespan.

As such, Sovereign **supports** the Council's commitment to allocate sufficient small and medium sized sites to maintain housing delivery throughout the plan period. Furthermore, Sovereign encourages the Council to seek to secure efficient delivery of new homes from any future proposed site allocations, i.e., maximising development potential whilst ensuring appropriate local character and context are respected. This would be particularly important for the smaller and medium-sized sites, which would help to ensure the district meets its housing needs in the shorter-term.

Development in the North Wessex Downs AONB Spatial Area

In seeking to identify sufficient development sites to meet the district's local housing needs, the Council has sought to accommodate a modest amount of new homes (approximately 8% of the overall need) within the North Wessex Downs AONB.

The NPPF, at paragraph 174, sets out that *"Planning policies and decisions should contribute to and enhance the natural and local environment by: [inter alia] protecting and enhancing valued landscapes"* such as the country's Areas of Outstanding Natural Beauty. Furthermore, the NPPF clarifies, at paragraph 176, that *"Great weight should be given to conserving and enhancing landscape and scenic beauty in [...] Areas of Outstanding Natural Beauty"*.

Given the significant housing need within the district, as set out in the previous discussion, there is clearly a need to accommodate a modest amount of residential development within the North Wessex Downs AONB Spatial Area. Sovereign **supports** the Council's proposed spatial strategy, in which a modest amount of new homes are proposed to support local communities within the area.

Furthermore, in determining appropriate locations to accommodate residential development within the North Wessex Downs AONB Spatial Area, Sovereign considers that the Council has clearly had due regard to the conservation and enhancement of the landscape and scenic beauty of the AONB, in accordance with Paragraph 176 of the NPPF.

The Council assessed parcels of land within the North Wessex Downs AONB Spatial Area through the Landscape Character Assessment ('LCA') and Landscape Sensitivity Assessment ('LSA') processes, which informed the Council's assessment of the potential *suitability* of sites for residential development. This assessment is set out within the Council's HELAA (2023). The Council concluded that, taking account of the LCA/LSA process, several parcels of land within the AONB could be appropriate to accommodate development, subject to various recommendations to maintain and enhance the landscape and scenic beauty of the AONB, as set out in Policies SP2, SP15, and, in relation to the Land adjoining The Haven, Kintbury, RSA23.

Consequently, the proposed site allocations represent locations where development can best be situated within the landform, or best relate to the existing built form, or are enclosed by substantive established native deciduous tree cover, of value in its own right. As such, Sovereign considers that the proposed allocations sufficiently ensure that the special qualities of the AONB, and the settlements that sit within it, can be appropriately conserved and enhanced.

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

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

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

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

DEVELOPMENT MANAGEMENT POLICIES

The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.

Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.

As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria and sub-criteria. this would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Yes

Please give reasons for your answer

Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.

3. The Duty-to-Cooperate

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

Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.

Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation

	<p>of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
4. Proposed Changes	<p>Policy SP15: Sites allocated for residential development in the North Wessex Downs AONB</p> <p>To ensure consistency within the document, it is recommended that additional wording is included within Policy SP15 to confirm that the identified capacity for each allocated site represents an approximate capacity and not a cap, as set out in Policy SP12:</p> <p>i) Development in the North Wessex Downs <u>AONB</u> <u>is</u> <u>will be allocated for the approximate number of homes</u> as follows:[...]</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS170
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandlesford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This section is not consistent with the outline planning consent for 1000 houses for the (eastern) Bloor Homes part of the site. This consent does not include or permit a connection with the (western) Donnington New Homes part, nor an exit via Warren Road, and it must be assumed that those constraints will continue. The statement that the site is for 1500 houses, with an exit via Warren Road, is therefore not correct. A reversal of this policy would cause unacceptable congestion to the regular Andover Road traffic.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Rivar Ltd (Represented by Pro Vision)</p>
<p>Consultee Full Name</p>	<p>Rivar Ltd</p>
<p>Consultee Organisation</p>	<p>Rivar Ltd</p>
<p>Agent Full Name</p>	<p>Gareth Johns</p>
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS573</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 16</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Sandleford Strategic Site Allocation</p>
<p>Order</p>	<p>57</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other</p>	<p>E-Mail</p>

* SMS * Web * Unknown	
Response Date	02/03/2023 09:37:00
Attached Files	Pro Vision (Rivar) full response.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Please see accompanying statement for our full representations. It is considered that the housing delivery of 1,580 dwellings at Sandford Park during the plan period is questionable. (Full representation attached, but does not make specific comments on this consultation point)
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Please see accompanying statement for our full representations.

	In brief, it is considered that the Council should take a cautious approach with the delivery of Sandford Park during the plan period. The Regulation 18 Consultation on the LPR noted that Sandford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy. <Full response attached>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jarman, Alastair
Consultee Full Name	Mr Alastair Jarman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS359
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 18:08:09
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	No

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>P16: The inclusion of Warren Road as an all-vehicular access route from its originally intended function as a "sustainable" transport link is in conflict with DM 8 Air Quality sub-sections e: and h: From DM8 "e. It does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" "h. It provides opportunities to improve air quality, reduce airborne emissions, and where necessary mitigates impacts, including measures such as the provision and enhancement of green infrastructure, active travel, and other traffic and travel management."</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Charlesgate Homes Limited
Consultee Full Name	Mr Joe Atkinson
Consultee Organisation	Charlesgate Homes Limited
Agent Full Name	
Agent Organisation	
Comment ID	PS699
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	This site has been looked upon as a favourable site since 2000, it was allocated in the last plan for circa 2000 houses, now it is down as 1500 houses, the highways dont appear to support the scheme and yet there appears to be heavy reliance on this site again to deliver a significant number part of WBC housing numbers. At what point will WBC seek alternative options to this site that clearly has delivery issues
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	Start to consider smaller sites with less reliance on multiple land owners, hugh amount of infrastructure commitment that clearly cant be met on this site
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Town Council
Consultee Full Name	Mr Hugh Peacocke

Consultee Organisation	Newbury Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS576
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 10:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>The Planning and Highways Committee of this Council considered the above matter on Monday 20 February.</p> <p>The meeting considered Policy SP 16, "Sandleford Strategic Site Allocation" and expressed concerns around the environmental and traffic impacts of the proposals. It was noted that outline planning permission had been granted for 1,000 homes, while SP 16 proposed the delivery of 1,500 dwellings on the lands. It was suggested that if the allocations suggested in the resolution regarding SP 12 above were taken into account, that the additional 500 homes would not be required on this greenfield site.</p> <p>The meeting resolved that Newbury Town Council opposes the Sandleford West development (an additional 500 homes on the Sandleford strategic site) as Warren Road cannot be used to access these lands.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Racecourse (Represented by Pro Vision)
Consultee Full Name	Newbury Racecourse
Consultee Organisation	Newbury Racecourse
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS526
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	02/03/2023 15:14:00
Attached Files	Pro Vision (Newbury Racecourse).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Please see accompanying statement for our full representations. It is considered that the housing delivery of 1,580 dwellings at Sandleford Park during the plan period is questionable. <Accompanying statement attached, but does not include any specific comments on this consultation point>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Please see accompanying statement for our full representations. In brief, it is considered that the Council should take a cautious approach with the delivery of Sandleford Park during the plan period. The Regulation 18 Consultation on the LPR noted that Sandleford Park was

	expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy. <accompanying statement attached>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS709
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park West (SPW)</p> <p>Clearly our client supports Policy SP16: Sandleford Strategic Site Allocation. As drafted however, the Policy is unclear in relation to the requirement for Flood Risk Assessment whereby the Policy states that 'a detailed flood risk assessment with hydraulic modelling will be required for the whole site'. It is very common for a site of this scale to be under multiple ownerships / control and not uncommon for separate flood risk assessments (FRA) to be prepared by each applicant depending on the ability to manage water on land within their control. As drafted, the Policy could be interpreted to require a full site (i.e. all land within the red line accompanying Policy SP16) FRA to be submitted in all circumstances, regardless of which land / parcel of land an individual planning application relates to. This is unnecessary. It is entirely reasonable and appropriate for a FRA to relate only to land within a red line submitted with a planning application and, subject to that FRA taking into account the circumstances (such as levels, gradient, ground conditions), at a reasonable scale, of surrounding land, that FRA should be considered acceptable and allow a parcel of land within a wider site / allocation to come forwards (as has happened, with the Secretary of State's approval, for that part of Sandleford Park controlled by Bloor Homes). Accordingly, Policy SP16, should be amended, to be clearer that a FRA for "the site" need only to relate to the land within a red line submitted with any given planning application.</p> <p>There is a requirement for the wording within the Policy to be further amended to clarify the requirements in relation to housing mix. As currently drafted, the Policy requires that there should be an emphasis on homes with at least 3 bedrooms. It is entirely reasonable to expect that the housing mix requirements within the District may change over the Plan period and accordingly, Policy SP16 should be clearer that the housing mix should respond appropriately to the SHMA (or other relevant housing needs assessment) requirements relevant at the time an application is considered.</p> <p>In relation to the red line plan contained within the Plan relating to Sandleford Park, it is unclear why the Council has excluded land to the rear / south of Ashton House and Lynwood House at the eastern end of Warren Road from the allocation. That land falls within my clients control, and has previously been included in planning application proposals for the Sandleford Park West site. It has no significance in relation to ecology, heritage or other constraint that may require it to be free from development. It is not, therefore, clear why the Council has excluded it from the allocation in the Plan and accordingly, the red line plan should be amended to include that land. Should the Council require clarification on the precise extent of this area of land, my client would be pleased to provide it.</p> <p>We note that the Reg 19 Plan is consistent with the adopted Core Strategy in excluding Warren Road, west of the entrance to New Warren Farm, from the allocation boundary and this is supported.</p> <p>The boundary line of the allocation across the south side of Eastern Fields within Sandleford Park West should also be reviewed. The plan contained within the red line includes a 'kink' part way across Eastern</p>

	<p>Fields. This doesn't appear to tie in with any notable features on the ground and does not accurately represent the land my client has promoted or sought planning permission for. The site location plan submitted with my client's planning application on the land shows a straight line across the boundary of this part of the site. The plan within emerging Local Plan should reflect that position.</p> <p>There may also be issues around the definition of the red line plan relating to Sandlesford Park Strategic Site on the eastern boundary adjacent to A339 and north of the recycling centre. The Core Strategy Plan, and the red line plan relating to planning permission 20/01238/OUTMAJ (Bloor/SFP) include the balancing pond directly west of the A339 and north of the recycling centre. The site access plans approved by the SoS through planning permission ref 20/01238/OUTMAJ show the site access north of that balancing pond. We suggest that the Council should review the site allocation red line in this area to ensure consistency.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cooper, David
Consultee Full Name	David Cooper
Consultee Organisation	Say No to Sandlesford
Agent Full Name	
Agent Organisation	
Comment ID	PS468
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandlesford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	28/02/2023 20:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I write on behalf of the campaign organization SayNoToSandleford (SNTS) in relation to the above document. We have the following comments on the following specific policies.</p> <p><u>Policy SP16 (Sandleford Strategic Site Allocation)</u></p> <p>SP16: Comment 1</p> <p>We request that the underlined text below be removed. The junction of Andover Road and Warren Road is unsuitable for all vehicle access, due to presence of schools and churches in the vicinity. Any vehicular access should exclude private cars and larger vehicles apart from buses.</p> <p>Four primary all vehicle accesses: Two off Monks Lane; <u>One through to Andover Road via Warren Road; and</u> One onto the A339.</p> <p>SP16: Comment 2</p>

	<p>We request that the underlined text below be changed to: “buffers of at least 15 metres”, in order to avoid direct damage to the root system.</p> <p>Conserve the areas of ancient woodland and provide <u>appropriate buffers</u> between the development and the ancient woodland;</p> <p>SP16: Comment 3</p> <p>Further SP16 is in conflict with DM8 (Air Quality) para e.</p> <p>1 e) It should not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;</p> <p>By changing the sustainable transport link via Warren Road to a main access route, vulnerable users will be subjected to additional air pollution. In particular PM2.5 which is now linked to major health and development issues in young people. With 2 schools and 2 churches in this area already, and additional school planned, this seem both counter intuitive and irresponsible.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Saunders Family (Represented by Southern Planning Practice)
<p>Consultee Full Name</p>	Saunders Family
<p>Consultee Organisation</p>	Saunders Family
<p>Agent Full Name</p>	Alice Drew
<p>Agent Organisation</p>	Southern Planning Practice Ltd
<p>Comment ID</p>	PS243
<p>Chapter / Policy / Appendix Number</p>	Policy SP 16
<p>Chapter / Policy / Appendix Title</p>	Sandleford Strategic Site Allocation

Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	No further comments – we still object to the proposed allocation due to its history and unrealistic prospect of coming forward in the plan period.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hampshire County Council
Consultee Full Name	Hampshire County Council
Consultee Organisation	Hampshire County Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1075
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 22:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>Thank you for consulting Hampshire County Council on the West Berkshire District Council Local Plan. The County Council in its capacity as a neighbouring highway authority has focussed this response on the potential implications of the Sandleford Strategic Site (SP16) on the A339 within Hampshire.</p> <p>It is noted that there are other local infill and strategic sites which may lead to increased flows on the A339, but Sandleford is likely to have the biggest impact by virtue of its location. It is also noted that the site allocation for Sandleford extends down to the Hampshire border, although the development is likely to actually be focused in the north and west of the site.</p> <p>It is proposed that there will be four all-vehicle accesses to this strategic site, one being from the A339. Whilst the part of the A339 that the site access is likely to be achieved from would be outside of Hampshire's boundary, the impact on the A339 within Hampshire must be considered.</p> <p>Policy DM2 of Hampshire County Council's emerging Local Transport Plan 4 (LTP4) states '<i>we will only support requests for NEW accesses onto A roads, the principal road network or traffic sensitive streets where the strategic flow of traffic is prioritised and not compromised and when all other reasonable options (such as taking access from nearby side roads) has been considered.</i>'</p> <p>Therefore, for Hampshire County Council to support the proposal for a new access onto the A339 it should be demonstrated that the strategic flow of traffic is prioritised and not compromised, and when all other reasonable options (such as taking access from nearby side roads) has been considered.</p> <p>It should be noted that the A339 is an ex-trunk route, and it is Hampshire County Council's view that strategic traffic should be routed via the A34, therefore any evidence provided to demonstrate the suitability of a new access onto the A339 should take account of this position and consider wider strategic routes to and from the site.</p> <p>As further modelling work is done to underpin development in West Berkshire where cross boundary impacts are a possibility, but in particular Sandleford, Hampshire County Council would like to work closely with West Berkshire District Council to discuss modelling parameters and underlying assumptions.</p> <p>Hampshire County Council is particularly interested in understanding how the cumulative impacts of cross boundary traffic flows have been taken into account, i.e. whether new allocations outside of the West Berkshire boundary have been taken into account, or if the modelling rests on assumptions of background growth.</p> <p>Hampshire County Council also take this opportunity to point out that the North Manydown site of up to 3,500 homes on the north west side of Basingstoke will have direct access to the A339 and so this may have an impact on background traffic flows. Moreover, under the West Berkshire Local Plan policy SP12 there is a relatively large allowance for windfall sites to help West Berkshire District Council reach its housing supply (1,949 net additional homes out of a total of up to 9,146). Hampshire County Council would like to be involved in discussions where sites are planned adjacent to the common border between Hampshire and West Berkshire.</p> <p>Of note is the strategic transport study focusing on potential future improvements to the A339 that Hampshire County Council, Basingstoke and Deane Borough Council and West Berkshire District Council have been working together to manage. Hampshire County Council note that if West Berkshire District Council chooses</p>

	<p>to safeguard land for the measures emerging from the study in the region of the Sandleford development, with a view to taking these forward, Hampshire County Council would want to discuss the impacts on Hampshire's highway network and the redistribution of traffic across the strategic network. From the high level study and modelling work done thus far Hampshire County Council are not currently satisfied that the measures suggested would achieve the aims of reducing through traffic and could serve to bring additional traffic demand to the A339.</p> <p>Finally, the designation of Greenham business park as a Designated Employment Area is noted. It is recognised that it is already a well-established employment area but given policy DM32 that <i>'the redevelopment and regeneration of land within DEAs to provide additional business development that meets the needs of the District will be supported'</i>, Hampshire County Council would like to be involved as a stakeholder in any discussions regarding any potential changes which are likely to affect traffic flows of heavy vehicles which utilise the A339 in accessing or departing from the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	The Woodland Trust
<p>Consultee Full Name</p>	Ms Bridget Fox
<p>Consultee Organisation</p>	The Woodland Trust
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS853
<p>Chapter / Policy / Appendix Number</p>	Policy SP 16
<p>Chapter / Policy / Appendix Title</p>	Sandleford Strategic Site Allocation
<p>Order</p>	57
<p>Submission Type * E-Mail * Letter * Other * SMS</p>	E-Mail

* Web * Unknown	
Response Date	03/03/2023 00:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	The policy requires protection for the ancient woodland, in line with the NPPF. We welcome the wording requiring: <i>A network of green infrastructure to be provided which will:</i> <i>Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland;</i> <i>Mitigate the increased recreational pressure on nearby sensitive wildlife sites, secure strategic biodiversity enhancements</i>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As noted above, the policy includes wording for protection for ancient woodland, in line with the NPPF. It is important that this wording is included for the Local Plan to be effective and consistent with national policy. This is a major site, allocated for residential development of 1500 dwellings. The site contains seven areas of ancient semi-natural woodland: - Crooks Copse (SU46936508) ASNW 2.31 Ha - Barn Copse (SU46336474) ASNW 2.45 Ha - High Wood (SU46646473) ASNW 0.27 Ha - High Wood (SU46786472) ASNW 2.68 Ha

	<ul style="list-style-type: none"> - High Wood (SU47086462) ASNW 8.92 Ha - Dirty Ground Copse (SU46716448) ASNW 2.55 Ha - Unnamed (SU46716387) ASNW 5.42 Ha <p>It also includes the following significant trees which require protection (Ancient Tree Inventory IDs given):</p> <ul style="list-style-type: none"> - Ancient tree (Pedunculate Oak) ID: 150885 - Veteran trees (all Pedunculate Oaks) IDs: 159632, 150908, 150907, 150906, 150933, 150936, 150938, 150939, 150896, 150898, 150899, 150900, 150901, 150902, 150903, 150904, 150929, 150940, 150941, 150942, 150943, 150884, 150883, 150882, 150881, 150875, 150879 - Notable Trees (all Pedunculate Oaks) IDs: 150937, 150897, 150880.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	n/a
4. Proposed Changes	Propose amending the wording <i>A network of green infrastructure to be provided which will:</i> <i>Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland;</i> To read <i>A network of green infrastructure to be provided which will:</i> <i>Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland, and appropriate Root Protection Areas for ancient & veteran trees;</i> This will make the policy more robust in delivering the same protection for important trees as ancient woodland, as required by the NPPF
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	n/a
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1010

Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure. The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water

supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>No</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS837
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point. SP16 – SANDLEFORD STRATEGIC SITE Despite the Appeal Decision I find this Site Allocation a very sad one given the amount of Sensitive Wildlife Sites that will be permanently impacted by these proposals. Had the Site come forward freshly in this plan or in the next couple of years it may have been rejected on Environmental, Biodiversity, and loss of Wildlife with species numbers degradation or elimination. It is also sad to see that Warren Road – a completely unsuitable 4th Entrance/Exit Point onto the Andover Road for occupants of this huge site - is Mandated by this Policy for use by All Vehicles. And this will open up the Gateway for the Norgate operated Donnington New Homes to bid for more Residential Housing on Greenfield Space completing the Urbanisation of the this Area between Newbury and Wash Water/Enborne Row. It puts the concept of wildlife corridors into disrepute as there will no nowhere left to go. Others with more knowledge can argue detail of this Policy but suffice to say I would like this to be finite.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1265
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>There remains considerable doubt as to whether the build-out of the whole site will be achieved before the end of the Plan period. Hence we believe it fails the soundness test by not being effectively deliverable.</p> <p>For a start, Thames Water notified the Council in 2020 that no more than 50 new dwellings can be occupied before a significant upgrade to sewage treatment works and drainage is completed. This presumably involves a developer contribution towards the cost and will also be far-reaching in scope and includes: a new pumping station near the top of the Monks Lane / Newtown Road (A339) hill needed on third party land; upgrades to several sections of foul sewage mainly lying below main roads in Newbury; a new holding tank near - and expansion to - the (Listed) existing Victorian pumping station at Faraday Road, which is in the middle of the Council-owned London Road Industrial Estate (itself due for redevelopment). This alone, quite apart from other infrastructure that needs to be available before works commence, means that the earliest completion of new units is likely to be significantly later than that shown in Appendix 1 to the Nov 2022 Five Year Housing Land Supply: 2025/26. Presumably all of the Bloor Homes Sandleford Park East site (1080 units) will need to feed into this sewage system.</p> <p>At a rate of 100/year (as shown in the Housing Land Supply table) and starting in, say, 2028/29 in theory the Bloor development could be built out within the Plan period. However, the southern section of Bloor's site needs to link with Sandleford Park West (on another developer's land) if it is to rely on the Warren Road access onto A343 and not on a large valley crossing bridge to connect the Community Centre with the main housing north of the valley. Until a detailed Planning Performance Agreement between Bloor and the Council (and ideally also with the other developer, whose outline application has yet to be approved) has been seen, there can be little confidence that the Bloor site will not reach a point where progress is slowed.</p> <p>As for Sandleford Park West, the developer is known to be hoping to avoid using Warren Road and instead to be able to extend the development south towards the Hampshire border and make a new access onto A343 either north or south of the River Enborne. Therefore, we have little confidence that the western part of the allocated site will proceed at pace and be delivered by the end of the Plan period 2039.</p> <p>For this reason we suggest the allocation from Sandleford be reduced to 1200, although the site can remain allocated for 1500, with the remaining 300 completed in the period after 2039.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>At the end of the first sentence in SP16 add "of which only 1200 are to be delivered in the period to 2039".</p> <p>In 6.45 (or in new paragraph), add to the end: "A first Reserved Matters application for the eastern part of the site is expected in late 2023 and the last Reserved Matters need not be submitted for 12 years thereafter (i.e. 2035). Based on this and because there remain significant technical reasons why no completions are likely until about 2028 and why the linkages between the east and west parts could prove problematic, we do not expect it will be possible to build out the whole allocated site by the end of the Plan period."</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Whether or not I remain a Member of the Council, I intend to keep a close interest in progress of the site. I have had a close involvement in it since 2009. A Planning Performance Agreement is due to be published late this year and we would wish to review our comments on Sandleford after that.</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	West Berkshire Green Party
Consultee Full Name	David Marsh
Consultee Organisation	West Berkshire Green Party
Agent Full Name	David Marsh
Agent Organisation	
Comment ID	PS743
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:35:13
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>I do not accept that the area's need has been "objectively assessed". The target for housing is an arbitrary figure based on government guidelines which the government itself has now disowned. The draft plan takes no account of this. West Berkshire has particular issues, notably that a large part of the district falls within an AONB, that make the target in the plan unrealistic without two large developments on greenfield sites that in my view are not consistent with the NPPF and are contradictory to many parts of the draft plan itself.</p> <p>The plan is not an appropriate strategy for the reasons given above.</p> <p>The plan is not deliverable because, as the history of its predecessor demonstrates, developments on the scale of Sandleford Park and Thatcham NE are not deliverable within the plan period.</p> <p>I do not believe that the plan enables the delivery of sustainable development in accordance with the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>SP16</p> <p>Inclusion in the draft plan of further development at Sandleford Park contradicts the very first strategic policy in the plan, SP1 (spatial strategy), which says priority should be given to sites of "lower environmental value", on "previously developed land," and "conserving and enhancing the distinctive character and identity of the natural environment".</p> <p>It is also inconsistent with SP10 (green infrastructure), which seeks to prevent the loss of green spaces and to "extend wildlife corridors and provide habitat connectivity", with DM15 (trees, woodland and hedgerows) and DM16 (ancient woodland).</p> <p>SP 11 (biodiversity and geodiversity) states: "A network of green infrastructure will be provided which will conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland." There are several areas of ancient woodland on this site. The draft plan does not explain what it means by "appropriate buffers" but the council has indicated that it considers 15 metres appropriate, despite the following:</p> <p>"Although the minimum size of a buffer zone should be at least 15 metres, we would expect this to be significantly larger for a development of this nature and size." (Natural England)</p>

“It is considered that a buffer of greater than 15m would be appropriate for the ancient woodland on this site and that a buffer of 30m would be appropriate in areas where the ancient woodland is immediately adjacent to the built development ... If this development were to proceed with the currently proposed 15m buffer zone, it is likely that these ancient woodlands will deteriorate for the reasons stated above and the council will fail to meet its statutory obligations under the Natural Environment and Rural Communities Act (2006) and will fail to meet the policy objectives of both the NPPF and West Berkshire Core Strategy.” (Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust)

The Woodland Trust recommends 50 metres; Kings Lynn & West Norfolk Council agreed a 50-metre buffer for its Reffley Wood) site and Wiltshire County Council's policy is “a 100-metre woodland/parkland buffer between all ancient woodland ... and built development”.

At an absolute minimum, therefore, SP16 should contain clear guidance on what precisely it considers an appropriate buffer for ancient woodland in line with the above comments and policies, and indeed the policies included elsewhere in the draft plan.

SP16 is inconsistent with the NPPF (2018) on biodiversity which it defines as “development that leaves the environment in a measurably better state than beforehand”. It is inconceivable that further Sandleford Park development, on a wildlife-rich greenfield site, can meet this requirement.

It is also inconsistent with SP23, which says that development should “minimise the impact of all forms of travel on the environment” (in accordance with the council's climate emergency and environment strategy). The location of the site in relation to Newbury Town Centre makes it inevitable that many if not most residents would be reliant on cars. One only has to look at comparable developments (for example the Glendale Avenue estate on the opposite side of the A343) to realise that Sandleford Park will maximise, rather than minimise, the impact of transport (and in particular private cars) on the environment because of its location.

However much wishful thinking the council engages in, the fact is that the location of Sandleford guarantees that many if not most people living there will rely on the private car for most journeys.

SP16 further contradicts the draft plan on DM2 (separation of settlements) where the proposed expansion of Sandleford Park southwards, with access via Warren Road, significantly reduces the separation between Newbury and Enborne Row/Wash Water. Developers are already proposing "Sandleford Park South" which would remove this separation entirely and create a single housing development from Monks Lane to the Hampshire border. The plan as drafted can only encourage rather than prevent this process because it clearly identifies Sandleford as the principal area of Newbury for development.

SP16 is also in conflict with DM8 (Air Quality), which says it should not expose occupiers who are particularly sensitive to air pollution, such as those in schools, healthcare establishments or housing for older people. By changing the sustainable transport link via Warren Road to a main access route, vulnerable users will be subjected to additional air pollution. Warren Road is literally a few metres away from Park House School, opposite Falkland School, and close to at least one of the proposed Sandleford development schools.

The Warren Road access road is perhaps the least acceptable and explicable part of SP16. Previously this had been designated for pedestrians, cyclists and public

	<p>transport only. Without explanation, in the new draft plan this has now been redesignated for “primary all-vehicle access”. This is clearly in conflict with SP23 and DM8 and in addition will completely change the character and environment of the entire Wash Common area. It is outrageous that this change has appeared in the draft plan without any explanation or justification.</p> <p>For all these reasons it is the view of West Berkshire Green Party, the minority Green Group of West Berkshire councillors, the official opposition Green Group of Newbury town councillors, and myself as Green Party councillor for Newbury Wash Common ward (West Berkshire Council) and Wash Common ward (Newbury Town Council) – which includes the Sandleford Park site – that SP16 is in conflict with numerous elements of the draft plan, the NPPF, and indeed government policy on housing allocations, and therefore renders the current draft plan unsound.</p> <p>One final point is that although Bloor Homes' application to develop the first phase of Sandleford Park was granted outline planning permission on appeal, for up to 1,000 homes, this has no bearing on the rest of the allocated site. The draft plan includes 1,500 homes, envisaging 500 in addition to the Blair Homes development. However, we would argue that these 500 homes should be removed from the plan for all the reasons stated in this submission, particularly as they would have a far more seriously detrimental effect on the area because of Warren Road access.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	As West Berkshire councillor for the ward that includes Sandleford, I have an in-depth knowledge of the issues affected by SP16 and feel it would be beneficial for the examination if I were able to participate and answer any questions that may arise.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bloor Homes (Represented by White Peak Planning Ltd)
<p>Consultee Full Name</p>	Bloor Homes
<p>Consultee Organisation</p>	Bloor Homes
<p>Agent Full Name</p>	Rob White

Agent Organisation	White Peak Planning Ltd
Comment ID	PS1321
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	White Peak (Bloor Homes) Annex 2.pdf White Peak (Bloor Homes) Sandleford Park.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Object. The policy is not justified or effective. (in relation to Gorse Covert)

The Sandleford Park allocation has been carried forward from the Core Strategy, Policy CR3 Sandleford Park. It was intended to deliver up to 2,000 homes. Site constraints and the importance of delivering a significant level of green infrastructure have reduced its capacity to around 1,500 units.

The draft plan, through policies SP1 Spatial Strategy and SP3 Settlement Hierarchy, continues to place importance on focusing housing development in Newbury, identifying that an urban extension on greenfield land at Sandleford Park will form a new residential neighbourhood. The Sustainability Appraisal/Strategic Environmental Assessment reinforces this approach. It did, however, consider four options for Sandleford Park (Table 28, page 36). It did not consider an additional option to include Land South of Gorse Covert.

Land South of Gorse Covert (plan attached) presents an opportunity to support the plan strategy of focusing new residential development in Newbury and ensure that the optimum number of dwellings is proposed in this sustainable location [Sandleford Park]. Land South of Gorse Covert is available, suitable and deliverable within the plan period. The site has capacity to deliver up to circa 200 housing units. It is adjacent to, and immediately to the south of, the Sandleford Park Strategic Allocation set out in Policy SP16. Consequently, it abounds the land the subject of an outline planning permission for up to 1,000 homes, Land at Sandleford Park (Ref 20/01238/OUTMAJ), the larger of the two Sandleford Park sites. Bloor Homes is the developer for both Land South of Gorse Covert and Land at Sandleford Park.

The site is in a sustainable location for development, being in Newbury and adjacent to an allocated site. There are no site constraints which prevent it from being developed. Land South of Gorse Covert was assessed in the HELAA Update 2023 with reference GRE2. The capacity was incorrectly estimated as 150 units instead of up to circa 200 units. Contrary to information in the HELAA, it is now being promoted by a developer. The site is identified as being bordered by ancient woodland to the north but this is an area of commercial woodland and is not subject to an ancient woodland designation. There is scope to provide access to the site through this wooded area. Woodland to the south as at some distance from the site boundary. Overall, the site appears to have been excluded from further consideration due concerns over landscape character. The accompanying note Annex 2. Land South of Sandleford Park, Newbury (HELAA Site Reference GRE2) Landscape Review sets out an assessment by the developer's landscape architects SLR. This concludes that 'development of the site would not have a detrimental effect on the "settlement form, pattern and character of the landscape."' The review was based on consideration of relevant policy documents and a desktop-based study of the existing landscape pattern within the site and its immediate vicinity.

The review reaches this conclusion (paragraph 6.2) 'due to the site's location within the landscape, and the strong existing boundaries associated with the current and future2 landscape and visual baseline. The setting of, and views from, Grade 2 listed Sandleford Priory would also be preserved. The proposed settlement form and pattern within the site would be aligned with the proposed development pattern within the allocated Sandleford Park8 development north of Gorse Covert. It would respect and strengthen existing boundary elements – reinforce existing hedgerows to the east and west and provide appropriate buffers from the woodland edges to the north and south. This would help to integrate the site and associated development within its landscape context, thereby ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.'

As previously stated, the site is being promoted by the developer for Land at Sandleford Park, which offers maximum potential to integrate the site into the existing allocation. The site would benefit from the new services and infrastructure coming forward as part of Sandleford Park, representing a highly sustainable extension to a long standing commitment in the Local Plan.

As currently proposed, SP13 does not present an appropriate strategy in that it has not fully taken account of all reasonable alternatives i.e an option to increase the size of the Sandleford Park Strategic Allocation. It also fails to include a parcel of land which would contribute towards the delivery of sustainable development, contrary to the intentions of the NPPF (2021).

Para 6.55

Object. The supporting wording is not justified or consistent with national policy guidance. Supporting paragraph 6.55, which specifies that additional policy criteria will be added as the Local Plan Review progresses. Now the plan is at consultation stage, this caveat should be removed. The policy needs to be clear and sound, giving certainty to the developers.

Object. The policy is not justified or consistent with national policy. (in relation to Sandleford Park East)

The Local Plan, in continuing to direct development to Sandleford Park, is consistent with the NPPF by proposing new development in locations that will achieve a sustainable pattern of development. Newbury, as the main settlement in the District is the most sustainable location and Sandleford Park is the most appropriate location for strategic housing delivery in Newbury (paragraph 6.49). Bloor Homes Ltd have secured outline planning permission (20/01238/OUTMAJ) for Land at Sandleford Park, the larger of the two Sandleford Park sites. Subject to submission and grant of planning permission for Reserve Matters, the site is realistically deliverable within the plan period.

There are, however, a number of areas where the policy should be amended to ensure that the plan is sound. Attachments: Annex 2 (Gorse Covert) and Sandleford Park Location Plan.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

<p>4. Proposed Changes</p>	<p>Proposed amendment 1. Land as shown on the Policies Map is allocated for a residential development of approximately 1,500 1,750 dwellings.</p> <p>Proposed amendment 2. Amend Sandleford Park Site Boundary on page 69 of the Local Plan Review, to include Land South of Gorse Covert as shown outlined in red on the attached plan 'Land South of Gorse Covert'.</p> <p>Proposed amendment 3. Supporting paragraph 6.55 should be deleted.</p> <p>6.55 Criteria for the delivery of the site are included in the policy above. As work on the LPR progresses, these will be further developed and refined to include any additional, specific, mitigation measures and infrastructure requirements identified by stakeholders engaging with the process.</p> <p>Now the plan is at an advanced stage of consultation, this caveat should be removed. The policy needs to be clear and sound, giving certainty to the developers.</p> <p>Proposed amendment 4.</p> <p>Delete A Minerals Resources Assessment will be provided for the site.</p> <p>The requirement for a Minerals Resource Assessment is not necessary. Detailed studies have shown that the winning of minerals would adversely impact on this sensitive site with ancient woodland and associated ground water regime. The requirement should be removed from the policy.</p> <p>Proposed amendment 5. Sustainable Transport through routes connecting the A339, Monks Lane and Andover Road for pedestrians, cyclists and public transport subject to agreement with bus operators.</p> <p>Additional wording is required to qualify the requirement for sustainable bus routes, as this is partly controlled by the bus operators. The extent to which Warren Road can be widened is understood to be limited, although the Manual for Streets does recognise that whilst streets on bus routes should not generally be less than 6.0 metres wide, this could be reduced on short sections with good inter-visibility between opposing flows. Therefore, the existing widening scheme can serve as a bus route subject to agreement with bus operators.</p> <p>Proposed amendment 6.</p> <p>Bloor Homes do have significant concerns with the requirement for the provision of: "On-site renewable energy to assist in the delivery of a carbon neutral development;"</p> <p>In its current form, Bloor Homes believe that this aspect of draft Policy SP16 is unsound for the following reasons:</p> <ol style="list-style-type: none"> 1 The current Outline Planning Permission (OPP) does not require the development to be carbon neutral and therefore introducing such a requirement at this stage is unsound because at no point during the preparation or determination (including at the Public inquiry) was the requirement to be carbon neutral considered from a technical and commercial perspective. 2 There are many different definitions of Carbon Neutral (some of which include embodied carbon) which are significant commercial and technical challenges which must be considered at the very outset of the design process. Sandleford is currently proceeding to Reserved Matters applications and therefore undertaking detailed design work. 3 The request for 'on-site' renewable energy is also ambiguous and can refer to large scale renewable energy infrastructure, implementing this type of system would impact on land availability and could also lead to a reduction in housing delivery. 4 The Outline Planning Permission for Sandleford Park East is supported by a number of planning conditions which were agreed with the Secretary of State (SoS). These should therefore form the basis for the sustainability and energy strategy. No additional requirements should be introduced at this stage. <p>To resolve the issues of soundness for Policy SP16, Bloor Homes consider that the most effective way to achieve this is to delete this requirement from Policy SP16 and replace it with the following text:</p> <p>"Development of the site will be expected to deliver:</p> <p>... On-site renewable energy to assist in the delivery of a carbon neutral development;"</p> <p><u>'A sustainability and energy strategy.'</u></p> <p>Infrastructure: The Policy refers to an Infrastructure Delivery Plan, but this is not appended to the consultation document. We reserve the right to make further representations in relation to this in due course.</p> <p>Para 6.55 - Remove</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Yes. To fully explore the merit of including additional land within the Strategic Allocation.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The</p>	<p>Yes</p>

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kiff, David
Consultee Full Name	Mr David Kiff
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1595
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	09/03/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based	

<p>on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*Late Response*</p> <p>Opposition to the development of the Sandford Park site has been ongoing for more than a decade. The various planning application submitted by Bloor Homes for Sandford Park East and Donnington New Homes for Sandford Park West were rejected by West Berkshire Council in October 2020 only to be overturned by the Planning Inspectorate/Government in May 2021, approval being subject to 58 conditions. This approval only appears to apply to the 1000 home development for Sandford Park East submitted by Bloor Homes. As SP16 refers to 1500 homes presumably the additional 500 homes refers to the Sandford Park West development proposed by Donnington New Homes, which was previously rejected by West Berkshire Council. The strategic Development Plan for Sandford Park calls for a single planning application to achieve a comprehensive development for the whole of the Sandford Park Site. The Sandford Park East development on its own does not achieve this objective.</p> <p>The Planning Inspectorate/Government approved in subject to 58 conditions. Given the extreme pressure that will be placed on local services, transport, roads and utilities there is a need to ensure all condition placed on the approval are fully met. A planning requirement should be that the newly constructed Highfield Copse road linking to the A339 is extended from the outset of the development to form a spine road through the site to relieve the pressure of construction traffic using the two Monks Lane access and Warren Road.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Pincents Lane (Represented by TOWN)
Consultee Full Name	Pincents Lane
Consultee Organisation	Pincents Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1359
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincents Lane) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The strategic site at Sandford Park was first allocated more than a decade ago in the adopted Core Strategy 2012, but progress has been slow ever since.</p> <p>Following a lengthy planning process involving significant delays, the first phase of Sandford Park (1,000 units) was granted permission on appeal by the Secretary of State only in May 2022. The appellants were Bloor Homes (a volume housebuilder) and the Sandford Farm Partnership.</p> <p>Of the 58 planning conditions on the Sandford permission, 36 require pre-commencement submission and approval of details. As of February 2023, the West Berkshire planning portal has not registered a single discharge of conditions application. The sole submission being a s.96A non-material amendment, requesting a change to shorten the period for submission of all reserved matters to a maximum of 12 years.</p> <p>The 2022 WBC AMR gives (at Table 3.6) a figure of 100 homes to be delivered by 2026 in the current five-year housing land supply. This would require two outlets (ie developers) operating at optimum output for a period of two years (circa 0.8 units per week), plus affordable housing delivery (footnote 4 - Lichfields blog October 2018 'Driving Housing Delivery from Large Sites').</p> <p>Instead, it would be common practice to allow some 12-18 months for discharge of all conditions with a further 18-24 months of on-site enabling works prior to first construction.</p> <p>In summary, given the following:</p> <ul style="list-style-type: none"> • The infrastructure requirements of any large urban extension; • The number of pre-commencement conditions to be discharged; • The requirement for reserved matters applications to be prepared and submitted; • The absence of any other volume housebuilders appointed to date; • The fragility of the housing market generally <p>it is considered that delivery of 100 units by 2026 is highly unlikely. Again, the evidence from the previous studies quoted is that large strategic sites have a longer time to open up and generally deliver low numbers of units in the early years, building to a higher rate of delivery subject to local market conditions including competition. Commencement of first homes in the 2025-6 financial year seems potentially achievable, but the figure of 100 homes delivered by 2026 seems hopelessly optimistic.</p> <p>Beyond 2026, Sandford Park is proposed for completion within the timescale of the Local Plan Review, ie to 2039. This would require market units to be completed at the rate of 65pa plus the full 40% proportion of affordable housing in order to be built out within this timescale. This is highly unlikely from only one outlet and still subject to the vagaries of the housing market cycle were two developers to be delivering from the site.(footnote 5)</p> <p>It would therefore not be sound to rely on the delivery of 1500 homes in the plan period rather that figure should be reduced by at least around 250 units so that the rest will fall to be delivered beyond 2039</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>It would therefore not be sound to rely on the delivery of 1500 homes in the plan period rather that figure should be reduced by at least around 250 units so that the rest will fall to be delivered beyond 2039</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Berkshire Oxfordshire Bucks Integrated Care Board
Consultee Full Name	BOB Integrated Care Board
Consultee Organisation	BOB Integrated Care Board
Agent Full Name	Helen Clark
Agent Organisation	
Comment ID	PS1136
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 17:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<ul style="list-style-type: none"> The ICB notes that regarding Sandleford (SP16) consisting of 1,500 proposed housing units, that on page 55 of the Supplementary Planning Document for this site, it states that "Health care facilities to serve the site, likely to be through the extension of Falkland Surgery" but no details are given. It is further understood that there may be a Section 106 Agreement in existence for this Sandleford housing site which provides for £512,625 for health mitigation in the form of an extension at Falkland Surgery/68.35 % of the cost of such an extension (WBC email to Helen Clark of 10 February 2023 refers). As the assumption from this is that such an extension would then in total only cost £750,000 (including VAT, fees and finance), the ICB wishes it to be known that the extension that Falkland Surgery now to mitigate such a large housing development is estimated to cost around £1.25 M including VAT, and that consequently, if at all possible, the Local Plan Review and the amount of developer contributions required by the ICB for this 1,500 housing unit proposed development at Sandleford should be increased to reflect these more accurate cost estimated. A failure to reflect up to date cost estimates (given that we understand the £750k estimate dates back to 2014) will mean that the proposed extension will become unaffordable to the NHS.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Macro, Alan
<p>Consultee Full Name</p>	Councillor Alan Macro
<p>Consultee Organisation</p>	

Agent Full Name	
Agent Organisation	
Comment ID	PS1425
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	Warren Road is not suitable for general vehicular access
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	The policy should be re-worded so that Warren Road reverts to access for public transport and cycles as originally proposed.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1191
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	<p>We note and support the proposed criterion: "Development to be limited to the north and west of the site in order to respect the landscape sensitivity of the wider site and to protect the registered historic landscape and setting of the former Sandford Priory;"</p> <p>We welcome reference to "Respect the landscape significance of the site on the A339 approach road into Newbury"</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1814
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	Turley (Hathor Property) Table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	No

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Delivery of Proposed residential site allocations</p> <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been 'carried over' from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Following an initial review of this progress, the table below lists those sites where there has been no progress or where progress has stalled are listed in the table below <i>[for table in full, see attachment 'Turley (Hathor Properties) Table']</i>, along with a review of their current planning status.</p> <p>Retained allocation from Core Strategy: Sandeford Park, Newbury (Policy SP16) This is a site allocation being carried forward from the current adopted Core Strategy for approximately 1,500 dwellings (current policy CS3).</p> <p>Planning status: Sandeford Park, Newbury (Policy SP16) This is a site allocation being carried forward from the current adopted Core Strategy for approximately 1,500 dwellings (current policy CS3).</p> <p>The remainder of the allocation is under different land ownership and has not yet come forward under a new planning application.</p> <p>1,580 homes have been counted for in the Council's housing supply position at 31st March 2022. It is unclear from the Council's Annual Monitoring Report 2022 and Five Year Housing Land Supply 2022 statements how many dwellings arising from the Sandeford allocation are anticipated to be delivered within the 5 year period.</p> <p>The AMR does acknowledge <i>"the timing of delivery is likely to be largely in the period post 2026"</i>.</p> <p>Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period.</p> <p>The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes

5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1557
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>This allocation for a residential development comprising approximately 1,500 Dwellings presented in this plan has not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of the site as required by national policy. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on this site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>The below should be addressed and included in Policy SP16 - Sandlesford Strategic Site Allocation as requirements and opportunities.</p> <p>Requirements</p> <p>There should be no penetration of the London Clay strata. No discharge into groundwater and information should be provided to demonstrate this. Please refer to the Environment Agency's Approach to Groundwater Protection guidance Environment Agency's Approach to Groundwater Protection guidance for all types of development proposals. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf]</p> <p>There is no mention of the Enborne on the south boundary of the site or the provision of a buffer zone of a minimum of 10 metres to prevent run-off which we requested previously. This needs to be included as the Enborne is a main river.</p> <p>We would not support any additional flows to Newbury STW (as is the case for some other allocations). Newbury STW is currently at around 98% of its dry weather flow - DWF capacity, and the development planned to drain to the STW would certainly take it over capacity. A new DWF permit would be required that ensured no deterioration of any quality elements. Newbury STW is to get a 0.1mg/l phosphorus permit limit during AMP 8. This is to meet the CSMG requirements of getting the River Kennet SSSI to good status. Before any development connecting to Newbury STW proceeds, we would need to have confidence that the additional phosphorus load would not undermine the AMP 8 objectives. 0.1mg/l is a 'stretch target' and TW would need to have confidence they would be able to meet that target with any additional loading. The Environment Act will compel water companies to reduce their phosphorous loading from STWs by 80% from a 2020 baseline. Permit limits lower than 0.25mg/l do not count towards that target so higher loads to a STW with a permit limit lower than 0.25mg/l may undermine a water companies' ability to meet the Environment Act objectives. Newbury is a high spiller, and additional developments and flows will increase frequency of spilling. Therefore, we would not support any additional flows entering - the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. As stated in our notes on Policy DM7, adequate water supply and wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development proposed prior to the occupation.</p>

	<p>Opportunities</p> <p>There may be opportunities to enhance the river corridor which would contribute to biodiversity net gain. There is also various local wildlife sites and ancient woodlands which would need to be protected and a buffer of 15m between these and any Local Wildlife Site and Atomic Weapons Establishments</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>We wish to attend the examination for an opportunity to explain the need for this site allocation to include</p> <ul style="list-style-type: none"> • environmental constraints • site requirements to enable development and • opportunities to ensure the sustainable delivery
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1645
Chapter / Policy / Appendix Number	Policy SP 16
Chapter / Policy / Appendix Title	Sandleford Strategic Site Allocation
Order	57
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
Please give reasons for your answer	<p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states: “(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p>

	<p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”</p> <p>The SA/SEA Environmental Report states:</p> <p>“The Core Strategy had a focus on Newbury and Thatcham, with two strategic sites allocated in Newbury and smaller sites allocated across the rest of the district. This mix of strategic and smaller sites across the district worked well for the Core Strategy by providing flexibility and natural phasing of developments across the plan period. As a result a similar mix of sites is considered to be appropriate for the LPR with no other alternatives considered.”</p> <p>Regulation 12 requires the identification, description and evaluation of ‘reasonable alternatives’. If an approach worked well in the current plan period, it does not follow that it is the best approach for the following plan period – and it is certainly does not follow that there are no ‘reasonable alternatives’.</p> <p>It is incorrect for the SA/SEA to assert that the approach in the current Local Plan has ‘worked well’ by providing ‘natural phasing of developments across the plan period. This is certainly not the case for the Sandleford Strategic Site Allocation. Policy CS3 of the current Local Plan states:</p> <p>“Within the area identified at Sandleford Park, a sustainable and high quality mixed use development will be delivered in accordance with the following parameters:</p> <p>Phased delivery of up to 2,000 dwellings, of which at least 40% will be affordable and with an emphasis on family housing. At least half the housing is planned to be delivered by 2026;”</p> <p>However, as the SA/SEA explains (pages 35-37): “no work has started at the site at Sandleford, with outline planning permission for the eastern part of the site only granted (on appeal) in May 2022.” The site has been re-allocated “as a single site for up to 1500 dwellings”. “Reducing the number of dwellings on the site allowed for better consideration of the constraints on the site (Ancient woodland, drainage, landscape buffers etc.) and will allow for adequate and appropriate mitigation measures to be put in place.”</p> <p>The SA/SEA states (page 25, below the table):</p> <p>“Following the decision that the spatial strategy should focus on Thatcham, strategic site options were considered, based on the sites submitted through the February 2020 HELAA.”</p> <p>Therefore, ‘reasonable alternatives’ that are not around Thatcham were not considered. This decision was also based on the false premise that the town of Thatcham would have sufficient infrastructure to support this development, either at the time of the decision or as a result of the development. The lack of infrastructure in Thatcham is addressed by other representations of the Town Council.</p> <p>The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policy SP1 cannot be legally compliant, because it explicitly states that it has not complied with the requirement to identify, describe and evaluate reasonable alternatives to the proposed policy. The experience of delays in delivery of Sandleford Park in the current plan period (described in paragraphs 6.44 – 6.46 of the draft Local Plan, and the reduction in the number of dwellings from 2,000 to 1,500, suggest that the proposed policy for North East Thatcham is not even the best alternative.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by</p>	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>As explain in Section 1 above, the draft Local Plan explicitly states that no alternatives have been considered. The evidence of the failure of the Sandeiford Strategic Site Allocation to deliver the expected number of houses suggests that relying on two strategic sites (with a number of smaller sites) is not even the best approach.</p> <p>As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>A new Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) needs to be undertaken, which considers all 'reasonable alternatives' to the decisions relating to strategic sites and proposed approach of Policy SP1.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>Thattham Town Council is the principal representative body of the community of Thattham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy SP 17 North East Thatcham Strategic Site Allocation

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mildenhall, Simon
Consultee Full Name	Simon Mildenhall
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS26
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/01/2023 15:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	I see that west Berkshire council are still not listening to the people that live in the area where you are planning to build Thatcham on green belt land, this will heavy impact on the residents that already live in this area. There are too many too many cars traveling in Thatcham at peak times. You will be creating more flooding in an area that is already prone you have already built in Thatcham there has been no new infrastructure with wait times for a Doctor's appointment is are coming from other surgery's to fill in. The schools catchment areas are getting bigger and bigger and with a shor devastating for children that are already being taught in the local schools with bigger classes.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Parascandolo, Sarah
Consultee Full Name	Sarah Parascandolo
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS14
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter	E-Mail

* Other * SMS * Web * Unknown	
Response Date	21/01/2023 18:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing in opposition of the planned development in North East Thatcham. As a resident of Upper Bucklebury and Chapel Row, I foresee a safety risk in the volume of traffic that would be generated on the new lane. Already traffic is heavier in this area. With the proposed extra houses would come commuters seeking a route to the bus stop via the footpaths or lampposts. When children are walking to their school buses that park opposite the Bladebonr, I can see a child being injured by a rushing commuter in a car.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	With other brownfield sites available to develop , I don't think greensite is the option the council should support.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beenham Parish Council
Consultee Full Name	Ms Jennie Currie
Consultee Organisation	Beenham Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS13
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	06/02/2023 22:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	Yes

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Local Plan Review – comments from Beenham PC</p> <p>SP17 - North- East Thatcham Strategic Site</p> <ul style="list-style-type: none"> • No objection in principle • Ensure infrastructure is in place before housing • Flood risk study for neighbouring sites. • Assess increase in road traffic on road through Upper Bucklebury (which will lead to increased traffic through B) measures to stop traffic using this route.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

<p>publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hills, Roger
Consultee Full Name	Roger Hills
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS28
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	27/01/2023 16:40:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	No
Please give reasons for your answer	<p>We are very concerned about the lack of attention to AONB issues as well as the reluctance to discuss the development of Brownfield sites in the area. Many of us in Bucklebury can attest to the existing problems with off-roading, littering, and noise, which will only worsen as the number of vehicles increases. In short, Bucklebury has an ecosystem of natural beauty which we understand no environmental research has yet taken place notwithstanding there is a statutory requirement to do so.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? -</p>	No

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>As an overview we think the Plan has been badly thought through and should be delayed until the various local interest groups, including the Parish Council and Bucklebury says No, are satisfied it is in the interests of all, which is not remotely the case at the present time. The proposal to build 1250, 1500 or 2500 additional homes is understandably causing considerable concern among residents and especially, Bucklebury. The NPPF consultation process has not yet been completed and we suggest WBC should take a pause, to pause the planning process and to bring forward an updated plan when the details become known in 2023.</p> <p>We are very concerned about the lack of attention to AONB issues as well as the reluctance to discuss the development of Brownfield sites in the area. Many of us in Bucklebury can attest to the existing problems with off-roading, littering, and noise, a Common which will only worsen as the number of vehicles increases. In short, Bucklebury has an ecosystem of natural beauty.</p> <p>We understand no environmental research has yet taken place notwithstanding there is a statutory requirement to do so.</p> <p>We further understand there has been no traffic modelling to take account of the significant increase in vehicles resulting from the proposed development. This is evidenced by the comments in the latest issue of the Newbury Weekly News from Mr Brian Lyttle, the WBC Planning Officer, that there is no provision for any increased parking at Thatcham Station and, moreover, there is no provision in the Infrastructure Delivery Plan 4 of the Sustainability Appraisal - to promote and maximise opportunities for all forms of safe and sustainable transport.</p> <p>There is no significant increase in parking at Thatcham Station. Moreover, it has come to light that there is a proposal to create a new road, which is not a sensible proposal. The road is steep, narrow and winding, is without pavement and is already dangerous. This proposal will not have a positive impact on road safety and would reduce opportunities for walking and cycling. We understand the proposal is on HHR which would add yet more traffic and may well result in an increase in anti social behaviour which is already a problem in the area. In short, there does not appear to be a credible infrastructure plan or a willingness to discuss these issues, publicly.</p> <p>No clear and important infrastructure plans appear to have been taken about schools and medical services in the area.</p> <p>There are many other issues which concern us and we may follow up this e.mail nearer to the time the Public Consultation takes place. We would like to see evidence based responses to these issues bearing in mind the Local Plan is meant to take us through to 2038.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Green, Tom
Consultee Full Name	Tom Green
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS36
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	12/02/2023 11:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Firstly, the plans are unsound and will have a negative impact on my family, neighbours and me personally.</p> <p>I believe that this development will devastate the peoples lives already living in the area. The infrastructure cannot cope</p> <p>The impact to local wildlife will be incredibly negative affecting this renown area of outstanding natural beauty. We can't take that away from us with the inevitable light pollution.</p> <p>I can't understand why developers are not forced to build consciously. I appreciate there is a need for housing but not in a small town.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cooper, Kev
Consultee Full Name	Kev Cooper
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS57
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	13/02/2023 16:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would like to express my official objections to the proposed NE Thatcham housing development between Thatcham and Reading. In reviewing the plans, I have several reasons for my objections, which I will outline below.</p> <p>1. TRANSPORTATION. Traffic volume and road safety: I reside <address redacted> in Burdens Heath by the <address redacted> pathways on Burdens Heath and in maintaining the hedge and the verge side around the property already poses a significant risk to my and other residents' safety still further. The proposal will significantly increase the risk to my and other residents' safety still further. The current volume of traffic to the speed limit will undoubtedly increase with the higher volumes of traffic that will be seen because of the development of a straight road that is already a magnet for young drivers who park up before flooring their accelerators to test the speed limit stretch. Alongside this, regular drivers persistently fail to slow down when entering the village. The proposed development will be substantially because of cars circumnavigating the A4 travelling through Cold Ash, Upper Bucklebury, Chapple Row and the already congested traffic on the A4 travelling through Thatcham and onward towards Reading and the M4. The development is very dangerous to maintain the frontage of my property and safely walk into the village. Harts Hill is a narrow and winding road.</p>

	<p>Heath is very narrow in places, both of which cannot accommodate the increase in the volume of traffic, nor the increase in the number of vehicles safely.</p> <p>2. LOCAL HEALTHCARE SERVICES: There are insufficient Healthcare Services under the NHS to meet current demand. Getting a dental appointment is currently very difficult, due to the shortage of GP's in the area and I fear the extra strain from the increase in traffic will have a detrimental impact on the services used by the existing residents. From a dental perspective, regular check-ups at a dental practice are cancelled by the NHS Practice as they regularly lose and fail to replace existing dentists. These cancelled appointments are difficult to rearrange, and it is a consistent pattern driven by the volume of patients and the ability to attract dental staff. I recall a dental appointment cancelled and they will not rebook as they don't have visibility on when they will be able to get a replacement dentist.</p> <p>3. ENVIRONMENTAL FACTORS: The area surrounding my property comprises ancient woodlands and heaths which are of high ecological and bio-diversity. The rear of my property sees many deer feeding up to my fence approaching from the area where the deer roam on their natural habitat. The deer roam freely and regularly cross Burdens Heath, Harts Hill Road, the village of Upper Bucklebury Common and The Avenue. The increase in traffic will undoubtedly shrink the area of their roaming habitat whilst also increasing the number of vehicle accidents because of their crossings will undoubtedly rise, both significantly reducing their population and the road users and would pose serious harm to road users in general.</p> <p>I moved to Upper Bucklebury expressly to get away from the towns and cities that have been my home in the past and my view of the area and outlook. I look out onto ancient woodland <redacted> and am located <address redacted> the edge of the North Downs which is a natural barrier/buffer behind my property, which currently acts as a barrier between the urbanisation of Thatcham and the village of Upper Bucklebury. The Natural Beauty, for the proposed development, will undoubtedly both affect the landscape and biodiversity of the region. The presence of Fox, Badger, and birds of prey will be adversely affected. In addition, we see the Great Crested Newt which is a protected Government wildlife and habitat conservation (hyperlink: https://www.gov.uk/guidance/great-crested-newts-protection) and the proposed development is likely to destroy the habitat of this protected species and would require a licence from Natural England to be protected. I am unaware if this has been granted.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bateman, Penny and Lee
<p>Consultee Full Name</p>	Penny and Lee Bateman
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS38

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	01/02/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Having read the proposals of your 325 residential homes to be built almost opposite our estate, we ask these questions Where are the thousands of people who live in them going to find doctors? Trying to see a doctor since covid is almost impossible building (how many?) places for the elderly, where will they access doctors, nurses and have their obvious extra needs met in this area when they require urgent help, but not urgent enough for an ambulance? Where are people going to find chemists? In Thatcham, town centre there are NO chemists left. The only one nearby is the Medical Centre and is so tiny, that stock is reduced to practically nothing and the queues outside on a daily basis are

	<p>Where are they going to find a bank? None left in Thatcham now.</p> <p>As we have no school-age children we don't know if any have places for all the new incomers, but do they? Have you?</p> <p>New homes are not viable without the infrastructure for everyday living and we don't see any of that on your plans.</p> <p>Country parks, woodland, play areas and wildflower meadows are all very well but people need doctors, banks, chemists etc.</p> <p>And these things should be in place before one single house is built.</p> <p>It was only recently in 2019 that Bloor Homes built their Thatcham Place estate on Tull Way. There are 75 houses there. How many more will they build? How many more market town like Thatcham?</p> <p>Yet plans are still in place for a new development at the top of Floral Way, containing an enormous 2,500 homes. More than 2,500 homes. How many thousands of people will settle there? If that gets planning permission granted why will we need your homes? How many thousands of people will go for essential services?</p> <p>Just because land is available, doesn't mean you have to fill it!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Ferrier, Sally
<p>Consultee Full Name</p>	Sally Ferrier
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS43
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p>	E-Mail

* Web * Unknown	
Response Date	22/01/2023 18:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I'm responding to the proposed Local Plan review consultation for 2022-39.</p> <p>My name is <name redacted>, I live at <address redacted>.</p> <p>My main concern is the Theale area.</p> <p>"- 40 houses built on Whitehart Meadow - the area of land between the Woodfield Way estate and the M4. - 60 houses built on the site of the old sewage works, off Blossom Lane - 1,500 houses built on the Theale side of Thatcham."</p> <p>At least 50% of each of these if they are approved MUST be social housing. This is the biggest need in our increasing and maybe 5% affordable homes shouldn't just be flats either! Just because people can't afford to stay in their village garden or basic things many people take for granted. It's a village, they are green and plentiful, NO PLACE for flats. My and gives everyone outside space and a garage and is an ideal fit for the village if inspiration is needed.</p> <p>My next concerns is the doctors surgery and schools that are very over subscribed as it is. We would need them ma the area.</p> <p>Theale already has a bad smell of sewage outside the new Red Lion Flat development on the Englefield road/church s court/Elizabeth court already have sewage issues so Theale's entire village will need its sewage waste pipes upgrad</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Off the back of this we have already got several hundred houses coming to the village maybe they need to be the "G they have been built a new review for Theale can take place to see if they can even cope with those?
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pugh, Moyra
Consultee Full Name	Moyra Pugh
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS51
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	31/01/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The plan has not been easily accessible - eg not in village halls, very difficult to understand and complete for people literate. Local councils and local groups have had limited opportunities to reply and respond to the plan.

	Destruction of wildlife and habitat - lack of consideration eg ground nesting burds such as the night jars
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Encouragement of brown site development - there are still many sites in Newbury which need development and would be better served by the old police station,</p> <p>Protection of the countryside and greenbelt areas</p> <p>Protection of rare species eg ground nesting birds eg bringing cats nearer to their breeding sites</p> <p>Travel- encouraging green travel.</p> <p>Residents would all have to use a car - would be better nearer the centre of Newbury where there is better travel infrastructure</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>There seems to have been limited consultation with local groups.</p> <p>There have been no maps or proposals shown on the local village halls.</p> <p>Not easily accessible to people who are not computer literate</p> <p>Not easily understandable format</p>
<p>4. Proposed Changes</p>	<p>More widely advertised and accessible</p> <p>Reducing the proposals to nearer the centre of Newbury where transport is more easily accessible and there is less impact on green spaces and wild species habitats</p> <p>Further consultation response submitted: 31.01.23 via email:</p> <p>I am very concerned about the proposed North Thatcham to Upper Bucklebury housing development for the following reasons:</p>

	<p>1. the loss of such a beautiful area which is full of wildlife - hares, birds etc</p> <p>2. bringing cats nearer to rare ground nesting birds and species</p> <p>3.the impact on traffic - the road to Bucklebury is already like a busy race track to Reading</p> <p>4. the loss of green space between Newbury and Upper Bucklebury and the urban spread.</p> <p>I would like to have these objections raised</p> <p>There appear to be many brown sites in Newbury which could be developed to make Newbury itself more appealing eg the old police station site.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
5. Independent Examination	The effect will be widespread on the local community and effect everyone who lives locally
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brooke, Jane
Consultee Full Name	Jane Brooke
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS55
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	13/02/2023 16:12:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan</p>	

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to put forward an objection to the proposed building works between Thatcham and Upper Bucklebury, I feel this would have a devastating effect on the local area for the following reasons</p> <ol style="list-style-type: none"> 1. Traffic increases through upper Bucklebury would have a detrimental effect on the health and safety of its residents and have a negative impact on the environment 2. The increased pressure on the primary and secondary schools cannot be sustained, the local schools are already at capacity 3. I am particularly concerned about the impact of the increased use of Bucklebury common, this will impact the wildlife and the common has been unchanged for hundreds of years, the increased use of the common will ruin the natural quiet tracks and footpaths and the common in a way which cannot be reversed. The ANOB will be gone forever. I also feel the light pollution will effect the night sky in the few areas where the stars can be enjoyed. The increase in noise will also have a huge impact on Bucklebury residents 4. I am also very concerned about how the local doctors surgeries and the dentists are going to cope with the increased numbers and cannot cope with any increase in numbers, as a recently retired nurse I know this will be a major problem. 5. From your proposal Upper Bucklebury will become part of Thatcham and we will loose our village, I feel Berkshire is a special place and to loose any of these is a tragedy.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cox, Andrew
Consultee Full Name	Andrew Cox
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS37
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	12/02/2023 22:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	No

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Please could you record this as an objection to the revised Local Plan (which is fundamentally unsound) In respect of the NE Thatcham proposal for 2,500 homes, this has a number of flaws:-</p> <ol style="list-style-type: none"> 1 Huge amount of additional traffic on roads that are already highly congested. 2 Pressure on schools 3 This is a strategic gap between Thatcham and Bucklebury
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Guy, Lili</p>

Consultee Full Name	Lili Guy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS66
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 19:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>I am writing to you to object the plans for up to 2,500 properties to be built in NE Thatcham.</p> <p>I live on <address redacted> and regularly use the green area to walk my dog.</p> <p>The traffic on floral way is already very heavy and the traffic through town builds up very quickly. Sometimes it can take me 10 minutes to get to my road onto the main road.</p> <p>It has also taken me 3 weeks to get a doctors appointment. With the increased numbers of people I am very concerned about the impact on our doctors.</p> <p>I think thatcham is a lovely small town and the increased number of people will heavily change the area.</p> <p>I am also concerned about the environment, there has already been a lot of houses build by Vodafone and another property on the main road, a hotel, which may I add you have already build access before the plans have been approved, is this aloud?</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darling, S.C.
Consultee Full Name	Mrs S.C. Darling
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS70
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other	Letter

* SMS * Web * Unknown	
Response Date	16/02/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I write to object most strongly to the councils proposals to build between 1500-2500 houses in Thatcham.</p> <p>There are many areas which make the building of any houses completely wrong.</p> <p>Firstly, the roads are not able to cope with the traffic we now have, let alone any more cars. For every additional house we have more cars and then more pollution than we have already.</p> <p>The schools are full to overflowing. This is both primary and secondary. We have no bus service so children get bought and should be walking.</p> <p>Our GP surgery are overstretched and already have more patients than they can cope with. They want to do a good job but we all need but they cannot do this because of patient numbers.</p> <p>We live in an area of outstanding Natural Beauty which must be protected at all cost. Nothing is more important than protecting our countryside and people. Wildlife is disappearing at an alarming rate and people are suffering from all kinds of health issues that they would not have had space around us to live our lives.</p> <p>I shall not live to see the appalling destruction of our beautiful countryside if the Housing Development goes ahead, but I shall be there after me and who will have to live with the consequences of your actions.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Colman, Nigel
Consultee Full Name	Nigel Colman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS74
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	18/02/2023 14:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Destroying an AONB cannot be legal!

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The plan is completely unsound. It is not positively prepared, justified, effective and nor is it consistent with national policy. It would not be a sustainable development for WBC nor the Thatcham area.</p> <p>The grounds for impact and benefit assessment lack any credibility whatsoever and are simply not evidence-based. No alternatives have been explored and there is no evidence to show that this is an appropriate strategy for WBC.</p> <p>There is no evidence that such a ridiculously large development is deliverable within the timescale.</p> <p>This development would destroy the landscape in an AONB.</p> <p>The increased traffic, lack of access, junctions, car parks and insufficient safe and sustainable transport would increase the impact on the area.</p> <p>There is completely inadequate education and healthcare provision already and this development would exacerbate the situation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	There is insufficient evidence that local residents views have been taken into account.
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cobb, Jane
Consultee Full Name	Jane Cobb
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS88
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	17/02/2023 19:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Please accept this e-mail as our objection towards the proposed development in Thatcham NE based on the following:</p> <p>Significant increase in population - what provisions are being made for a Doctors surgery, Dentists and hospital space at full capacity, with some services reducing i.e pharmacies closing down.</p> <p>Significant increase of traffic - we already have a struggling road network around the whole area, take Thatcham Tra example. The 'rat runs' the surrounding villages will be subject to will most certainly increase danger to life as they are very few passing places and blind bends. Harts Hill does not lend itself safely to more traffic with the added danger of The junctions of Burdens Heath onto Broad Lane and short section of road by the SAAB garage to join Harts Hill Road extremely hazardous to pull out of with the extra vehicle numbers. Likewise the 'pinch points' along Broad Lane in Upper more 'near miss' incidents as drivers will be waiting much longer for their turn to proceed</p> <p>Services - we have had a number of issues with our water supply and leaks over the years. Whilst there has been work still experience a number of leaks. Can all the services, be it water, waste, electricity etc cope with such an increase to help alleviate flooding, where will all the rainfall run off to now as it wont have the fields to help absorb it? a fact that become a more common problem with our changing weather patterns.</p> <p>Whilst we appreciate affordable housing is in short supply, does this area really deserve to be disfigured by a development when open green space is being hailed as a 'healer' and everyone is being encouraged to go out and benefit from it, why it, let alone the untold damage we are doing to our wildlife. There are alternative plots of land available for development sites, why can't these be looked into before all the irreversible damage is done to our green fields?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>There are alternative plots of land available for development, some of which are brownfield sites, why can't these be looked into before all the irreversible damage is done to our green fields?</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Frankum, Roger
Consultee Full Name	Roger Frankum
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS65
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	09/02/2023 12:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We live in Upper Bucklebury and are appalled by the proposal to build 1500 houses as an enormous of Thatcham, through the village. You will know of the increased strain on Thatcham, already overloaded and with little recent infrastructure. Kennet School already take any more pupils. Broad Lane, Upper Bucklebury, already often has too much traffic and another lot of about 1500 houses would be a disaster for the system.</p> <p>However I particularly want to draw your attention to the impact on Bucklebury Common. The Common is an important heath in Southern England. A number of unusual birds breed there; there are nightjars, stonechats, woodlarks and skylarks and trouble and indeed money have been spent to preserve the heath as heathland, in particular by control of the encroaching trees. All nest on or near the ground and the nests are likely to fail if disturbed by dogs... If 1500 houses are built there would be a lot of dogs and many of them would be exercised on the Common. This would alter the ecosystem substantially and we would lose the heath. For these reasons and many others I hope you will reject the proposal for 1500 houses in NE Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>de Vere Gould, Graeme A.</p>
<p>Consultee Full Name</p>	<p>Graeme A. De Vere Gould</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS69</p>

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	15/02/2023 15:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to formally object to the proposed Thatcham North East Housing Development as I believe that the approved plan is not in the public interest. Environmental The land that it is being considered for development is currently on a green field site and is prime agricultural land. As a result, the land is not able to become more self-sufficient in our foodstuff production and less reliant on imported goods. Furthermore, the land is a valuable resource (as a result of its location in the Common) and such a large development would have a huge detrimental effect on such a fragile and diverse eco-system. Therefore, the Council should give more consideration has been given to the negative impact on this valuable resource.

Much of this land also lies in the Kennet river valley which at present floods regularly down stream – a situation which is a serious situation for the neighbouring communities.

I do not believe that WBC has given serious consideration to brown field sites that are currently available for development.

Healthcare

As I understand it, only vague references have been made towards the provision of infrastructure to support such a development of medical services, etc.

On the subject of healthcare, a 450 sq/m primary healthcare facility with the suggestion that a GP surgery be offered to the Integrated Care Board but the document contains no details into strategic healthcare planning. A development of this scale is not a fit for purpose Health Impact Assessment (HIA) according to current guidelines from Public Health England. The plan is overstretched so obviously there would be serious negative impact on both existing and new residents. The only realistic HIA is that the inevitable conclusion would be an acceptably high negative impact on existing and new communities and such a development should not be permitted. Again, the proposals for this development are fundamentally unsound as any required documentation has been deliberately ignored. None of the local GP practices have been consulted and none would be prepared to take the full range of branch surgery on economic/practical grounds.

The same argument applies to the provision of dental services in the Thatcham area.

Education

WBC as an Education Authority has a duty to make arrangements for suitable school provision. How this obligation is met is not defined or evidenced in the LPR. It is therefore clear that the plan for secondary school provision is unsound for the following reasons:

- 1 There is no satisfactory evidence of the number of pupils the school is to cater for.
- 2 The location of the school is not clear.
- 3 The number of Form Entries is not defined but it is noted that anything less than a 6FE school is unsustainable.
- 4 The timing of the funding is not clear.
- 5 There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Transport

There would be serious traffic management issues with the major trunk route of the A4 (single carriageway and currently used for the majority of the traffic). The plan includes an exit from the development onto Harts Hill Road, a single track road through the village of Upper Bucklebury. With the inevitable congestion caused along the A4, this will lead to much of the traffic seeking alternative routes through the unlit villages eastwards through Upper Bucklebury, Chapel Row and Bradfield Southend. Potentially, much of the traffic will be heading towards the Bradfield College area. Any traffic heading in a westerly direction would inevitably make its way through Cold Ash towards the M4 junction 13, passing by the schools of St Finian's Catholic Primary School and Downe House School. The scant consideration given to these issues seems unsound and unsafe to the point of being dangerous. Furthermore, WBC claim that modelling suggests that such measures will not cause problems. However, they not produced any modelling results to this effect. For some reason WBC have not considered the Harts Hill junction. This again would seem to be unsound as scant thought appears to have been applied.

Timing of the LPR Consultation

At the outset, one of the reasons given for this development was to fulfil WBC's obligation to meet certain Government targets. The use of this particular area was that there was nowhere else suitable due to the high percentage of AONB and nuclear facilities in the area. Burghfield. At the time, it was acknowledged that the siting was far from ideal. Since the latest announcements from the Government for Levelling Up, Housing and Communities) a Written Ministerial Statement was released setting out forthcoming amendments to the National Planning Policy Framework (NPPF).

The Statement set out the following (inter alia):

I will retain a method for calculating local housing need figures, but consult on changes. I do believe that the plan-makers should start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory. It should be used, working with their communities, to determine how many homes can actually be built, taking into account what should be protected, that our precious Green Belt or national parks, the character of an area, or heritage assets. It will also be up to them to ensure affordable housing if they wish.

My changes will instruct the Planning Inspectorate that they should no longer override sensible local decision making where there are local constraints and concerns. Overall this amounts to a rebalancing of the relationship between local councils and the Secretary of State to give local communities a greater say in what is built in their neighbourhood.

Obviously none of this has been taken into consideration. Local communities have been totally ignored. The precious AONB will be severely impacted. The fact that the site was not ideal at the outset and the mandatory requirement to develop it down, it is unsound to go ahead and develop on an unsatisfactory site.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Allison, Pat
Consultee Full Name	Pat Allison
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS73
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	16/02/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>I wish to object to the proposed Thatcham NE Development as some of the plan's components appear to be unsound.</p> <p>My reasons for this are:</p> <ul style="list-style-type: none"> • Loss of a substantial sized piece of prime precious "green belt" land which currently clearly separates Thatcham from the building of houses, which will have a devastating affect and impact on the local wildlife, environment and ecosystem. • During the building phase of this development there will be significant disruption from noise and heavy goods vehicles on the site on Harts Hill; the A4 and other local roads, as well as large noisy construction vehicle movements within the development time span. • Once the development is completed there will be a huge rise in vehicle movements on the A4, Flora Way, Hartley Row, Bradfield Southend, Thatcham, Cold Ash as most home occupants have one or more vehicles. • There are no clear provisions in the plans for additional health centres, dental practices, or schools in the locality of the development. The local current services and schools are already heavily pressured/stretched and will not be able to cope with the increase from the development. • The negative impact that this Development has for me is that it's creation will take away from myself and other's beautiful views where the Development is going to be sited. Collateral damage would occur in and on the nearby Bucklebury woodlands and protected species, from the extra foot fall from the inhabitants from the Development visiting the area. • The proposed development will increase my driving journey time along the A4 towards Newbury from the East of Thatcham. Extra vehicles that will be exiting and entering the Development. These extra vehicles will be creating additional environmental impacts.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>West Berkshire Council Planners should look at all the closed public houses, derelict, unused dwellings and commercial premises in the area and consider building new homes on these brown belt sites rather than taking PRIME PRECIOUS GREEN BELT land for this new development.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hastings, Christopher
Consultee Full Name	Christopher Hastings
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS60
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/01/2023 19:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The Thatcham area is already over subscribed with housing versus the appropriate services such as medical, police council provided services, etc. Then there is the environment, the destruction of huge areas of green field and wood habitats, some maybe endangered species cannot be overlooked or swept aside. Another aspect of increased population system would also be totally inadequate. Say NO the this development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, Sarah
Consultee Full Name	Sarah Jones
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS64
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 20:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Building 1500-2500 Houses is simply not suitable for the size of Thatcham and the current infrastructure we have. The additional cars, would make even the shortest of journeys, much longer. Where are the jobs for the adults employed at these homes? I appreciate that some jobs are WFH, but not all. Where are the school places for the children going to live at these homes? The schools just don't have the space for additional pupils. Where are the additional doctor appointments for the new residents? How many of doctors appointments. I have personally experienced calling Thatcham Medical Practice to make an appointment and they had one doctor's appointment available that day, for the whole day, for the whole of the area they cover. Are you proposing a capacity for an additional (at a minimum) 3000 residents?
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	I do not believe that this proposal has taken into account the environmental impact and the infrastructure impact this
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes * No	
Please give reasons for your answer	
4. Proposed Changes	I believe there needs to be a huge change to the number of houses built, this needs to be reduced massively. I also think a lot of work will be needed and a doctor's surgery, as there simply isn't the capacity with the current provisions we have.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Allum, Penny
Consultee Full Name	Penny Allum
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS68
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	12/02/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to express my strong objection to the proposed North East Thatcham development. This is on the grounds that the provision of secondary education, in particular in secondary education, is inadequate to cope with such a large concentrated increase in housing, and also the impact it would have on the adjacent Area of Outstanding Natural Beauty.</p> <p>The infrastructure in Thatcham cannot support the increase in population this development would cause, I am going to raise this as a separate objection. Similarly the case for medical support, transport, etc. The provision for education from Early Years through to Secondary Education is also inadequate within the Local Plan Review (LPR). The fact that there is no coherent end-to-end plan breaches the Council's obligations under the Act for children. As the parent of a child at Kennet School, I have seen the overcrowding that has already occurred since the school opened in 2019, it would further deteriorate education provision to increase numbers, meaning that any additional pupils would be unable to attend. Where schools are oversubscribed those children who live nearer to the school are given precedence, this means that those from Thatcham development would be able to opt for Kennet and those from Bucklebury would have to travel further distances.</p> <p>Furthermore, the LPR plans to address the number increase with an additional secondary school in Thatcham are in my view contradictory. The latest LPR proposes that a sum of £15 million be contributed by the developers to Secondary Education. However, the location of the land to be provided and hence no possibility of assessing its suitability. The Thatcham NE development was assessed by David Locke Associates and Stantec on behalf of WBC, proposes funding for a 6-8FE (Form Entry) secondary school. Government guidelines are that Secondary Schools with less than a 6FE are not sustainable. However, the NE Thatcham development (which proposed 2,500 houses), is not sufficient to fill a 6-8 FE school. With an allocation of 1500 houses in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on WBC's 2023 LPR of date 11 year old study. The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school) is allocated for development. How long would it be until the actual school is built and how would it be paid for?</p> <p>My second area of objection is in relation to the location's proximity to an AONB. Recently a bid to build 26 homes in the area was dismissed. Basingstoke and Deane Borough Council turned down the proposed development in October 2022 by development company JPP Land. The council refused the development on the grounds that they would have a significant impact on the North Wessex Downs Area of Outstanding Natural Beauty. This opinion was shared by the Planning Inspectorate, who issued a decision in January 2023. In the decision it stated "The appeal scheme would suburbanise an important green gap which makes the rural setting of Highclere and in doing so would cause irreversible harm to the intrinsic rural character and appearance of the area...Furthermore, it would fail to conserve and enhance the landscape and scenic beauty of the North Wessex Downs AONB. It is of the importance of considering AONB when making planning decisions; if Basingstoke and Deane Borough Council had approved this with 26 houses, why can't West Berkshire Council recognise the impact of 1500 that would boarder onto the same area?"</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sadler, Richard F
Consultee Full Name	Richard F Sadler
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS100
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	18/02/2023 13:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Although I appreciate the difficulty you face in West Berkshire Council in trying to find suitable space to accommodate housing targets, I hope the recent announcement that mandatory targets are to be scrapped, will mean the N.E.T.D into account comments made on 7th December by the Prime Minister in "the house" namely "Developments should protect the character of local communities", that there will be a "crackdown on Land Banking" being invested in Brown Field Site developments"</p> <p>All of which now appear to have a bearing on this proposed development and will mean along with many other key areas disregarded, the whole plan can and should, be reconsidered along with areas that appear not to have been given due weight.</p> <p>A] an improvement to road and access infrastructure to handle the inevitable increase in road use along the A4 and through Cold Ash, Upper Bucklebury, Midgham, Brimpton, Woolhampton and of course not least Thatcham and the provision of the railway, canal and river Kennet.</p> <p>B] I see no mention for extra secondary school capacity for the Kennet school or anywhere else. The Kennett already has will extra places be achieved?</p> <p>C] With the development being proposed on a green field site adjoining an AONB I see nothing positive or related to a development on biodiversity or damage etc to the ecosystem both in the general AONB and in particular Bucklebury development will definitely not "protect the character of our local community" therefore should be seen as going against and the current government's view.</p> <p>D] I believe there has been a development proposed to you [WBC] covering an area containing a portion of land on the south side of Thatcham know as Colthorp. This development also proposes a rail bridge. It seems to me, that such a development to help answer some of the infrastructure issues previously mentioned.</p> <p>Equally some years ago a proposal was rejected for a smaller development covering an area known as Seigecroft Farm. It was re-visited and pulled together with the previously mentioned, Colthorp / South Thatcham opportunity a much more harmonious could be achieved.</p> <p>I could continue endlessly with negative observations regarding the proposal and in particular its scale and the negative impact on the local environment the wild life and general ecosystems that flourish in such an area and the adjoining AONB.</p> <p>But considering the apparent NEW attitude in rural development reflected in the Prime Ministers announcement I would like to check and absorb the latest information and hopefully be in a better position to develop a more practical and acceptable</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	White, Deborah
Consultee Full Name	Deborah White
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS104
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	18/02/2023 20:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I object to this proposal as I find it unsound for the reasons detailed herein.</p> <p>3.1.1 TRANSPORT</p> <p>I live in Upper Bucklebury - a very unique and delightful small RURAL community that would be hugely negatively impacted (and pollution) from the proposed plan for an exit at the north of the site onto Harts Hill Road (and only became apparent in my Report July 2021). WBC predicts 'some DISPLACEMENT of A4 traffic onto wider RURAL routes such as Upper Bucklebury Road.</p> <p>This would cause our lovely RURAL (WBC) to be split in two (You just need to look at Winnersh RG41 to see what that would be like there) with an unwelcome and dangerous continual surge in traffic along Broad Lane. The result would be danger to access the primary school where already roads are inadequate, without pavement (or with very narrow pavements) for elderly residents who need to access the only village store (SPAR/Peaches Stores) who are already in peril due to the development of Floral Way. This is neither sound nor safe.</p> <p>The road surfaces are already poor (with frequent and multiple Thames Water leaks requiring repair) with traffic passing over them there is simply not the infrastructure to allow for any additional traffic along this beautiful and rural route.</p> <p><u>I ALSO DRAW YOUR ATTENTION TO THE COUNCIL'S REFUSAL FOR AN ACCESS ROAD CONNECTING FIVE MILE CROSSING AND ST GABRIELS FARM at Cold Ash (near Thatcham) THAT HAS BEEN REFUSED BECAUSE IT WOULD HAVE AN 'ADVERSE IMPACT.'</u> This argument applies in this case too and I object to the proposed plan and demand that equity to be applied to Upper Bucklebury.</p> <p>3.1.2 Access and junctions</p> <p>There is No modelling plan shown in the documents for the proposed junction at Harts Hill despite WBC having assumed it would be sound</p>

3.1.3 Car Parks

A proposed new CAR PARK on Harts Hill would encourage even MORE traffic to this dangerous road (I refer you to that stretch of the road in the recent cold spell - despite the council gritting the road it remained impassable for several days). How is this car park? How is anti social behaviour and night time 'racing' of cars through the common road going to be quelled? meeting site?

3.1.4 Safe and Sustainable Transport

How do the council possibly conclude that the policy is likely to have a Positive impact on road safety and travel, when the impact on Upper Bucklebury **WOULD BE THE OPPOSITE as cited above.**

3.2 Healthcare

The NE Thatcham Development plan proposes a Primary Healthcare facility (to be offered to BOB ICS however there is no provision in accordance with latest NHSE guidance. I am passionate about this having dedicated my entire working life to the proposed facilities never get delivered (I cite Jennets Park, Bracknell RG12 as just one example of hundreds in recent years that was reneged).

FEW NEW GP PRACTICES ARE COMMISSIONED BY NHSE (I should know as I work in one in BOB ICS) not least in Upper Bucklebury. It is not available to be employed in them.

GP numbers in England down every year since 2015 (The Guardian 11/04/22),..... and **132,139 NHS POSTS lie vacant**. Even if the proposed facilities were to be commissioned and built there would simply be no staff to run it.

These are FACTS and again prove the unsound judgements being banded about in even considering such a huge (and substantially reduced) development. **THERE WILL BE NO HEALTHCARE PROVISION FOR THE RESIDENTS OF THE LOCALITY**. Nor are there **ANY dentists** in the locality (or further afield) taking on NHS patients. There are not currently the facilities to meet the demand for populous, let alone the addition of another 1,000 to 2,500 houses with all that entails. Completely unsound.

The impact of such a huge development on the local air quality should be assessed and investigated.

More traffic including stationary traffic be that on the A4 or Floral Way or Broad Lane will bring increased pollution and noise. This along with the proposed number of houses releasing energy into the local environment will inevitably cause a decline in the local population. This is completely unacceptable when 'spreading' the housing numbers required over a far more extensive area by having fewer small developments would STOP this from happening. This is unsound and its impact would be lifelong.

3.3 Environmental Impact

Upper Bucklebury consists of ancient woodlands, heaths and an historic and beautiful common (Bucklebury Plateau) with habitat for important vegetation and animal life.

Placing a major green field development in the broader landscape setting of the North Wessex Downs AONB would cause a significant impact on wildlife known to be present on this site.

THERE IS NO EVIDENCE TO SUPPORT CLAIMS THAT SP17 WILL HAVE A POSITIVE IMPACT ON THE ENVIRONMENT. IT IS EVIDENT THAT IT WOULD HAVE A SIGNIFICANTLY NEGATIVE IMPACT. Of note the strategy documents required for the development (if they exist) have not been made public for the regulation 19 consultation. Rendering this proposal unsound.

The updated SP17 text makes note of two 'community parks' that were initially put forward as 'country parks'. This demonstrates a lack of commitment to protecting the natural environment and peoples' enjoyment thereof.

As SP17 does not provide proven plans for providing adequate green space within the development nor demonstrate a commitment to protect and delicate biodiversity, there will inevitably be spill over of people visiting the common areas locally and causing a decline in the local population. This is in polar opposition to the management vision for Bucklebury Common which is explicitly focused on NOT increasing the number of ecosystems that they work hard to restore and nurture. **The LPRs sustainability Appraisal accepts that SP17 will have a significant impact on environmental sustainability. This would be irreparable thus is unsound and unacceptable.**

3.4 Education

There is no clear plan showing provision for education from nursery through to secondary education which renders the conceived housing plan untenable.

The proposed development would have significant impact on secondary school provision for children in Upper Bucklebury. There is only one school catchment (near Compton) with no provision of a paid for school bus which would prove prohibitive for many. This has not been considered in the plan.

There is no evidence of the number of pupils a proposed new secondary school would have to cater for.

The location of the school is not clear

There is no clear plan of the funding nor that such funding is sufficient to meet the councils obligations to provide education.

None of this is clearly defined nor evidenced in the LPR thus making it unsound.

IN ADDITION

The water and sewerage systems in this locality are often overwhelmed with Thames Water frequently having to attend to the system. This is even more worryingly currently having to pump effluent into the local river nearby. Additional housing (and certainly the associated traffic) in such circumstances is simply not tenable.

	<p>The Secretary of State for Levelling up, Housing and Communities issued a statement on 6th December concerning the Local Plan Review process. The statement states that the Local Plan Review process is NOT mandatory and that THE PLANNING INSPECTORATE SHOULD NO LONGER OVERRIDE SENSIBLE LOCAL PLANNING DECISIONS WHICH IS SENSITIVE TO AND REFLECTS LOCAL CONSTRAINTS AND CONCERNS.</p> <p>I urge WBC to do as other local councils have and PAUSE the planning process in order to bring forward a revised plan with the updated planning guidance.</p> <p>To not do so would be folly.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lloyd, Susan
Consultee Full Name	Susan Lloyd
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS108
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail

Response Date	20/02/2023 15:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I should like to register my strongest objection to the proposed North East Thatcham development as put forward plan to be unsound because:</p> <ol style="list-style-type: none"> 1. Building so many houses on greenfield sites goes against Government guidelines of 'supporting brownfield sites' 2. The WBC modelling for traffic shows exits from the site onto the A4, which is already badly congested several times a day, apparently onto Harts Hill Road but no drawings for this proposed exit exist - suspicious <p>Because Harts Hill road is already too dangerous for cyclists and pedestrians, it is steep with sharp blind bends. A proposed exit onto Hill would equal double trouble. Therefore the Council's assessment of a Positive Impact of Road Safety and Safe Travel of the site is surely questionable.</p> <ol style="list-style-type: none"> 3. Combined with the obvious substantial increase in the use by cars, vans, lorries of the roads through nearby villages, the lack of lighting, equalling dangerous rather than 'safe travel'. Especially in relation to the Primary School in Upper Bucklebury, this would impact every single person be they cyclist, dog walker, horse rider or resident. 4. No Health Impact Assessment for this development has been published, and we understand this should have been done, which may leave the scheme without any Healthcare. 5. There does not seem to be any funding earmarked for a new GP Surgery. Few new practices are being commissioned nationwide. Therefore a new GP Surgery and its' associated health practices are not a realistic prospect. This is another example needed for a development of this size is problematical. 6. Combined with the building, or not, of new schools

	<p>7. Combined with water run-off from this quantity of houses, especially if they are to be built up hills, which will adversely affect the village.</p> <p>8. A development of this size, 1500 or 2500 houses, will effectively join the village of Upper Bucklebury to the top of the hills with no approach by WBC to the residents of this area despite the Council's member for housing Hilary Cole stating that with 'the local community'. This has not happened.</p> <p>9. The damage to the environment and in particular Bucklebury Common which would occur cannot be overstated. We are working to <u>reduce</u> footfall in order to protect the rare habitats and species therein, not increase it, and the LPR's own evidence states that there will be a negative impact on environmental issues particular to the Common, and the whole area of the Common.</p> <p>10. The scheme ignores the fact that in Bucklebury Vision and Bucklebury Plan a definite and substantial green belt around Bucklebury was agreed to and approved by WBC.</p> <p>This proposed development the size of a town the size of Hungerford represents a massive over-development of green space and adjacent AONB.</p> <p>I believe the proposed development known as North East Thatcham to be inherently unsound.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Garnett, Gary
<p>Consultee Full Name</p>	Gary Garnett
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS86
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	05/02/2023 08:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing in opposition of the planned development in Northeast Thattham.</p> <p>As a resident of Chapel Row, I am extremely concerned about the increase in the volume of traffic that would be generated on Hatch Lane, with commuters seeking ways to the A4 and onwards.</p> <p>The traffic is already heavy in this area.</p> <p>The traffic is generating a situation where children are walking to their school buses, with no street paths or streetlights, and many children carrying their torches. Combining this with an increase of commuters rushing to work in their cars. Is a very clear accident waiting to happen in a child being seriously injured or killed.</p> <p>The proposed extra houses would see more commuters seeking a route to the A4 via Hatch Lane, and thus increasing the risk of accidents happening.</p>

	For this reason, I don't think the council should support this development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Barney, Alaric
Consultee Full Name	Alaric Barney
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS102
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	18/02/2023 13:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>In summary, I find the plan unsound.</p> <p>Traffic Problems: Without the council stating the potential locations of any additional primary healthcare and dental secondary schools, it is impossible for them to evidence the likely flow of additional traffic from this development in any and improvements to the existing road infrastructure assessed as necessary to accommodate it before this development.</p> <p>I live in <address redacted>, Midgham, which <address redacted> via Cox's Lane or Church Hill. Both roads are barely the former is single track for most of its length, and the latter single track at certain points with passing places. These roads are heavily congested on the A4.</p> <p>These roads are already experiencing more traffic from new builds along the A4 and more locals new to the area either in cars, on their bikes and walking dogs. <Address redacted>, it's more efficient for me fuel-wise (& to avoid risk – turning round) to use Coxs Lane when travelling to Thatcham and Newbury but it's becoming increasingly dangerous to do so as more cars are using single track lanes. It's almost impossible to make any journey now along Coxs Lane without encountering two or three cars having to reverse back to one of the few limited passing places. This makes every journey take longer, raises the risk of accidents and increases the risk of driver confrontation as drivers unfamiliar with these roads don't know the passing places, and I can point out that the nearest passing point is much closer to them than for you!</p> <p>These roads are heavily used by cyclists, horse riders, people and dog walkers accessing public byways and footpaths along these roads. It is unconscionable for any increase in traffic along Coxs Lane, Birds Lane or Church Hill without an unacceptable risk of injury to me, other humans and animals. I'd like to see modelling that shows there will be no increase in traffic along these roads impacting on their current use for recreation, leisure and sustainable commuting by bike by the local community.</p> <p>The load of traffic on the A4 is already too heavy, particularly between 7am – 9am and 4.30pm – 6pm. As commuters and residents of Woolhampton which is a bottle neck, and when locals use the pedestrian crossing to cross the road, and we are regularly stuck at Pips Way and Theale roundabouts. This idling traffic pumps out exhaust fumes making it hazardous for me as a driver, residents, pedestrians trying to walk to the Midgham train station or along the footpaths along the Bath Road. The council's plan to increase traffic on these roads is a disaster.</p>

longer than it used to due to the increase in traffic over the past 6 years since I've moved to the area. More traffic using these roads increases travel time and further pollute the local area with emissions. When I try to exit either Coxs Lane, or Church Hill to turn onto the Bath Road I have to wait for up to 5 minutes and sometimes longer to find a safe gap in the traffic. And the risk of a collision is high. The stream of drivers using the Bath Road to travel between M4, Newbury and beyond. The speed limit has been reduced to 30mph for various reasons. But unexpected congestion and drivers speeding up make up time makes traffic speed irregular & unpredictable. This is very dangerous for anyone pulling out against the grain of traffic! This road simply can't safely accommodate any increase in traffic.

Broad Lane, The Common and The Avenue are already being used as rat runs for people as an alternative to using the Bath Road. This is unsafe driving along these roads as impatient drivers overtake at speed during rush hour. These roads are also regularly used with our dogs, horses and bikes. We criss cross these roads to find different tracks through the common for walks. In the future (and potentially?) will bleed from this NE Development onto these roads making it unsafe for us to use for recreation and pollution. The wooded environment with fuel emissions. This AONB is so revered that it regularly attracts people from outside of the area. The flow of traffic in the middle of this rare and beautiful place will make it less friendly and safe for everyone wanting to use it.

When travelling to Thatcham, I use Hart Hill and Floral Way. Harts Hill has several dangerous blind bends and a steep descent which is dangerous in icy conditions. Floral Way is heavily congested during rush hour traffic. May I see the traffic modelling for any junctions in particular any safety assessment done on the risk to other road users of having junctions on these roads? I can't see how to encourage safe and sustainable commuting: riding a bike down Harts Hills will be even more perilous?

How will this development have a positive impact on walking, cycling and public transport?

I note the proposal for a car park on Harts Hill. For what purpose?

I'd like to see the council's traffic modelling at the various bottle necks in the area during peak traffic to see what the impact will be on time (all modes), safety & emissions from this development?

Environment: There are adders where the proposed development is. We know this because our dog ran off on a walk near Manor. We found him eventually on private land where the development is intended to be sited. He disturbed an adder which prevented him being bitten (he was poised to bite it as it reared up at him).

Our friend, a reptile expert, was unwilling to visit the location because this is private land and we didn't want to be forced to tell the owner to know what we'd found. In her experience, landowners of development sites have been known to make the location a secret. We have kept this a secret. We will reveal the location for an independent assessment to take place once we are sure before that happens.

I note the plan makes reference to providing green space and playing fields for the new households, but again no details. If schools will open their playing fields to the general public is not feasible due to H&S, safeguarding, maintenance issues. If these are not provided, new households will gravitate to other green spaces in the area, increasing traffic in areas around the flora and fauna. There are already a high number of deer, badger and kites struck by traffic on the roads around the area. I fear this will increase with more traffic flowing through our local roads.

I am also a mushroom hunter. Many mushrooms in the Common and surrounding woods only grow in undisturbed soil. The Common is trafficked by locals and daytime visitors. Last autumn we noticed a near total absence of mushrooms during October. In other woods in the Chilterns and New Forest, they were plenty. It might be because the Common is now a favorite for everything, or because the woods are so heavily used for recreation since covid, that the soil is too widely disturbed? In these woods, the soil will be even more disturbed and the fungi won't have enough time for their hyphae to develop and become devoid of mushrooms & other edibles.

We need a thorough impact assessment to be done on the impact the NE Development plan will have on local flora and fauna.

I and other walkers will also lose access to the popular footpaths from Coxs Lane leading to Colthrop and Upper Bucklebury. Will we be able to access these areas safely on foot with our animals without these footpaths? This development will limit my access to the countryside I currently enjoy and will impair my ability to enjoy it as a local citizen. I'd like to better understand how the council will support the local community for what it will lose in footpath access to areas we currently enjoy?

Flood defence & pollution of river Kennet: Can the council also show local residents how the recent flood alleviation works on a vast paved area (the housing estate & associated roads), and evidence how the consequential run off of water will affect the river further.

Primary & dental care: I am registered at Chapel Row surgery. The medical facility is stretched to capacity with long waiting times. The dispensary regularly operates reduced hours due to demand and recruitment problems. The hours of opening are limited. I struggle to find appointments I can make as a fulltime working person. If more households try to access this facility, the waiting times for professionals are able to give to the current local population. I fear getting a face-to-face appointment will become impossible for my wellbeing at risk.

I am also registered with a dental practice in Tilehurst, some 13 miles away!

As a local resident, I'd like to understand what plans have been created for additional primary and dental care to meet the needs of new households? Not a generic statement that the needs will be met, but something more substantive showing where the council is considering the feasibility of resourcing them and so on. For example, if local facilities struggle to resource their practices, how will the council support new practices?

House price devaluation/ other options: Many home owners here have paid a premium to live on the doorstep of a beautiful area with scenic views & quiet, less congested roads and access to open countryside. What consideration has the council given to changing the area and the impact this will have on the value of our properties?

	<p>There are thousands of individual building plots sites which could spread the load of this proposed housing development for new housing development within the country without degrading the rural landscape.</p> <p>The council must surely have access to a register of potential individual building plot sites within the county that it redevelopments in greenbelt areas as part of its due diligence?</p> <p>Will the council share this due diligence work and all rejected planning applications for new builds for the past 5 years the imperative to use this greenbelt land as opposed to developing other options?</p> <p>This should form part of the consultation documentation.</p> <p>Consultation:</p> <p>I have <redacted> and I have found accessing documentation for this proposed plan very difficult. I am unwell with <redacted> offices to view documents in person and the documents are difficult for me to read online. I also struggle putting anything my objections to this proposed plan.</p> <p>As such I find this entire "consultation" to have been discriminatory. I'd like the council to evidence that fact that they possible to get local residents like us informed, engaged and able to contribute before this plan goes any further. I think residents who've gone over and beyond to explain things to us in a way we can understand as best they can. Something done, but has not.</p> <p>May I also ask why the exit onto Hart Road at the proposed North of the site was only revealed to the local community late disclosure is disingenuous. This fact, and the impact this will have displacing traffic through Cold Ash, Bucklebury would have encouraged more local residents to get involved.... had they known.</p> <p>I believe the council has paid lip service to policies it must comply with, and to an extent, outsourced its responsibilities vested and commercial interest in this proposed development - to the detriment of the local community.</p> <p>This fact, the inaccessibility of the planning documents and the late disclosure of key facts makes this application un</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Jerome, Matt
<p>Consultee Full Name</p>	Matt

	Jerome
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS106
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 13:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

* No	
Please give reasons for your answer	<p>I am contacting you to formally register my objection to the proposed development of between 1,500 & 2,500 houses & surrounding area as I find it unsound.</p> <p>My objection is based upon the following reasons:</p> <ul style="list-style-type: none"> • Infrastructure can not handle the current number of vehicles on the road around Floral Way & the A4 Bath Road • The local schools cannot take more pupils, both Francis Baily & Kennet are struggling & are maximised in numbers already across intakes in the case of Francis Baily. Kennet school is already a huge secondary school & had a 7s. • The area proposed for development is one in which we regularly walk as a family, benefitting both physical & mental health. The remaining green areas locally already for wildlife to flourish & benefit our climate from. • The drainage would be a concern given historic flooding in Thatcham, requiring yet further investment. • Thatcham town centre requires investment to encourage footfall like Newbury has had. • There are not enough amenities already, such as places at Doctors surgeries. <p>I think it would be far more beneficial to look at brown field sites elsewhere, should West Berkshire not meet its housing needs. I thought councils now had more control over housing numbers, following recent legislative changes by national government.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Read, Paula
Consultee Full Name	Paula Read
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS87
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	16/02/2023 13:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would like to object most strongly to the Thatcham NE Development which I find to be unsound on the following grounds:</p> <p>Medical provision and support for residents : Medical services across this region are already under strain and stretched to capacity by a growing population, most particularly in GP Surgeries and Dental Practises. It is of enormous concern to me that neither WEA nor the NHS have arranged or published a prospective HIA specific to the proposed North-East Thatcham development and therefore there is no meaningful engagement between the North-East Thatcham Development Consortium and local general practices.</p> <p>From what I can read we should be realistic that there is no genuine prospect of a new GP practice being established in the foreseeable future and therefore any residents of the new development would be funnelled into existing provision which will struggle to cope with this influx.</p> <p>Education: As a local Early Years Manager I am very aware of the pressures which local educational settings and schools are already experiencing. A new development on this scale cannot be permitted to proceed without a clear plan for providing for the educational needs of the new residents.</p>

	<p>years through to Sixth Form. This is a legal obligation; all children are entitled to receive an education and they should receive this education in schools away from home wherever spaces can be found. From reading documents published that there is any clear understanding of demographics for potential new populations and current/future demands on</p> <p>Transport and road safety : Increased traffic at unacceptable levels through villages and rural areas is an inevitable from a development on this scale. The roads in these areas are inadequate, already damaged with potholes, without the potential for serious accidents for daily drivers, pedestrians, cyclists and also those enjoying the rural areas with riding, rambling and family outings.</p> <p>The purpose of a new car park on Harts Hill is somewhat confusing as this will merely direct more traffic to what is already the year and specifically in cold/wintery weather as local residents have experienced in recent weeks) and may also behaviour in the car parks of which I am all too aware as a resident of Bucklebury Common.</p> <p>Rural Environment : A residential development on this scale would have a disastrous impact on our local environment of our ancient woodlands and heaths (I am a resident of the Bucklebury Common area and as such I am very aware and also the local wildlife which we should be protecting and conserving. I have not been made aware of any documents would evidence any positive outcomes for the environs should this development proceed and indeed as the plans have "a country park" has already been downgraded to "community park" which highlight a worrying lack of commitment to impact.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mackinnon, Lauren
Consultee Full Name	Lauren Mackinnon
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS91
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	18/02/2023 10:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am objecting to the proposed housing developement in the North East of thatcham.</p> <p>I belive the proposed increase in housing would have a a negative impact on the community as it would limit access to n for positive mental health amd would impact quality of life.</p> <p>Health could also be effected due to increased traffic fumes.</p> <p>The plans would have a negative impact on an area of outstanding natural beauty which has a range of biodiversity would be a great loss of ecosystems should the development go ahead.</p> <p>It would also mean building on a green fieldsite where there are plenty of brownfield siteseg in Newbury,West Street</p> <p>I feel the plan is vague previously stating 2 country parks now a Community park. This is a big difference. We do not ne and footpaths as is.</p> <p>I am concerned that the proposed housing would impact on flooding in the thatcham area. The increased traffic would and the villages. Traffic congestion is already a significant issue in thatcham.</p> <p>There is also great difficultly accessing doctors and dentist appointments thatcham does not have the infrastructure f</p>

	<p>There needs to be a proper consultation with GPS and thatcham development consoritum on this. There is a lack of a robust plan regarding the impact on education and SEA I believe the developement could be moved to brown field sites or other locations such as Theale and Newbury</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>I believe the developement could be moved to brown field sites or other locations such as Theale and Newbury</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>McEwen, Lesley</p>
<p>Consultee Full Name</p>	<p>Lesley McEwen</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS95</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 17</p>
<p>Chapter / Policy / Appendix Title</p>	<p>North East Thatcham Strategic Site Allocation</p>
<p>Order</p>	<p>60</p>
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	<p>E-Mail</p>
<p>Response Date</p>	<p>18/02/2023 14:54:00</p>
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to register my objections to the scheme to develop the NE Thatcham site. Firstly, may I mention that several areas of the plan seem unsound and unsubstantiated. The development would have a hugely detrimental effect on the local area for many reasons.</p> <p>1. Traffic and pollution 1,500 homes probably equals at least 3000 new vehicles, each doing at least 2 journeys a day, more if living in Beenham, a small village with narrow, winding roads, many with no footways, any increase in traffic will have a detrimental effect and endanger the many pedestrians, cyclists and horse-riders who live here. Whenever there is an increase in traffic, there are increased amounts of people driving through the village, most of whom do not appreciate the danger.</p> <p>The A4 is regularly at a stand-still at rush hour and drivers heading east may well think it quicker to go to the junction at Southend Bradfield to the A340. That junction is often backed up to Parkers Corner and satnav suggests it is often quicker to go to the junction at Southend Bradfield to the A340. We really do not need more traffic on our narrow roads.</p> <p>Even if all the new residents "only" use the main road it would cause major problems for Beenham residents heading to the A4. This junction has been flagged up to WBC several times because it is dangerous and poorly lit. It needs to be done to improve it. The white lines in the centre of the junction do not allow for traffic coming from the south. It often takes many minutes to negotiate even when there isn't a huge amount of traffic, because of the narrowness of the road on to the crossing point. Are the proposed "new priority" road junctions on Floral Way and Harts Hill going to be better than the junction as the A4 turn at Beenham?</p> <p>Where are all these new residents going to shop? Are more car parks going to be built in Thatcham to accommodate them? If Reading is the destination, how will the A4 cope with all the extra traffic, and where will they park?</p>

The lack of a coherent Plan on Schools Provision across the various proposed developments also means we cannot estimate the subsequent impact on traffic. The siting of a secondary school to the NE of Thattham would increase in traffic across the whole Thattham area.

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Plan, the allocation of North East Thattham against key Sustainability Objectives. Objective 4 is – To promote sustainable transport for all forms of safe and sustainable transport. The SEA makes the following assessments: 'To Reduce Accidents' Council Assessment - The policy is likely to have a Positive Impact on road safety as safe travel will be encouraged on the site. This is not the case for residents of nearby villages.

The policy also mentions sustainable transport links and cycling. However it should be noted that WBC has not been successful on providing good cycle pathways. Cycling along the A4 between Newbury and Theale is definitely not safe. There are no designated cycle lanes often only running for a few dozen metres, stopping, and starting again further down the road. This is of flooding or fallen trees which are not cleared for months.

If new residents are encouraged to travel by train, where should they park? There is very little car parking available.

2. Infrastructure

At the most recent Parish Council meeting, 6th February 2023, our district councillor was unable to answer questions on infrastructure on the proposed site, despite being himself the lead on education, which was rather worrying.

3. Healthcare

Our local surgeries are already at full capacity, with staff regularly suffering stress-related problems due to the time and diminishing funding and support. The major central pharmacy in Thattham was recently closed, making it impossible to get a dentist's appointment on the NHS in Thattham. Knowing all this, why has nothing been done? Why have developers to arrange a relevant Health Impact Assessment or provide evidence of having appropriate health care agencies or providers? They have not made provision to mitigate the burden that 1,500 or more new residents on a local NHS struggling to cope. The aim of WBC and the North-East Thattham Development Consortium to provide a health service component of community infrastructure has not been met as they have not provided evidence of a viable primary care medical facility.

4. Education

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clear in the Local Plan Review (LPR). As there is no coherent end-to-end plan this therefore breaches the Council's obligation to provide facilities for children. Without this provision, the Plan for a large new housing development is untenable.

There are no details in the LPR of the provision for Nursery or Early Years education. The provision for secondary education is unclear and contradictory. There is no data or evidence on the planned numbers of schools or Form Entry places.

The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs School as they are in the catchment area for both. Where schools are oversubscribed those children from the proposed NE Thattham development would be given precedence. This means that children from the proposed NE Thattham development would not be able to attend those from Bucklebury would then be limited to The Downs. The LPR is inconsistent, incomplete and does not provide for secondary schooling in and around Thattham.

West Berkshire Council is an education authority and as such it has a duty to make arrangements for secondary education. This obligation will be met across all school years is not defined or evidenced in the LPR.

5. Playing Fields Provision

Sports fields and playgrounds should be provided. However, these require flat ground. The only flat area on the site is that which is closest to the A4 and therefore in an area with the most traffic fumes. Also, there are no existing facilities. WBC should not assume schools, if they materialize, would open their grounds to the public. Safeguarding and other concerns such as litter and animal waste which the school would be obliged to manage. Safely use the fields. The objective of WBC and the North-East Thattham Development Consortium to provide playing fields has not been met as they have not provided evidence for funding or for a suitable location.

6. Environment

There is bound to be collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area and its heaths, in particular the Common. The management vision for Bucklebury Common is explicitly focused on reducing pressure on the fragile ecosystems they are working to restore and nurture. Siting a major greenfield development in the landscape setting of the North Wessex Downs AONB will forever impair enjoyment of the open countryside and cause detrimental impacts to legally protected wildlife known to be present on the site.

This whole plan is full of serious potential problems which have not been addressed. West Berkshire Council should be drawing board and evaluate the long-term effects on the rural environment which is the bulk of their residents. The interests of their current constituents, particularly those of us who choose to live in quiet, rural areas. Perhaps they should consider the issue of the 500 or so homes which are permanently empty in the district, and look at brown field sites which are ruining part of the AONB which is such an important and precious resource.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Collier, David
Consultee Full Name	Derek Collier
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS103
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 18:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	There is no reason to build so many houses in this area. Thatcham Colthrop and Midgham are not big enough for the why should we be a resting place for people who will be working in Reading and London who without knowing it spo
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Cooper, Julie
Consultee Full Name	Julie Cooper
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS59
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 08:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to register my formal objections to the proposed NE Thatcham housing development located between T. My objections are based on my review of the plans and the following concerns.</p> <p>1. TRANSPORTATION. Traffic volume and road safety: I reside <address redacted> in Burdens Heath by the <address redacted> footpaths and the challenges of maintaining the hedge and verge near my property already pose a significant risk to my property. This risk will only increase this risk for myself and other residents. The current volume of traffic and disregard for the speed limit will increase with increased traffic from the development. Burdens Heath is already a popular spot for young drivers who slow right down to their speed along the straight road. Furthermore, drivers frequently fail to slow down when entering the village. The presence of more cars travelling through Cold Ash, Upper Bucklebury, Chapel Row, and Bradfield Southend to avoid the congestion makes it even more dangerous to maintain my property and walk into the village. Harts Hill and Burdens Heath are narrow roads that cannot safely accommodate the increased volume and size of vehicles.</p> <p>2. LOCAL HEALTHCARE SERVICES: The current NHS healthcare services cannot meet the demand, and it is already difficult to get an appointment due to a shortage of GPs. The extra strain from the increased population will only make it worse. Thatcham cannot keep up with the volume of patients and regularly cancel appointments, which can take over a year to reschedule. This makes it harder to access dental services.</p> <p>3. ENVIRONMENTAL FACTORS: My property is surrounded by ancient woodlands and heaths that support a significant population of deer, which roam freely and frequently cross Burdens Heath, Harts Hill Road, Upper Bucklebury, Broad Lane, The C. at the rear of my property in the area where the proposed development will encroach on their habitat. The increased traffic will increase the number of accidents involving deer, which will reduce their population and pose a serious risk to the deer. Upper Bucklebury to escape urban areas and enjoy the countryside, wildlife, and views. The proposed development will impact on and protected species in the area, such as the Great Crested Newt, which requires a licence from Natural England to be aware if such a licence has been granted.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Adams, Dawn
<p>Consultee Full Name</p>	Dawn Adams
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS63
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 21:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to submit my very very strong objection to the housing development that has been planned for between Thatcham and the A4. I feel really distraught at what is being proposed, the building of 2,500 houses on grass and farmland! This development will cause to the infrastructure to the A4 corridor and surrounding areas is extremely disturbing. The pollution with the added car fumes of possibly 5,000 more cars crawling along the already congested, slow moving, one lane A4 road is a real concern. I have a lot of empathy for the residents and wildlife of the area, if such a development were to go ahead. Apart from the fact, the

	<p>between the villages of Thatcham and Midgham, is going against the ruling, that there should be no joining of villages fields that separate the two villages are used to be built upon.</p> <p>In the late 1970's the housing development of 6,000 houses in Lower Earley in Reading was at the time considered West Berkshire are considering building 2,500 houses between two old historical villages, it is nothing short of an ad</p> <p>I am a regular walker in the countryside of Midgham and Bucklebury and I see it as an area of natural beauty of rolling wildlife. On the field of Cox's Lane I have often seen Brown Hare and from May when the field is laying fallow I have seen getting to be a rare sight in our countryside, these sightings would be lost forever if houses were built on these fields set adjacent to the fields, in fact I saw a badger out foraging when returning in the evening from the local pub quiz la</p> <p>This habitat will be destroyed by housing just like the countryside is being destroyed throughout rural England. The countryside everyone to enjoy.</p> <p>The health and wellbeing of the local people is also being put at risk, as the threat of this development makes for nothing positive with this proposal for the current residents, it only takes away from the quality of living in the countryside. What happened to the mantra of "Walk in the countryside for your health" that the government was so keen the population</p> <p>There are not enough Doctors, Dentist, Banks, Post Offices and Amenities for the population of the local villages as the car journeys along the A4 are already slow and frustrating it can take more than half an hour just to travel into Newbury is faster to walk at times! The idea of thousands of more cars trying to join the A4 from a huge housing estate is a lot more Schools, Doctors Surgeries, Dentist etc to accommodate the new housing population will not help the situation for anyone. I think the area of West Berkshire has had it's fill of housing development. I have noticed housing developments near Henwick and Woolhampton and along the A4 towards Reading.</p> <p>It will not make any difference to me, if there is a revision for a reduced number of proposed houses of the development over a period of time, as I don't trust the Developers, and unfortunately, I don't trust Councils, as often these arrangements are made up there minds that, "the thing is going ahead" and I won't change mine mind that I am utterly opposed to any development and farmland! I have heard with concern that a resident of the area, that attended a Parish Council meeting to appeal for a halt to fight this housing planning application was treated very rudely and dismissively.</p> <p>It is not a question of "not in my back yard" as I would be opposed to any destruction of meadow land for building housing. It would be interesting to know where the developers and those in agreement with blighting this area of West Berks live, as I think their plan for housing is NOT IN THEIR BACKYARD!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Yes people need houses and there are suitable sites for them to be built on but losing the countryside for concrete is</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Morgan, Sue</p>
<p>Consultee Full Name</p>	<p>Sue Morgan</p>
<p>Consultee Organisation</p>	

Agent Full Name	
Agent Organisation	
Comment ID	PS67
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	15/02/2023 18:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<ul style="list-style-type: none"> • Traffic – increased traffic through Upper Bucklebury and other villages; The scope for accidents is already too large. • Pressure on secondary schools – Kennet is already over-subscribed; accommodation for additional secondary schools is specifically stated. We need a new Secondary School to accommodate the extra children. • Consequential damage to the Common – increased footfall; increasing damage to an ecosystem of national importance. The width and muddiness of the footpaths through to Common were evidence that these are already heavily used. • Environment – Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive environmental gain. Flora and fauna will not make a home in brick and concrete! • Pressure on medical & complementary services – additional GP surgeries are not part of NHS strategy for the region. It takes weeks to get a non-emergency appointment at Chapel Row Surgery and it is just not feasible for it to serve any more. • A 'Country park' – this has a specific accepted definition which is not met in this Plan. The three small, isolated areas of land on the boundary have no meaningful environmental value or commitment to exclude subsequent development. I am not satisfied with an insubstantial 'nod' to acknowledge the importance of our environment. • Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively merge and lose its identity. Not only have residents chosen this place to live based on its rural identity but the Plan is disregarding those born and bred in the village and have a right to expect their community identity to continue. • Number of houses now "at least 1,500" – From an initial site assessment of 2,500 of which 1,250 were to be built in 2036, the Plan in fact increased to 1,500 houses because the Plan extends to 2039 rather than 2036 (as originally proposed) and up to 50 would be more realistic.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	No

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<ul style="list-style-type: none"> • Traffic – increased traffic through Upper Bucklebury and other villages; The scope for accidents is already too large. • Pressure on secondary schools – Kennet is already over-subscribed; accommodation for additional secondary schools is specifically stated. We need a new Secondary School to accommodate the extra children. • Consequential damage to the Common – increased footfall; increasing damage to an ecosystem of national importance. The width and muddiness of the footpaths through to Common were evidence that these are already heavily used. • Environment – Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive environmental gain. Flora and fauna will not make a home in brick and concrete! • Pressure on medical & complementary services – additional GP surgeries are not part of NHS strategy for the next 10 weeks to get a non-emergency appointment at Chapel Row Surgery and it is just not feasible for it to serve any more. • A 'Country park' – this has a specific accepted definition which is not met in this Plan. The three small, isolated areas of land on the boundary have no meaningful environmental value or commitment to exclude subsequent development. I am not prepared to make an insubstantial 'nod' to acknowledge the importance of our environment. • Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively merge and lose its identity. Not only have residents chosen this place to live based on its rural identity but the Plan is disregarding those born and bred in the village and have a right to expect their community identity to continue. • Number of houses now "at least 1,500" – From an initial site assessment of 2,500 of which 1,250 were to be built, the Plan has in fact increased to 1,500 houses because the Plan extends to 2039 rather than 2036 (as originally proposed) and up to 50 would be more realistic.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<ul style="list-style-type: none"> • Traffic – increased traffic through Upper Bucklebury and other villages; The scope for accidents is already too large. • Pressure on secondary schools – Kennet is already over-subscribed; accommodation for additional secondary schools is specifically stated. We need a new Secondary School to accommodate the extra children. • Consequential damage to the Common – increased footfall; increasing damage to an ecosystem of national importance. The width and muddiness of the footpaths through to Common were evidence that these are already heavily used. • Environment – Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive environmental gain. Flora and fauna will not make a home in brick and concrete! • Pressure on medical & complementary services – additional GP surgeries are not part of NHS strategy for the next 10 weeks to get a non-emergency appointment at Chapel Row Surgery and it is just not feasible for it to serve any more. • A 'Country park' – this has a specific accepted definition which is not met in this Plan. The three small, isolated areas of land on the boundary have no meaningful environmental value or commitment to exclude subsequent development. I am not prepared to make an insubstantial 'nod' to acknowledge the importance of our environment. • Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively merge and lose its identity. Not only have residents chosen this place to live based on its rural identity but the Plan is disregarding those born and bred in the village and have a right to expect their community identity to continue. • Number of houses now "at least 1,500" – From an initial site assessment of 2,500 of which 1,250 were to be built, the Plan has in fact increased to 1,500 houses because the Plan extends to 2039 rather than 2036 (as originally proposed) and up to 50 would be more realistic.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	No
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	No
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Winter, Robert
Consultee Full Name	Robert Winter
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS71
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	16/02/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The above plan for NE Thatcham has been poorly thought through with numerous reasons why it should not proceed.</p> <p><u>Location</u></p> <p>This is a totally Greenfield site on a relatively steep hillside, adjoining areas of Outstanding Natural Beauty, and ultimately having a significant impact on these areas and the local natural diversity.</p> <p>On the wrong side of Thatcham for major business, shops and arterial roads.</p> <p>Too far away from Thatcham Town Centre and Railway station to encourage walking, along with the steep hill on one side.</p> <p>Effectively cutting the natural break between Thatcham and upper Bucklebury.</p> <p><u>Transport</u></p> <p>On this development there are likely to be 3,000 plus cars. There is very limited work locally so residents will need to travel to the station, (limited parking here with no space for more), and to major shops and schools.</p> <p>No bridge proposed within this development for Thatcham station, thus restricting Southern access and meaning multiple journeys at peak times now all the local routes around the station are full with stationary or slow moving traffic and this site will cause a massive increase in car journeys from this development will increase pollution and carbon dioxide exponentially across the area.</p> <p>With a Northern exit from the site, these journeys will almost certainly come through the villages of Cold Ash and Upper Reading. These villages already suffer from greatly increase traffic at peak times owing to slow moving traffic on narrow roads and 'pinch points', where long queues of stationary vehicles is normal now.</p> <p>Harts Hill is a narrow, winding and steep hill with no pedestrian walkway or safe verges from the junction with the Cold Ash Road and in places has high banks either side of the road. It is exceedingly dangerous for walkers and cyclists, who invariably have to climb up the steep hill, causing much danger to themselves and frustration and dangerous overtaking from cars.</p> <p><u>Flood Risk and Domestic Water</u></p> <p>With all the development on the side of a hill, once large areas are built on and paved, there will be a massive increase in runoff of heavy rain, and very high risk of floods in low areas of Thatcham.</p> <p>Domestic water has to be pumped up the hill to Upper Bucklebury now, and we have times of low pressure due to demand, a leak, or the power or pump fails. As it's up the hill, all the domestic water will have to be pumped to the entire site, which we experience now.</p> <p><u>Education</u></p> <p>Local schools are at capacity now and struggling to employ enough staff. This development will only exacerbate the problem.</p> <p><u>Dental and Healthcare</u></p> <p>Again, local GP Practises and Dental Surgeries are at capacity now and Pharmacies closing. The local NHS Trusts have no plans to expand. I cannot imagine anyone would think it will make financial sense to set up a satellite practise on the site.</p> <p><u>Sport and Leisure Facilities</u></p> <p>More outdoor sports require level playing fields, given that the majority of the site is on a gradient, this will require massive earthworks. There is no real indication of sports buildings and where they would be sited.</p> <p><u>Conclusion</u></p> <p>The whole document of the NE Thatcham LPR is ill thought out with many flaws and questionable processes in its approach, and is against most aspects that are being suggested, with no real thought given to their impacts on society, the environment and the local economy. Overall, a major negative impact, with no foreseeable positives.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Southgate, Bernadette
Consultee Full Name	Bernadette Southgate
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS76
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	18/02/2023 16:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	This plan has caused serious concern since it was originally mooted. Requirement such as appropriate ecological surveys have not been carried out The road systems are NOT safe.

	<p>There has been a desperation to produce a plan and the plan mooted was allowed after a considerable monetary incentive by the developer of the plan.</p> <p>Other significant parts of this plan seem to be hardly legal or safe as mentioned below</p> <p>full assessments not carried out-ecological, amenities, safety</p> <p>development plan drawn up by developer who gave monetary incentive to planning at west berks council</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>this is not a brownfield site. It threatens a AONB. Upper Bucklebury has ancient woodland, common land and a compact road connecting it to Thatcham. Large vehicles and tractors always stray over to the other part of the road. In the recent years the road in one day. Surface water is a problem and Thames water have had many problems in this area</p> <p>Thatcham cannot support proposed development in ways as mentioned. The existing schools would struggle to absorb the development. The health board has not been consulted but is very unlikely to permit another medical practice. The current medical practice is struggling.</p> <p>There are serious flooding issues with this proposed development. There is always runoff water on surrounding roads and there has not been any flood alleviation work in this plan</p> <p>all these issues are being dismissed with out any substantiated evidence to reassure communities</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>schools and medical facilities have not been thought through</p> <p>Roads to larger roads and effect on local villages has not been thought through</p> <p>Transport links are worse than the used to be in terms of bus access</p>
<p>4. Proposed Changes</p>	<p>The best way of making this plan compliant would be to find an area that does not destroy the countryside and takes into account the need for further development as this plan is not appropriate in this area</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To be able to hear justification of the dubious way in which this plan has come about and to be able to challenge the PLEASE NOTE NAME AND DETAILS OF FORM FILLER BERNADETTE SOUTHGATE TANGLE COTTAGE TURNERS GREEN UPPER BUBKLEBURY RG76RD email : bernie@sogat.net
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Fowler, Miranda
Consultee Full Name	Miranda Fowler
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS84
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	16/02/2023 21:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to make an objection to the proposed development in north Thatcham I live on the Dunstan Park estate and there is already a lack of transport links and facilities in that area. Added to the secondary school clearly cannot take an increase of this size of people moving to this area. This is an area of outstanding natural beauty we have enjoyed walking in this area for years and would be so upsetting to see this destroyed. The local villages would be joined to Thatcham and become a very large built-up area that the locality cannot support. It's clear there are better options than this one.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jessop, Martin
Consultee Full Name	Martin Jessop
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS119
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 16:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object to the proposed Thatcham North East Development.</p> <p>There are several reasons but principally there are components of the plan that are unsound.</p> <p>This is a proposal for a minimum 1,500, maximum 2,500 houses. At an average of 2-4 people per house this equates to an additional population and it therefore follows a minimum 3,000 extra cars. The infrastructure of Thatcham does not support this.</p> <p>From an unsound perspective, I would focus on both the Primary Healthcare and Secondary Education provision, both of which are underfunded through. The NHS is already struggling to cope with the growth in the Thatcham population following the Kennet Health Centre. The closure of GP's. As regards Education, Kennet School is at capacity and there appears to be no provision to fund or locate a new school.</p> <p>I live in <address redacted> and it is already difficult to turn right or left out of Simmonds Field onto Floral Way with no alternative route to Newbury as the A4 is usually congested due to amount of traffic, traffic lights and cycle lanes. The additional volume of traffic from a housing estate will only add to the congestion which is unsafe from an Environmental and pollution perspective. Further, the railway station is a dead end Station due to the level crossing will only worsen in the absence of a bridge. Parking at the station is also limited. The road is narrow and a new road but a new estate will add to the amount of traffic both towards Reading and Newbury. A dual carriageway all the way would be needed to cope this additional volume.</p> <p>The countryside around Thatcham enhances the area and ticks all the boxes around Environment. A development of this scale would be a major loss to the area.</p> <p>This Development scheme is not suitable and I recommend its withdrawal</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Proudfoot, John
Consultee Full Name	John Proudfoot
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS123
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	21/02/2023 13:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	<p>WBC LPR Regulation 19 Objection</p> <p>I am objecting to the above plan as I find it unsound</p> <p>Transport</p> <p>Harts Hill is already a busy road and at peak times traffic is backed up the hill in an attempt to access Floral Way. At redacted> we often have to wait for some time to access Harts Hill as traffic both ways can be very heavy. An addition exacerbate this problem on this very busy road with no pedestrian pavement. I have on a number of occasions witnessed the blind bends on this road.</p> <p>The addition of these proposed houses would also have an impact on traffic going into Newbury and traffic accessing has to cross over the Thatcham railway crossing. Traffic on some occasions has been backed up to the A4. An addition add to this problem unless some major road improvements are implemented and a bridge across the railway and river.</p> <p>I cannot see what purpose or benefit the proposed car park at Harts Hill would be!</p> <p>Healthcare</p> <p>We already have long waits for appointments to see doctors and rarely get to see our own doctor as we have to take This results in the personal relationship breaking down and can create a lack of confidence.</p> <p>I am fortunate to have a local dentist who I have been with for many years. My wife had to register with a dentist in P as there were no options in the local area.</p> <p>My concern is that without a guaranteed provision of a primary care medical facility the possible impact of an additional a meltdown of the existing healthcare facilities.</p> <p>Environment</p> <p>It looks as if the WBC documentation is printed off from some template! It is obvious that detailed investigation and n been completed and evidence is not available.</p> <p>Education</p> <p>The LPR is extremely vague in providing details for Nursery, Primary and Secondary education. This again shows a l costs. A number of primary schools are oversubscribed. Kennet Secondary is well oversubscribed with no possibility An additional 1500/2500 houses would necessitate pupils having to be bussed to Theale or Compton if they have ca</p> <p>There is a lack of evidence that the proposed funding will meet the Councils obligations to provide the required education sports fields required for a modern Secondary School.</p> <p>I hope all of the above points will be considered</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Portsmouth, Kate
Consultee Full Name	Kate Portsmouth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS128
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	19/02/2023 10:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	No

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>I am writing to object to the planned development in northeast Thatcham as I find this unsound.</p> <p>As a long term resident of Thatcham, I am concerned about this development for a variety of reasons:</p> <p>Flooding</p> <p>We were seriously impacted by the floods in 2007 and I am deeply concerned about the impact this new development will have. Please can you confirm what Thames Water's view of this development is? During periods of heavy rain there is concern that despite the apparent 'flood alleviation' works which have been completed. I think the impact on both the local houses, the Avon and Avon canal, and the river Kennet will be highly detrimental. Have studies been completed into the environment impact of this development?</p> <p>My other concern relates to drainage. The sewerage works in Thatcham are old and I am concerned that an additional development will overload the system completely.</p> <p>Transport</p> <p>The impact of the additional traffic created by residents of 1500 new houses is going to be enormous. There are already queues during the rush hour on the A4 and surrounding roads, in particular Floral Way. How will this traffic be mitigated? Thatcham has a bus stop but these are inconsistent and in the case of the train very expensive, so the majority of commuting will be undertaken by car.</p> <p>The crossing at the train station is another area of concern. How will the additional vehicle movements be mitigated? There are already queues, creating delays and having a detrimental impact on the air quality in the local areas.</p> <p>Healthcare</p> <p>The local GP surgeries are already massively oversubscribed – it already takes an average of 3-4 weeks to get a routine surgery and the numbers of patients per GP is already far too high.</p> <p>Although the plans state healthcare provision is incorporated, I see no detail within the plan. How will you recruit GPs to fill the shortage and the local GPs are in no position to deal with additional patients.</p> <p>Education</p> <p>I do not understand the provision for education within your plan? Kennet school already has over 1800 students – how will you accommodate all the extra children without jeopardising their 'Outstanding' status? I do not understand what provision has been made for this either.</p> <p>I hope my concerns will be taken into account when considering this proposal and that common sense prevails and the plan will be declined.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hills, Roger
Consultee Full Name	Roger Hills
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS132
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 11:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	No

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I am writing to submit my strong objection to the proposal to build 1500-2500 homes in NE Thatcham on the grounds of unsound and there are several major flaws.</p> <p>Michael Gove's written Ministerial Statement suggested that the planning inspectorate should no longer override serious concerns sensitive to and reflects local constraints and concerns. You appear to be ignoring that and, unlike other local authorities, making processes until the outcome of the NPPF consultation process is completed and is expected to provide guidance in advance ahead regardless and ignoring local constraints and concerns. As it stands, your plan is woefully lacking in detail in its impact badly on both potential new householders and the established community in several areas.</p> <p>Healthcare</p> <p>Your plan proposes a primary healthcare facility but your document is lacking detail or insight to strategic healthcare. It should have an accompanying Health Impact Assessment (HIA) in accordance with current guidance with Public Health England. The proposed development appears to have been arranged or approved. GP practices in the area are oversubscribed and short staffed. Trying to get a GP appointment is hard enough at the present time and monitoring of existing health issues. Monitoring of my husband's diabetes is no where near as regular as it once was. How will overstretched GP surgeries cope before any alternatives are established or built?</p> <p>Dental Practices</p> <p>When we moved into the area in 2004 we were unable to register with a dental practice in Thatcham. We have to travel to a practice which is not particularly convenient and will become more of an issue as we get older.</p> <p>The local NHS is already struggling to cope. As the community ages more support is needed, not less. You have not provided access to healthcare because you have not provided evidence for the provisions of a viable primary care facility.</p> <p>Schools</p> <p>The provision for secondary schools is not consistent with the council's guidelines for the minimum viable size. The plan has omitted any costs for a new secondary school in NE Thatcham over the plan period. Traffic plans and models for increased traffic built are not considered in the LPR. Local schools are oversubscribed. At present many Bucklebury children go to Kennet while those from development would be given precedence to Kennet while those from Bucklebury would be limited to The Downs rather than result in siblings going to different schools and may impact their mental health.</p> <p>The LPR is inconsistent, incomplete and contradictory on the provisions of secondary schooling and, therefore, unable to make arrangements for suitable school provisions.</p> <p>Transport</p> <p>You predict "some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury". Harts Hill Road is a narrow road with no pavements or lighting which is favoured by cyclists. Increasing the volume of traffic on this road is dangerous. There is no proposal for proposing a new priority junction to access Floral Way and Harts Hill Road. It is stated that results from the modelling of traffic problems. The document has no modelling results for this and, more worrying, there are no drawings for the proposed junction drawings for all other proposed junctions so why not for Harts Hill which is the narrower, more winding road? The Statement suggests your assessment is that the policy is likely to have a positive impact on road safety as safe travel will be critical. A car park on Harts Hill Road and planning an exit at the north of the site onto Harts Hill is contradictory to your assessment of impact on road safety. It was also suggested the policy is likely to have a significant impact on walking, cycling and public transport should be designed with these in mind. Your plan, as it stands, will put more traffic on inadequate roads and have the potential for accidents resulting from increased traffic.</p> <p>Parking is limited at the train station and there are often already a build up of lengthy traffic queues and time delays at the development site was discounted despite it offering to build a road bridge over the train tracks. How does your proposal for vehicles positively impact on public transport? I would suggest it will do the opposite.</p> <p>Environment</p> <p>The proposed development will have a significantly negative impact on the environment.</p> <p>Thames Water suggest the council has not properly consulted with them over the time needed for water provision and how the community just accept drops in water pressure when demands are too high and accept there will probably be fewer rivers? I think not.</p> <p>Proposals for country parks have been downgraded to undefined community parks. How is this going to protect the environment and enjoyment of it?</p> <p>The LPR states its intent for SP17 is to drive additional traffic (cars and people) into the AONB. This is completely in contradiction to the vision for Bucklebury Common which is focused on not increasing human pressure on the fragile ecosystems they are. Lockdowns highlighted the detrimental impact of increased footfall and the lack of awareness to protect the area. There are people left on paths, dogs chasing wildlife and people walking off defined tracks causing damage. The effects are still being felt.</p> <p>Your own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability. It states that this would need to be mitigated. Where is the detail of any such mitigating measures? Environmental issues are very important and should not be treated in such a disrespectful manner</p>

	<p>The SP17 policy is clearly intending to build as many houses as possible in a small area of environmentally important promises about how the environment will be improved or, if not, mitigated. You have spent a lot of money on consultation is no evidence of any substantial attempt to investigate, analyse and systematically address the consequences of ignoring local concerns and constraints and carrying on regardless.</p> <p>In summary, your LPR has fatal flaws and is unsound.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Larch, Susan
<p>Consultee Full Name</p>	Susan Larch
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS137
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	22/02/2023 12:27:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am objecting to the above plan as I find it unsound. Transport Harts Hill is a very busy road with traffic backing up the hill at peak time's causing us problems trying to get out of Fa pedestrian pavement making it a very dangerous road for young mothers with prams needing to go to the local shop The proposed houses would have an impact on traffic going to Newbury and surrounding areas. What benefits would the proposed car park at Harts Hill have? Education The schools in Thatcham are oversubscribed with no facilities for expansion and so the proposed planning of the ad have a huge impact on children's needs. Healthcare We already have long waiting times to see our GP so building the extra houses would increase this waiting time. I moved to this area 20 months ago and still I am unable to get an NHS dentist so have to travel 35 miles to my old dent How would our doctors and dentists cope with extra houses?

	I hope that you take into consideration of all the local people and reject this planning application.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rowe, Jane
Consultee Full Name	Jane Rowe
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS107
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 14:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the WBC LPR 2023-2039 for the following reasons:</p> <p>TRANSPORT</p> <p>The increase in traffic movements with 1,500 minimum new houses (with something like over 3,000 + extra movements) in Thatcham North a huge traffic problem. There are already substantial delays during peak commuting hours causing congestion at the roundabout (Floral Way/A4) and Harts Hill Roundabout (Floral Way/Harts Hill) with cars travelling primarily towards Reading. The increase in time spent at these bottlenecks, inevitably drivers will seek other routes through Upper Bucklebury, Chapel Row, and Reading in the mornings and the reverse in the evenings. It is already apparent that traffic avoids the "Chicanes" in the village and takes alternative small lanes around the village or even into the Pang Valley to reach their destinations. These vehicles (cars) are travelling unsuitably fast causing damage to road surfaces not designed to take such volumes of traffic, and additional damage to other vehicles on these single track roads. Drivers have scant regard for local people (pedestrians, horse riders, cyclists) and their routine neither slowing down nor thanking them for letting them pass safely. I live on <address redacted> (I am also a parent) and I am having to watch out for cars travelling too fast without due care and caution, often having to take to the verge quickly.</p> <p>With regard to Thatcham North residents being encouraged to walk, cycle or use public transport, this seems ill thought out. The Town Centre, which has little to offer apart from 2 supermarkets, seems highly unlikely for all but a few very fit residents with heavy, bulky shopping. Walking to the station for commuting purposes, in office attire, is also unlikely. Inevitably additional traffic to enable people to catch their commuter trains, for children to reach their schools or to shop in the Town Centre, will increase air pollution. To reduce this, I assume that the council will be providing regular (4-5 per hour) circular route buses (from the town centre and other important locations such as schools, dentists and doctors) at peak times at the least?</p> <p>I also note that a new car park has been designated for one of the most dangerous parts of Harts Hill Road. Why this is so unimaginable. Harts Hill road from Floral Way to Upper Bucklebury is one of the most dangerous local roads with no pavements and at places it is almost impossible for a car and lorry to pass safely.</p> <p>HEALTHCARE</p> <p>There doesn't seem to be a Health Impact Assessment for the provision of health services for the residents of 1,500 new houses (and 1,500 people). Surely, the local services are already stretched with only 3 doctors' surgeries covering an area from Bradfield to Thatcham in between. If there aren't the doctors available it will be difficult to man a 'new' GP surgery on the North Thatcham side. If no more can be provided, there will be a high demand for young and expanding families who regularly need the services of doctors.</p> <p>ENVIRONMENT</p>

	<p>There are already pollution problems on Bucklebury Common from both traffic and those dropping/dumping their litter on the road from Upper Bucklebury to Bradfield. The introduction of a large number of people wishing to use the common for their local 'park' is not substantial enough to support the community, will bring with it more associated problems of pollution, biodiversity and impacting on plants, animals (deer, badgers and smaller mammals including snakes) and birds (partridges). I have recently seen the impact of irresponsible use of the common where heath fires have been started, destroying the area and causing danger to local residents (Upper Bucklebury, August 2022). We have been lucky that we did not see instances in the London area last summer which destroyed residential homes as well as the environment.</p> <p>EDUCATION</p> <p>Being an area of residential growth, Thatcham is inevitably needing to provide the necessary schooling required from primary school places are particularly important – I cannot understand how these new residents are going to be offered places at a school which is oversubscribed. The Supporting Documentation with regard to schools appears to state that £15m will be spent on a secondary school but I cannot see where it is to be located or when it is to be built, so it is difficult to assess the viability of this. It is odd that the study on pupil numbers is dated 2011 – surely things have moved on since then with the increase in local housing. And what about Sports Fields, where will they go on this undulating site.</p> <p>I believe this local plan has not been given enough thought in connection with the placing of housing and the facilities at these sites, particularly NE Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Le Rougetel, Laurie
<p>Consultee Full Name</p>	Laurie Le Rougetel
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS111
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p>	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	21/02/2023 12:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I wish to strongly object to the Thatcham NE Development as there are many areas of the plan which are unsound.</p> <p>I have lived in the area since 1974 and have witnessed a complete transformation of what was once a beautiful rural area. As change happens but I will hopefully not be around too long (I'm 71) to witness this monstrous plan come, if it does, to the village of Bucklebury, a place I have loved for nearly 50 years.</p> <p>Top of the list of countless objections is increased traffic through the village. Harts Hill is already a very dangerous road with the lorries that thunder along it at speed and peak time traffic along The Avenue in Bucklebury has turned a once quiet residential motorway.</p> <p>I believe there is a plan for an exit at the north of the site onto Harts Hill which only became apparent last month. When it seems, only head in one direction towards Upper Bucklebury where it will split sending traffic through Cold Ash, Upper Bucklebury and the village. And the council thinks this will improve road safety on our pavementless small county roads!!! I'm glad I'm no longer able to enjoy long country walks. I do not believe for one second there will be a positive impact on road safety.</p>

	<p>My second main objection is the impact of so many houses on the environment. A major greenfield development in a Beauty? When there are other more suitable sites? It's beyond belief that some vague proposal for two "community environment.</p> <p>Bucklebury Common, its ancient woodlands and heaths will, without question, be impacted negatively. I believe a pro as much. Hardly rocket science!</p> <p>Bucklebury Common management have been focusing on not increasing human pressure on eco systems they have and protect. Nightjars to name but one increasingly rare bird to visit the heathlands.</p> <p>The ever growing number of dogs let loose on the common at nesting time has an effect on that.</p> <p>Finally, I read that the council has not consulted properly with Thames Water over the time needed for water and sewer of a major flaw! One of many.</p> <p>I sincerely hope the plan is dismissed on the basis of a defective Regulation19 consultation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wall, R
Consultee Full Name	R Wall
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS118
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	Letter

* Unknown	
Response Date	20/02/2023 15:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I feel compelled to write concerning the development of 1500 proposed houses to be built in the A4 Thatcham/ Bucklebury area. I feel the proposal inappropriate.</p> <ol style="list-style-type: none"> 1. Traffic in the lanes of Bucklebury has increased dramatically over past years and where no speed restrictions have been implemented at blind corners the lanes have become quite dangerous. Any large development would certainly add more traffic and noise. 2. I understand no proposal has been made to extend or build new premises at Thatcham School. The school is already at capacity and the addition of homes would most certainly need places for more pupils. 3. Some newcomers would no doubt be expected to join Bucklebury Surgery. This could be critical. The surgery already has a long waiting list for the patients they have. The one chemist at Thatcham, which is completely inadequate does not fulfil the public's needs. 4. The loss of open green spaces for people to enjoy and releases some of life's pressures can never be regained and the benefits of such plans are minimal. <p>Therefore there is no doubt these houses should not be built on the proposed site.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ainsworth, Richard
Consultee Full Name	Richard Ainsworth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS122
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	21/02/2023 10:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>1 Representation on general justification of this LPR</p> <p>The current proposed NE Thatcham development is contradictory to all the reasons employed by WBC to oppose an original WBC objections cited the detrimental effects on the enjoyment of the AONB, long views across the Kennet Valley, separation of Thatcham from surrounding rural settlements. I agree with this original view of WBC as local walking groups participate, regularly enjoy the patchwork of footpaths crossing into the AONB from the development area.</p> <p>This contradiction is not addressed in the LPR. The traffic and environmental studies are deficient and reflect the lack of consultation with rural communities at a time of crisis with respect to Covid restrictions. Many of us in the rural community were astonished that the LPR would support such development.</p> <p>2 Representation on traffic implications</p> <p>The traffic studies have largely ignored the fact that there is an Eastward route parallel to the A4 which traverses the edge of Oak Trees (local beauty spot), then passes through Southend Bradfield and Bradfield College before joining the A340. This route has become increasingly busy after other developments in Thatcham, as an access to West Reading. The displacement of traffic onto this route without quantifying the effects on: -</p> <ul style="list-style-type: none"> • Wildlife (deer and badgers often killed on these unfenced roads). • Pedestrian safety in Bradfield College as the road passes through the heart of the College. • Road safety at the junction where the fast-moving traffic on the A340 is intercepted. • Its enjoyment as a recreational cycling route for nearby urban communities. <p>3 Representation on Environment Matters</p> <p>The destruction of this large agricultural escarpment will have a large visual impact on the Kennet Valley and the surrounding landscape. The developments are constrained. The studies and amelioration proposals contained in the LPR are unaudited, simplistic and do not take account of the importance of this important heathland area which is a rare environmental home for many species.</p> <p>Local community associations such as The Bucklebury Heathlands Group and the West Berkshire Countryside Society are committed to the maintenance of this environment, which is now at risk of degradation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hills, Roger
Consultee Full Name	Roger Hills
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS127
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	17/02/2023 10:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	I am very concerned about the lack of attention to AONB issues as well as the reluctance to discuss the development of Brownfield sites in the area. Many residents of Bucklebury can attest to existing problems with off-roading, littering and noise which will only worsen as the number of vehicles increases. Bucklebury has an ecosystem of national importance. I understand little relevant environmental research has yet taken place notwithstanding there is a statutory requirement to do so.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>As an overview I think the plan has been badly thought through and should be delayed until the various local interest groups Parish Council and Bucklebury says No are satisfied the Plan is in the interests of all, which is not remotely the case. The proposal to build 1250, 1500 or 2500 new homes is understandably causing considerable concern among residents especially Bucklebury. The NPPF consultation process has not yet been completed and I suggest WBC should take this into account, to pause the planning process and to bring forward an updated Plan when the details become known in 2023.</p> <p>I am very concerned about the lack of attention to AONB issues as well as the reluctance to discuss the development of Brownfield sites in the area. Many residents of Bucklebury can attest to existing problems with off-roading, littering and noise. This is a Common which will only worsen as the number of vehicles increases. Bucklebury has an ecosystem of national importance.</p> <p>I understand little relevant environmental research has yet taken place notwithstanding there is a statutory requirement to do so.</p> <p>I further understand there has been very little traffic modelling to take account of the significant increase in vehicles from the new homes. This is evidenced by the comments in a recent edition of the Newbury Weekly News from Mr Brian Little, the Editor. that there is no provision for any increased parking facilities at Thatcham Station and, moreover, there is no provision for parking facilities in the infrastructure plan. Objective 4 of the Sustainability Appraisal- to promote and maximise opportunities for walking cannot possibly be achieved if there is no significant increase in parking facilities. Moreover, it has come to light that the proposed exit onto Harts Hill Road (HHR). This is not a sensible proposal. The road is steep, narrow and winding, is without pavement. Increasing traffic on HHR would not have a positive impact on road safety and would reduce opportunities for walking. A new car park on HHR which would add yet more traffic and may result in an increase in anti social behaviour which is a problem of the area. In short, there does not appear to be a credible infrastructure plan or a willingness to discuss these issues.</p> <p>No clear and important infrastructure plans have been prepared about schools and medical services in the area which are already oversubscribed.</p> <p>There are many other issues which concern me and I may follow up this e.mail before the Public Consultation ends. In the meantime responses to the points raised bearing in mind the Local Plan is intended to take us through to 2038.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Galland, Robert
Consultee Full Name	Robert Galland
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS131
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	19/02/2023 10:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>I am objecting to the Strategic Site Allocation</p> <p>My concerns relate to lack of infrastructure including the road network, healthcare and education, which are already</p> <p>A development of this size will inevitably have a negative impact on the environment, this is a world-wide concern and inappropriate that we should add to that problem.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ostovar, Marie
Consultee Full Name	Marie Ostovar
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS117
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/02/2023 16:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to state my objections to the Thatcham NE Development which I believe is fundamentally unsound. Should the development proceed it will be disastrous for our community. I live in Upper Bucklebury and am concerned that the proposed development will have a number of reasons which I will elucidate.</p> <ul style="list-style-type: none"> • Thames Water is already discharging sewage into the River Kennet, causing pollution, so imagine the increased amount of houses. • There would be increased traffic and congestion on the A4 so drivers would use Upper Bucklebury as a rat-run leading to the destruction of our village. • There would be increased pressure on secondary schools. Kennet School is already over-subscribed ; how will the additional children be accommodated? • There would be pressure on medical and complementary services. The NE Thatcham development plan (SP17) proposes a new healthcare facility with the suggestion that a GP Surgery be offered to the Buckinghamshire, Oxfordshire and Berkshire borders. However, the document is bereft of detail or insight into strategic healthcare planning. Proposals for a major development of this scale and significant impact in relation to its size and location should be accompanied by a fit for purpose Health Impact Assessment in line with current guidance from Public Health England. The HIA should include reference to how the proposals for development will be supported by service providers regarding impact on primary health care services. The development proposals should demonstrate that they have been considered in the design of the scheme because an unacceptable impact on the health and wellbeing of the community would not be permitted. It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, have published a prospective HIA specific to the proposed North-East Thatcham development. • It is also of concern that there appears to have been no direct engagement between the North-East Development Plan and local GP practices. Few new GP practices are commissioned by NHS England, even where they consider there to be patient need. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group confirm there is a shortage of GPs in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham in the foreseeable future. • There would be consequential damage to the Common – increased footfall by design, increasing damage to an ecologically sensitive area. • Environment impact – greenfield development abutting an AONB with no up-to-date evidence or strategy for positive environmental gain. • Poor excuse of a country park – now reduced to three small, isolated areas inside the proposed settlement boundaries, with no value or commitment to exclude subsequent development. • There is a lack of a strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively merge and Bucklebury will lose its identity. • The number of houses now “at least 1500” – from an initial site assessment of 2500 of which 1250 were to be built, the number has now increased to 1500. Who is to say that this will not increase to 2500 just to satisfy a developer’s profit? <p>For all these valid objections I urge you to refuse this development.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brown, Dom
Consultee Full Name	Dom Brown
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS121
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	20/02/2023 20:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to you to object to the WBC LPR Regulation 19, I have laid out my reasons for my objections below.</p> <p>WRT Transport;</p> <p>There are plans for the traffic from the proposed housing estate to exit to Floral Way and the A4. These roads are busy times with regular tailbacks for several hundred metres from the roundabout at SSE going towards Reading in the morning and evening. This is already an everyday occurrence.</p> <p>There is no provision in the plan for how to make alternative forms of transport (ie. not cars) safe or even provision for them.</p> <p>The plan predicts that some traffic would go to wider rural routes which are not adequately provisioned for this (no parking).</p> <p>It is unclear how if a secondary school were provided adequate transport links would be provided. I would encourage the council to visit Kennet school in the morning and at closing time to get an idea of the impact which is currently what local residents experience.</p> <p>Paragraph 3.26 proposes new junctions on to Floral Way and Harts Hill Road. These roads being steep and already busy, this is not either a safe or a practical proposal. I also noted that there are no modelling results to back up the statement in the plan that this will not cause problems.</p> <p>The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Plan for the North East Thatcham area against key Sustainability Objectives. Objective 4 is – To promote and maximise opportunities for sustainable transport. The SEA makes the following assessments:</p> <p>‘To Reduce Accidents and Improve Safety’</p> <p>Council Assessment - The policy is likely to have a Positive Impact on road safety as safe travel will be critical to the success of the development.</p> <p>I question this conclusion and suggest to the council to reconsider how the LPR is likely to have a positive impact on road safety.</p> <p>There is also the following assessment:</p> <p>‘To increase opportunities for walking, cycling and use of public transport’</p> <p>Council Assessment – Significant Positive Impact</p> <p>Council Commentary - The policy is likely to have a significant impact on walking, cycling and public transport as the development will be served by these modes of transport.</p> <p>The LPR does not provide sufficient evidence to come to this conclusion. Again I would ask for more concrete data on how this is to be achieved.</p> <p>WRT Healthcare;</p> <p>Though the NE Thatcham plan (SP17) proposes a primary healthcare facility suggesting a GP surgery be offered the development in the background to strategic healthcare planning. A Health Impact Assessment should be provided for a development of this scale.</p> <p>Such an assessment should include reference to how the proposals for impact of the development have been discussed with the providers. This omission implies there has been no engagement between the NE Thatcham Development Consortium and the providers.</p> <p>The general shortage of GP's is a well reported fact, and it is currently going in the wrong direction. Though the plan suggests there is nothing to suggest that there will be GP's to staff it or that it would make financial or organisational sense to do so.</p> <p>As a general comment the practises in the area are already overstretched. With the closure of local pharmacies (and the loss of pharmacy workers as GP's (https://pharmaceutical-journal.com/article/news/nearly-three-quarters-of-pharmacists-considered-leaving-profession-in-the-past-year-finds-rps-survey))</p> <p>I don't have faith in the LPR addressing provision of local health care.</p> <p>My concerns for dental services in the area are similar to the above and are not addressed by the LPR.</p> <p>WRT Environment;</p> <p>There is not sufficient evidence to support the council's claims that SP17 will have a positive impact on the environment. It should only be considered to have a negative impact.</p> <p>I do not consider the mitigation of the environmental impact of the NE Thatcham development to be met by the provisions described in the LPR.</p> <p>The LPR states that a sustainability charter is required to establish how policy requirements will be achieved and that this will be done through various strategy documents (including one specifically on ecology). These strategy documents have not been made available for consultation.</p> <p>The claimed provisions for green space via the proposed country parks will be sufficient for the number of people intended to live in the area.</p> <p>I noted how the original Thatcham Growth Plan referenced country parks. The proposal for these were vague initially and referred to community parks, the difference between the reference is not clear. The commitment from WBC to protecting the natural environment is not clear in the plan.</p> <p>The sustainability appraisal in the plan is contradictory in saying on the one hand that since the development is being built the impact on environmental sustainability would be negative and on the other hand that it would have an overall positive impact.</p> <p>The overall impression of the plan with respect to the environment is that there is not a convincing attempt address the environmental issues.</p> <p>WRT Education;</p>

	<p>The LPR does not provide detail on the provision for Nursery or early years education.</p> <p>With regard to Primary education there is no data on the planned number of schools or form entry requirements.</p> <p>The sum quoted of £12 million to be contributed by the developers is based on 2011 data. It is now 2023 and it is not clear. The timing of the school provision is not clear. Feasibly this could be towards the end of the duration of the LPR.</p> <p>With regard to Secondary education there are no details of the land to be provided for this provision.</p> <p>The statement that the study has not engaged in a detailed demographic prediction and modelling exercise, has not assessed the capacities of existing schools and intends to address this in more detail as the development progresses implies a lack of contingency in place.</p> <p>I would suggest this section is revisited with more up to date data and at least an effort at more detail.</p> <p>The LPR mentions provision of sports fields. Where these are to be situated is not clear. Additionally there is no mention of...</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Ainsworth, Jennifer
<p>Consultee Full Name</p>	Jennifer Ainsworth
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS125
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p>	E-Mail

* Unknown	
Response Date	21/02/2023 16:44:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Representation on Healthcare</p> <p>The development plan (SP17) proposes a 450sq m primary healthcare facility on site. However, no evidence exists to have been in direct contact with the three general medical practices affected by the impact of the development. Nor indeed if NHS England would commission a new practice. So, there will be a significant negative impact for the existing community onto the new development.</p> <p>The local GP surgeries are already overstretched. It is taking 3 weeks to see a GP at Chapel Row Surgery.</p> <p>Similar concerns exist regarding Dental Services. There are no dental practices in Bucklebury or other local villages of Chapel Row and Southend Bradfield. Already residents must drive to Reading, Pangbourne and Newbury for dental assistance and unsuitable country roads. There is no evidence that the need for dental provision has been considered in the development.</p> <p>Conclusion, as a <address redacted> resident I object strongly to the new proposals on the grounds that provision for primary care has not been met when existing services are already overstretched and thus the proposals are UNSOUND.</p> <p>Representation on Environment</p> <p>This plan which proposes a major greenfield development entirely on existing agricultural land will permanently damage the landscape. It totally ignores its impact on the adjoining North Wessex Downs AONB and Bucklebury Common; the landscape.</p>

	<p>from medieval times both in Upper Bucklebury, virtually abutting the northern boundary of the proposed development t Row. Here, traffic from the new development will travel through the mile long ancient Avenue of oaks, first planted to As a resident of <address redacted>, I have witnessed the already detrimental effect on the Oaks and the Lower Comm and conflicts with horses, walkers, cyclists and illegal off road vehicles. The development will lead to huge increases through Bucklebury and Chapel Row further exacerbating the existing tensions.</p> <p>As such I strongly oppose the proposals which will detrimentally destroy the wildlife, flora and fauna and consider the su unproven and unsound.</p> <p>Traffic Representation</p> <p>I query how many representatives from WBC have made a study of the rural roads from the proposed development t Bucklebury, Chapel Row, where I live and onto Southend Bradfield and beyond. No formal, accredited travel survey h are narrow country, bendy roads and where a straight section exists is used as a race track.</p> <p>Yet the plan provides for an exit onto Harts Hill, steep and narrow which WBC admits will displace traffic from the A4 Upper Bucklebury and beyond. These Country roads are already significantly used by local cycling clubs as well as t increasing levels of motor vehicles. They were never conceived to cope with modern traffic volumes and the proposed not positive impact on road safety.</p> <p>I reject totally WBC who state that the proposals maximise opportunities for safe and sustainable transport. The prop</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Sainsbury, Mandy
<p>Consultee Full Name</p>	Mandy Sainsbury
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS130
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 10:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to object to proposed plans to build 1500-2500 houses in NE Thatcham.</p> <p>I have lived in Thatcham for 43 years and before that in Midgham from birth.</p> <p>To build on the land linking Thatcham, Bucklebury and Midgham would be without doubt a terrible decision.</p> <p>The beautiful countryside that I have loved for 65 years does not deserve to essentially be destroyed.</p> <p>I have the usual concerns over infrastructure. Floral Way is already used as a bypass to the A4 with no traffic calming on an already inadequate road.</p> <p>A lack of schools, GPS, police station, rail crossing (that is fit for purpose) is of course a concern but my biggest concern</p>

	<p>In 1970 I attended Kennet school and remember water flowing down Station road.</p> <p>Fast forward to 2007 when Thatcham was flooded. I was working in the Burwood centre and those devastating scenes down the road, houses and gardens flooded.</p> <p>The cottage I grew up in, in Midgham was totally flooded, the sluices were opened to save Thatcham and my family was living there at the time <personal details removed>. His family came to live with me in Thatcham for a time but I could return. The cottage still has damp problems that have never been resolved.</p> <p>Many friends and colleagues lived in caravans and rented while their homes were drying out. It was a devastating time. I walk a lot and I see just how desperately the water wants to flow downwards from Bucklebury towards the canal. It is a disaster.</p> <p>Even with the millions spent on flood alleviation in Thatcham it will never be adequate.</p> <p>Only a couple of weeks ago after heavy rain, the water running at the side of Dunstan park and under Station road was a sight to behold.</p> <p>Building more houses with drives, patios and roads that will take away the natural absorption we currently have is madness.</p> <p>We are barely coping in Thatcham now and this is not a sensible place to build.</p> <p>There must be better options that will not impact our town and countryside.</p> <p>I hope you take on board my concerns and would be happy to attend any meetings.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Copas, David
<p>Consultee Full Name</p>	David Copas
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS134
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p>	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	20/02/2023 11:36:00
Attached Files	David Copas Full response_Redacted.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><i>Extract of response relevant to consultation point:</i></p> <p>Environment</p> <ul style="list-style-type: none"> Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively lose its identity Consequential damage to Bucklebury Common – increased footfall; increasing damage to an ecosystem of national importance Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive impact and overall benefit A 'Country park' – this has a specific accepted definition which is not met in this Plan. The three small, isolated areas of land within the boundary have no meaningful environmental value or commitment to exclude subsequent development <p>Education</p> <ul style="list-style-type: none"> Unacceptable pressure on secondary schools – Kennet is already over-subscribed; accommodation for additional pupils not been specifically stated <p>Transport</p>

- A severe increase in traffic through Upper Bucklebury and other villages will be dangerous; WBC propose a new traffic in and out of the northern end of the development, and a car park, also on Harts Hill, both highly inappropriate
- Severe additional congestion on the A4 will be bad for citizens and business

Healthcare

- Unacceptable pressure on medical & complementary services – additional GP surgeries are not part of NHS strategy

Healthcare provision

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is **no detail or insight** into strategic healthcare planning.

Proposals for a major development that is likely to have a significant health impact in relation to its size and location, require a **Health Impact Assessment (HIA)** in accordance with the current guidance from Public Health England. It is of concern that to how the proposals for development have been discussed with health service providers regarding impacts on primary care. Development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the development and impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that **neither** public and private stakeholders respectively, **appear to have arranged or published a prospective HIA specific to the Thatcham development.**

Tackling health and wellbeing requires a **multi-agency approach**. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to meet the requirements associated with new development. It is of concern that **there appears to have been no direct engagement with the Thatcham Development Consortium and local general practices.**

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand. Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is no increase in other areas of the country. There is therefore **no realistic prospect of a new GP practice being established** in the foreseeable future.

GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable. It would extend the range of services and primary healthcare professionals available on a single site. It would make no financial sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the high computing and staffing costs and encumbrance working across two sites.

There has been **no approach by WBC or the developers to any local GP practice to discuss an appropriate site** which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the village. It is to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. The proposal with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2021.

The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Medical Centre (Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). **All three practices are run by two Thatcham doctors' surgeries** run independently of each other, and their combined lists include approximately 2700 patients under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on services. There are more young children, a higher maternity workload, less local extended family support and there is initially a high demand for permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care.

Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients referred for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of resident dentists (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have consulted any local dental practices regarding the potential impact of increased workload resulting from additional housing.

Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates, 2016). Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established as part of the process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in 2016 provides no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at the heart of the health centre.

Conclusion:

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having approached any health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and will not mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope. The objective of WBC and the Thatcham Development Consortium to improve access to the health service component of community infrastructure has not been met. **There is no evidence for the provision of a viable primary care medical facility.**

Transport

1. Increased Traffic

Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a recurring theme is the impact on the villages. We sought assurances and were led to understand by WBC planners that traffic from the development would be directed onto the A4. This is true but what they 'forgot' to mention was **a plan for an exit at the north of the site onto Harts Hill**. This was mentioned on 6th January when the Transport assessment was published:

Phase_2_Transport_Assessment_Report_July_2021.pdf(westberks.gov.uk).

This is serious for us because traffic from, or to, the site is only going to go in one direction from this exit – **towards the villages**. It is split between the traffic going through Cold Ash and the traffic through Upper Bucklebury and Chapel Row.

The proposed development will funnel traffic from the development and, **WBC predicts, - 'some displacement of traffic from the villages such as Upper Bucklebury'**. This would be where the roads are inadequate, without pavements and have the potential to be dangerous. It also points to the loss of opportunities for walking and cycling – under 'Safe' Transport.

2. Access and junctions

The Transport Assessment says at paragraph 3.26: 'The access arrangements for the northern end of the NET site (with right turn lanes where appropriate) on both Floral Way and **Harts Hill Road**. Results from the modelling suggest that

However, the document has **no** modelling results for this. There are drawings for all the other proposed junctions but not?

3. Car Parks

We have also seen drawings showing **a new car park on Harts Hill**. The purpose is a mystery but will surely add more to an already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park.

4. Safe and Sustainable Transport

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Plan covers the North East Thatcham against key Sustainability Objectives.

Objective 4 is – To promote and maximise opportunities for all forms of safe and sustainable transport. The SEA makes the following points:

- ‘To Reduce Accidents and Improve Safety’

Council Assessment - The policy is likely to have a Positive Impact on road safety as safe travel will be critical to the development.

- ‘To increase opportunities for walking, cycling and use of public transport’

Council Assessment – Significant **Positive Impact**

Council Commentary - The policy is likely to have a significant impact on walking, cycling and public transport as the development will be in an area with these in mind.

Specific Objection: Education - Schools and Sports Field Provision

1 Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Plan. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to assess the impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are **no details** in the LPR of the provision for **Nursery or Early Years** education. Policy SP17 NE Thatcham S17 states that ‘the site will provide Early Years provision’.

The provision for **Primary** school education is **unclear and contradictory**. There is no data or evidence on the plan for the number of Form Entries requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. As the data available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state how many school place provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The **current situation** for secondary school students from Bucklebury is that they have a choice of either The Downs or Bucklebury are in the catchment area for both.

Where schools are **oversubscribed** those children who live nearer to the school are given precedence. This means that those from NE Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is **inconsistent, incomplete and contradictory** on the provision of **secondary schooling** in and around Thatcham. This is a contradiction to the *Supporting documentation. It proposes that the sum of £15 million be contributed by the developers to secondary education. There are **no details of the location of the land** to be provided and hence no possibility of assessing its suitability.

Please see the link below to **The Thatcham NE Development Plan 2020** (part of the LPR *Supporting documentation) https://www.westberks.gov.uk/media/49799/Thatcham-Strategic-Growth-Study-Stage-3-Thatcham-Future/pdf/Thatcham_Strategic_Growth_Study_Stage_3.pdf?m=637910502456970000

49799/Thatcham-Strategic-Growth-Study-Stage-3-Thatcham-Future/pdf/

Thatcham_Strategic_Growth_Study_Stage_3.pdf?m=637910502456970000

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new (6-8 Form Entries) secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the **NE Thatcham development** (which proposed 2,500 houses), **is not sustainable**. Specifically :-

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The **proposed is not sufficient** on its own to fill a 6-8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. The **proposed is not sufficient** on its own to fill a 6-8FE secondary school. **considered feasible for a new school to be smaller than 6FE.**

With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school is not sustainable in this location.

Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on **a study in 2011**. Clearly the use of 11 year old data is inadequate. The Development Plan states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary school demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably education provision will need to be considered in more detail as any development comes forward.

The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for a new secondary school.

In summary, it is therefore clear that the plan for secondary school provision is ‘unsound’:

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education facilities.

Conclusion on Schooling:

West Berkshire Council, as an education authority, has a duty to make arrangements for **suitable school provision** across all school years is **not defined or evidenced in the LPR**.

2. Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide **sports fields has not been evidenced for funding or for a suitable location**.

Specific Objections: Environmental Issues

There are a number of **serious environmental threats** posed by the proposed Thatcham North-East strategic development:

- 1 **Collateral damage** to the **Bucklebury Plateau Biodiversity Opportunity Area** (*see map at end) [in attachment] and heaths, **in particular the Common**;
- 2 Siting a **major greenfield development** in the broader landscape setting of the **North Wessex Downs AONB** of the open countryside by local communities;
- 3 Causing **detrimental impacts to legally protected wildlife** known to be present on the site, whilst erroneously measures can be taken after development e.g. through the vague promise of a 'community park'.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support, **there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, it will have a significantly negative impact.**

For example, the WBC states in the LPR that a **Sustainability Charter is required** to establish how 'policy requirements, the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability) be informed by' various strategy documents (including one on ecology). **Yet, the strategy documents either do not exist or are not publicly available for the Regulation 19 consultation.**

At least **4,000 people will be concentrated in the development site**. They of course must have access to green space for their wellbeing. The claimed provisions for green space cannot satisfy this demand on site. The original Thatcham Growth Strategy proposed **two 'country parks'** spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming the potential for biodiversity enhancement over its current land use. No details were provided about how they would be formed. The feasibility study showed the complete lack of preparation for such country parks, not least that they should be merged, and properly named, to deliver the biodiversity enhancement. Now, in the updated SP17 text, the country parks have been **downgraded to green spaces** which only proves how little commitment WBC has given to protecting the natural environment and public enjoyment.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will be a negative impact on visiting adjacent areas.

Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green space which will 'take advantage of the landscape' to '*facilitate connection to the AONB, and include leisure routes accessible to all*'.

Meanwhile, the management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the site, working to restore and nurture.

In fact, **the LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability** on a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated by whatever whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the project.

However, **the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact** – largely by absurdly ignoring the environmental consequences in favour of social and economic benefits that are outlined in other articles herein).

The overall thrust of **the SP17 policy** is clearly to build as many houses as possible in a small area of countryside, without regard to how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on consultation plans and justify the 'growth' requirement, **there is no evidence of any serious attempt to investigate, analyse and mitigate the consequences. Everything will be all right because their own unsubstantiated policies say it will be.**

For full response see attachment David Copas Full Consultation Response. For map referenced see last page of attachment.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ember, Richard
Consultee Full Name	Richard Ember
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS145
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	22/02/2023 18:13:00
Attached Files	PS145 Richard Ember attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>The 2021 Environment Act states that by the end of 2023, all new developments in England are meant to be providing net zero biodiversity net gain. This means that, before any development begins, there is a legal requirement for WBC to submit a biodiversity net gain plan and proposed biodiversity values of the sites.</p> <p>The SP17 Northeast Thatcham site has a much higher biodiversity range than the WBC might appreciate. There are many habitats on the site but there no firm plans within the LPR to retain or protect these (the ponds are natural habitats to dragonflies, beetles, snails, coots, and moorhens etc) and woodlands (which are homes to muntjac deer, badgers, hedgehogs, nesting reedbeds etc).</p> <p>Furthermore, there is no plan to offset the carbon and methane produced during construction (through tree-planting) or the carbon offset price (Southwark Council use an offset price of £1,800 per tonne). Also, massive carbon sinks will be lost from the soils and woods with over two square kilometres of concrete and tarmac.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The LPR is unsound because:</p> <p>1 Inconsistent with national policy. The National Planning Policy Framework (page 50), ‘Section 15: Conserve and enhance the natural environment’) states clearly that ‘<i>Planning policies and decisions should contribute to and enhance the natural and enhancing landscapes, biodiversity and soils; recognising the intrinsic character and beauty of the countryside; providing net gains for biodiversity and establishing resilient ecological networks; improving local environmental quality; and remediating and mitigating degraded and contaminated land. Policy SP17 contravenes all of the</i></p> <p>This LPR is unsound because, with regard to the SP17 Northeast Thatcham Strategic Site, it is inconsistent with A NPPF.</p> <p>The rationale for declaring the LPR unsound is:</p> <ul style="list-style-type: none"> • Rather than protecting and enhancing landscapes, the LPR aims to destroy valued scenic landscape and biodiversity (carbon sinks) with buildings, concrete, and tarmac. • The LPR bypasses the intrinsic character and beauty of the countryside and overrides the economic benefits of agriculture and woodland. • The LPR prevents net gains for biodiversity by eliminating large areas of meadow and smaller areas of woodland. • The SP17 development will degrade local environmental conditions such as air and water quality and drainage and possible flooding. • The LPR does nothing to remediate and mitigate degraded, derelict or contaminated land and instead it destroys wetland habitats. • There is no reference to an Ecological/Biodiversity plan within the LPR to include wildlife corridors and ponds a legal requirement. There are no firm plans to retain local ponds (which are within the site periphery and are natural habitats for bullrushes, pond weed, freshwater snails, coots, and moorhens) and woodlands (which are homes to muntjac deer, red kites and woodpeckers). These will be impacted or destroyed when construction starts because the SP17 development and there is no buffer zone and no plan to prevent their loss or to provide for future monitoring. • There is no reference within the LPR to compile a ‘Net Zero Carbon’ report detailing carbon and methane emissions from brick, concrete, steel, and tarmac manufacture, and construction vehicle emissions). This should include a detailed plan for how emissions will be offset so that the site becomes carbon neutral. (The offset would need to cater hundreds of thousands of tonnes of emissions). <p>Given the UK is one of the least biodiverse countries in Europe, there is no mention in the LPR how legally-required biodiversity net gains. The Sustainability Charter establishing how ‘policy requirements will be achieved’ has not been compiled.</p> <p>2). Inconsistent with achieving sustainable development. The LPR is inconsistent with WBC’s own Core Strategy Berkshire Core Strategy (2006 - 2026) Development Plan (page 99) states that the Housing Growth Plan will: ‘deliver the West Berkshire between 2006 – 2026 in a manner which will maximise the use of brownfield land and access to brownfield sites’.</p> <p>The SP17 Thatcham NE development is planned for a greenfield, not brownfield site. There are no cost or impact assessment which brownfield sites were selected and why they were eliminated.</p> <p>Decisions to build on any greenfield land should be subject to stringent safeguards because the UK has the lowest land use proportion of greenfield land per square kilometre of anywhere in Europe. Building on open countryside adjacent to built-up areas is detrimental for existing and future communities, animals, and plants in the county.</p>

3). Lord Deben (Chairman of the UK Independent Committee on Climate Change) stated in January 2023 that '*planning decision should be made with climate and sustainability in mind*' (BBC 'Rethinking Climate').

I would assert that West Berks Council in its SP17 Thatcham NE development proposal is not aligned with Lord Deben given **no thought** to climate and/or sustainability.

WBC needs to produce a 'Net Zero Carbon' report detailing all CO2 equivalent emissions expected to be generated (materials - brick, concrete, steel, and equipment) with a detailed account of how these emissions will be offset.

WBC needs to produce an Ecological/Biodiversity plan within the LPR outlining plans for 500 metre-wide buffer zone corridors, and firm plans for retaining and monitoring ponds and woodland immediately adjacent to the site so they are resilient and how a providing net gains for biodiversity will be achieved. Monitoring and mitigation plans need to be 'SMART'.

4). The Thatcham NE development takes absolutely **no account** of the following:

- 1 Carbon-Offset. GHG emissions from construction and building materials including houses, roads and driveway offset of 200,000 to 500,000 thousand tonnes of CO2-equivalent emissions. This could be mitigated by planting trees. There is no mention of a plan to carry out this level of carbon offset. Furthermore, there is no plan for the developer for the carbon generated by their material and equipment during construction (Southwark Council use an offset for the carbon generated by their material and equipment during construction).
- 2 Significant biodiversity loss and habitat fragmentation in an area already under threat.
- 3 Scenic landscape destruction impinging on an Area of Outstanding Natural Beauty.
- 4 Bucklebury Common is a fragile woodland and heath infrastructure. Siting 1,500 to 2,500 homes immediately adjacent to and allowing it to be part of a 'community park' would cause significant degradation to the wildlife pollution and during the hot summers (as there were in 2022).
- 5 Likely subsequent further residential and industrial sprawl along the A4 towards Reading (as has happened on the construction of the Vodafone HQ on a greenfield site).
- 6 Massive loss of local carbon sinks through the destruction of the soils, meadows, wetlands, and woodlands;
- 7 Increased surface runoff into the Kennet River valley and flooding risk to parts of Thatcham caused by the plan removal of soils and replacement with houses and tarmac;
- 8 Increased traffic and vehicle pollution on the A4 to Reading and Harts Hill Road;
- 9 A biodiversity and wildlife 'buffer' zone (of at least 500 metres) between the Thatcham NE development and the site for wildlife to thrive and provide at least an element of local carbon-sink.

5). **The SP 17 is not justified in that it has not demonstrated that it has taken into account reasonable alternatives** that WBC considered any alternative uses for the SP17 land which were ecologically and environmentally beneficial to the area. Alternative examples might have been using the land as a country park or site for a modest-sized wind farm or solar farm essentially looked at a map to say where can we fit a couple of thousand houses? Rather than considering sustainability and destroying the landscape.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

Given the Duty to Cooperate places a legal duty on WBC to engage actively and regularly with the community with regard to the plan. It can be seen how, going forward, the WBC considers the views and acts on the recommendations of those who oppose the plan. So far the LPR complies with the Duty to Cooperate in that it is available for consultation. But the plan is missing a good number of recommendations will be acted upon and there will be opportunities for continued engagement with the Bucklebury community not being steamrollered by local council or government.

4. Proposed Changes

- 1 The LPR is not legally complaint because the 2021 Environment Act states that by the end of 2023, all new developments must be providing a **biodiversity net gain plan** to measure the existing and proposed biodiversity values of the site. The 'Biodiversity Net Gain Charter' has not been issued. There is no record of the number of species on and adjacent to, the site nor any plan to ensure construction to ensure they are not damaged. **A Biodiversity Net Gain Plan, a Sustainability Charter, and a Biodiversity Assessment for SP17 need to be issued by WBC ahead of the LPR.**
- 2 There is no probability of a biodiversity net gain because SP17 is a **greenfield** site. Building on open countryside is severely detrimental for existing and future communities, animals, and plants in the county. More likely there will be a net loss in an area already under threat. The **Biodiversity Net Gain Plan** needs to explain how this will be mitigated and how it will be SMART - Specific, Measurable, Achievable, Realistic and Time-bound objectives).
- 3 There is no reference within the LPR to the generation of a 'Net Zero Carbon' report detailing carbon and methane emissions (from steel, and tarmac manufacture, and construction vehicles) during construction. Furthermore, there is no plan to offset the carbon produced (through tree-planting) or proposal for the developers or WBC to pay a carbon offset price (Southwark Council use an offset price of £1,800 per tonne). **WBC needs to issue a 'Net Zero Carbon'** report detailing emissions, mitigation and offset.
- 4 **This LPR is unsound** because, with regard to the SP17 Northeast Thatcham Strategic Site, **it fails on all the requirements of the Policy Framework** (page 50), 'Section 15: Conserving and enhancing the natural environment'. It is *inconsistent* with the Policy Framework in that it does not recognise the intrinsic character and beauty of the countryside; providing net gains for resilient ecological networks; improving air and water quality; and mitigating degraded land.
- 5 There needs to be an Ecological/Biodiversity plan within the LPR to include **500 metre wildlife corridors** and a buffer zone around the site (between the site and the development and through the site).
- 6 During 2022 there were several heathland fires on Bucklebury Common (a fragile heathland ecology) and the fires are continuing. Locating 4,000 residents immediately adjacent to the Common would increase the risk of woodland fires. WBC has not referenced this in its LPR. WBC needs to generate a report, **in conjunction with Royal Berkshire Council** assessing the fire risk, and how this will be mitigated.
- 7 The West Berkshire Core Strategy (2006 - 2026) Development Plan (page 99) states that the Housing Growth Strategy will be 'delivered through homes across West Berkshire between 2006 – 2026 in a manner which will maximise the use of brownfield land and brownfield services'. The SP17 Thatcham NE development is planned for a greenfield, not brownfield site. Therefore, **the development is not in line with the West Berkshire Core Strategy (2006 - 2026).**
- 8 Lord Deben (Chairman of the UK Independent Committee on Climate Change) has stated that 'planning laws should be made with climate and sustainability in mind'. West Berks Council in its SP17 Thatcham NE development proposal gives **no thought** to climate and sustainability. **This needs to be addressed.**

	<p>9 No account has been taken of the loss of local carbon sinks through the destruction of the soils, meadows, wetlands and trees in the SP 17 area. This need to be addressed in the EIA.</p> <p>0 The WBC needs to generate a report detailing how it would plan to limit further residential and industrial sprawl (as has happened on the A34 north of Newbury following construction of the Vodafone HQ on a greenfield site) of the plan?</p> <p>1 WBC needs to demonstrate that it has considered alternative uses for the SP17 land which are more ecologically beneficial to the community and biodiversity. For example, did they consider a country park or modest-sized woodland to be generated detailing the alternatives considered for the land.</p> <p>2 To counteract the increased traffic and vehicle pollution on the A4 and Harts Hill Road, and in line with the Government's strategy, WBC needs to issue a plan for the use of Zero Emission Vehicles on the site.</p> <p>I personally think that it is a terrible shame that WBC would even consider the SP17 greenfield area for development in the decision-making process. These meadow, woodland, and pond landscapes are becoming scarcer and scarcer in a rural area and biodiversity and scenic landscape. Future generations would not thank WBC for sanctioning such a degradation of the landscape.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dunkerton, Alan and Brenda
Consultee Full Name	Alan and Brenda Dunkerton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS157
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	12/02/2023 15:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I refer to the North East Thatcham Development scheme Transport Assessment where it includes an access to and from this proposal is bordering on the suicidal, Harts Hill Road is dare I say it a 'Challenging' drive to say the least, it is a road with several sharp bends along its length it has a speed restriction of 40 mph until it reaches the boundary with the Village where it reduces to 30 mph, the road itself is subjected to frequent water encroachment from the surrounding fields and as with the snow and early February this year when the temperature drops to below freezing the road surface ices over and several vehicles were frequent with the road having to be closed all be it temporarily many times, there is a likelihood of serious Road Traffic Collisions I myself can recall at least one Fatal Traffic Collision and also several injury Road Traffic Collisions occurring upon this road.</p> <p>The Policies of previous Governments in the reduction of Police Road Traffic Patrols has resulted in a free for all approach to driving standards falling at an alarming rate thereby Road Traffic Collisions from minor right through to fatalities and injuries occurring year as a result.</p> <p>This proposal would also increase the traffic flow through Upper Bucklebury for vehicles heading East towards Reading and part some of these roads do not have pedestrian walkways or footpath increasing the danger to residents on foot, bearing in mind that the footpath serving the residents was removed by West Berkshire Council some years ago.</p> <p>This proposal makes a mockery of the Sustainability Appraisal in the Strategic Environmental Assessment which states that Objective 4 is to promote and maximise opportunities for all forms of safe and sustainable transport with an assessment to improve Safety whatever is the point of seeking professional advice in such matters if it is to be ignored by the Planning Committee's Assessment that this proposal is likely to have a positive impact on Road Safety as safe travel will be critical.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Read, Chris
Consultee Full Name	Chris Read
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS89
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	16/02/2023 16:50:00
Attached Files	PS89 and PS92 Chris Read_Redacted
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I was very disappointed to see WBC has re-submitted virtually the same plan after regulation 18 consultation taking residents observations, and objections. This is not how local plans for much needed local housing should be created. Council officers to discuss topics and raise questions for well informed and evidenced answers at public exhibitions has not been used to hide behind 10,000 impenetrable heavy-weight planning pages and on-line only processes. On-line should have been used for communication - not the only channel. The few physical town hall sessions attended by council officers had to be driven through and even then answers were rarely straight and were lacking evidence to substantiate them.</p> <p>I write this email to you in objection to WBC LPR Regulation 19 as being unsound and out of character for West Berkshire.</p> <p>1. < For full document see attachment></p> <p>2. Education. There is no clear definition in the plan of nursery / early years provision. Any new development will have to provide needed young families to revitalize our aging communities. If this is not WBC's intent then please add that you wish SP10s with over 55s only allowed as residents.</p> <p>The plan has no modelling where pupils will have to go for their education and the subsequent impact on traffic. The walking or cycling will avoid high pollution areas like A4. Also segregated cycleways purely on safety to encourage increase in detailed plans. Currently children in the area have to rely on white lines painted a major national trunk road to protect them from like speeding cars and articulated heavy good vehicles.</p> <p>There is no evidence that the provision of money to be set aside for local primary educations will be enough or that it will help people moving in and starting much needed and loved young families.</p> <p>Kennet secondary school is massively over-subscribed due to great governance, leadership and teachers. However the school (which was built in 1957) and its facilities are over stretched further. Good teachers are in short supply and will naturally leave if they do not have sufficient good quality facilities and teach children in a modern, safe and well provisioned school. Kennet will not be stretched to bursting point. The Kennet campus is not suitable for further development. The area needs a new campus if a significant increase in local population occurs.</p> <p>Further the plan on secondary education is unsound as it has:</p> <ul style="list-style-type: none"> - no model of pupil increase and capacity for surrounding existing schools and guaranteed when new schools will be built - the location of any new school and its suitability (flat site for planning fields and disabled pupils and teachers) - removal of natural escarpment - number of form entries is not clear

- impact to local taxes for additional funding for capital projects required is not clear

3, Environment. The additional footfall in the very nearby Bucklebury Common has not been modelled. This is a frag damage to the Sulham Woods SSSI by the over development in Tilehurst region is a good example of what will happen become a massive muddy track lacking undergrowth and any interesting fauna or flora that it currently supports.

West Berkshire has the character of a rural county that is composed of small communities (25-150 dwellings) that ha surrounded by woodland and pasture. This plan does not support that character, its a massive strip development with to the town of Hungerford. Massive strip developments are not in character of West Berkshire. There needs to be su wooded areas within the development curtilage to compensate for the areas going under the bulldozer. This will help way up the escarpment. All the natural gullies should become permanently protected, with sufficient barriers against un - this will produce natural corridors to wildlife to cross the Kennet Valley floor (again there is no provision for wildlife o plan in natural protected corridors)

The "country / community parks" mentioned are nothing but a couple of very small pastures for people to let their do building will take place on areas of recognised significant biodiversity and put significant footfall pressure on areas o Yet there is no mention of how this with be compensated for. There is no benefit in this plan for environment or biodiv entirely on greenfield site.

The claim in the plan that SP17 will have an overall positive impact on sustainability has no evidence to support it. It of 1500 dwellings with an intention to grow to 2500 dwellings as initially stated (based on exactly the same cartilage, to maximise their returns and ignore the well-being of existing residents and new residents in the development.

4. Proximity to Aldermaston Weapons Establishment. I am somewhat confused that development that is only just ov AWE (bottom of Cox's Lane) should be allowed when Gazeley development was refused as it was about 4 miles from comes to radiation which travels in a straight line or fallout that follows the wind or water movement then surely most o due to AWE proximity.

5. The Process. There has also been no public exhibition for people to locally inspect large scale plans and visual rep types of housing to be built and the social areas to be created. No traffic modelling visualisations with the consequer fumes) on all local roads within a 10 mile radius.

No large scale visualisations of increased flooding risk down Harts Hill that was a "river" of flood water in the 2007 fl

There are no large scale visualisations of the impact to local people on secondary education due to increase in popul have to go in an already over-subscribed Kennet school in a 10 mile radius.

In summary it is my own personal observations that this plan is unsound and out of character of West Berkshire and Ignoring previous very valid objections and observations and taking no evidenced mitigation or change to ameliorate th tax payers and residents well being and good faith in local government democracy and fair treatment.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cairns, Hilary
Consultee Full Name	Ms Hilary Cairns
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS93
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 16:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Regarding the proposed and reduced plan to develop an area of North East Thatcham with 1,500 houses up to the year 2039, there have been many developments over the years (from 1972 when we moved here); in all these developments infrastructure has been built. Tull Way and Floral Way can hardly be called infrastructure, yet they are there to ease the movements from the most part of the site. SP17 it is stated that the mitigation of the development impact on the highways network - this is not shown and at the time it was going to be no improvement to Harts Hill Road, which already carries a heavy amount of traffic.</p> <p>Your policy also states that priority habitats and ecological features will be protected, and yet you also state that all people who live on the land, very hard to achieve both.</p> <p>Policy SP6 states that flood risk for the site will not be increased, but does not state that flood risk to surrounding areas will be almost impossible to achieve with such a huge number of hard standings with houses on. It is also stated that the benefit of the plan is to reduce the risk of flooding. That is hardly something that will endear you to all the people whose houses flooded in previous years and are no longer insure or pay increased premiums.</p> <p>Floral Way was supposed to be the boundary of North East Thatcham. It would be preferable to build a new secondary school centre on part of the proposed site and develop the current Francis Bailey Primary School, Kennet Secondary School and move them on what is a brownfield site that is much closer to the heart of Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Floral Way was supposed to be the boundary of North East Thatcham. It would be preferable to build a new secondary school centre on part of the proposed site and develop the current Francis Bailey Primary School, Kennet Secondary School and move them on what is a brownfield site that is much closer to the heart of Thatcham.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Harrower, Lorna
Consultee Full Name	Lorna Harrower
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS101
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	18/02/2023 13:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF.

* Yes

* No

Please give reasons for your answer

In summary, I find the plan unsound.

Traffic Problems: Without the council stating the potential locations of any additional primary healthcare and dental secondary schools, it is impossible for them to evidence the likely flow of additional traffic from this development in any and improvements to the existing road infrastructure assessed as necessary to accommodate it before this development.

I live in <address redacted>, Midgham, which <address redacted> via Cox's Lane or Church Hill. Both roads are barely the former is single track for most of its length, and the latter single track at certain points with passing places. These traffic is congested on the A4: Last year due to an accident on the A4 the entire length of Cox's Lane, Birds Lane and traffic tried to find alternatives routes around the road blockage. I was stuck in the middle of this for over an hour on my I missed as a result).

These roads are already experiencing more traffic from new builds along the A4 and more locals new to the area ex cars, on their bikes and walking dogs. <Address redacted>, it's more efficient for me fuel-wise (& to avoid risk – turning to use Coxs Lane when travelling to Thatcham and Newbury but it's becoming increasingly dangerous to do so as m single track lanes. Last week, I barely avoided a collision as a vehicle rounded a blind bend at speed here 51.406291, a 4x4 and been able to drive off the track, we would have collided! This was a new driver to the area. It's almost impo along Coxs Lane without encountering two or three vehicles and one driver or another having to reverse back to one. This makes every journey take longer, raises the risk of a collision for every journey, and increases the risk of driver with these roads don't know the passing places, and get aggressive when you try to point out that the nearest passing than for you!

These roads are heavily used by cyclists, horse riders, people and dog walkers accessing public byways and footpa these roads. It is unconscionable for any increase in traffic along Coxs Lane, Birds Lane or Church Hill without an unac of injury to me, other humans and animals. I'd like to see modelling that shows there will be no increase in traffic along impacting on their current use for recreation, leisure and sustainable commuting by bike by the local community.

I also use the A4 to commute to Bracknell for work, travelling through Theale and onto the M4 to do so. The load of t heavy, particularly between 7am – 9am and 4.30pm – 6pm. As commuters, we come to a standstill in Woolhampton locals use the pedestrian crossing to cross the road, and we are regularly stuck in stationary traffic at Pips Way and traffic pumps out exhaust fumes making it hazardous for me as a driver sitting in it, not to mention local residents, pe Midgham train station or along the footpaths along the Bath Road. The commute now takes me 20 minutes longer th in traffic over the past 6 years since I've moved to the area. More traffic using the Bath Road will only increase travel area with emissions.

When I try to exit either Coxs Lane, or Church Hill to turn right to travel towards Thatcham, I have to wait for up to 5 find a safe gap in the traffic. And the risk of a collision is high because there is a constant stream of drivers using the Newbury and beyond. The speed limit has been reduced from 60 mph to 50 mph for safety reasons. But unexpected up make up time makes traffic speed irregular & unpredictable on this road. This makes it very dangerous for anyone traffic! This road simply can't safely accommodate any increase in traffic.

Broad Lane, The Common and The Avenue are already being used as rat runs for people as an alternative to using unsafe driving along these roads as impatient drivers overtake at speed during rush hour. These roads are also regu with our dogs, horses and bikes. We criss cross these roads to find different tracks through the common for walks. In potentially?) will bleed from this NE Development onto these roads making it unsafe for us to use for recreation and pe wooded environment with fuel emissions. This AONB is so revered that it regularly attracts people from outside of the flow of traffic in the middle of this rare and beautiful place will make it less friendly and safe for everyone wanting to

When travelling to Thatcham, I use Hart Hill and Floral Way. Harts Hill has several dangerous blind bends and a steep d in icy conditions. Floral Way is heavily congested during rush hour traffic. May I see the traffic modelling for any junct particular any safety assessment done on the risk to other road users of having junctions on these roads? I can't see encourage safe and sustainable commuting: riding a bike down Harts Hills will be even more perilous?

How will this development have a positive impact on walking, cycling and public transport?

I note the proposal for a car park on Harts Hill. For what purpose?

I'd like to see the council's traffic modelling at the various bottle necks in the area during peak traffic to see what the time (all modes), safety & emissions from this development?

Environment: There are adders where the proposed development is. We know this because our dog ran off on a wa Manor. We found him eventually on private land where the development is intended to be sited. He disturbed an add prevented him being bitten (he was poised to bite it as it reared up at him).

Our friend, a reptile expert, was unwilling to visit the location because this is private land and we didn't want to be fo owner to know what we'd found. In her experience, landowners of development sites have been known to make the

we have kept this a secret. We will reveal the location for an independent assessment to take place once we are sure before that happens.

I note the plan makes reference to providing green space and playing fields for the new households, but again no schools will open their playing fields to the general public is not feasible due to H&S, safeguarding, maintenance issues. If these are not provided, new households will gravitate to other green spaces in the area, increasing traffic in areas around the flora and fauna. There are already a high number of deer, badger and kites struck by traffic on the roads around the area. I fear this will increase with more traffic flowing through our local roads.

I am also a mushroom hunter. Many mushrooms in the Common and surrounding woods only grow in undisturbed soil. The Common is trafficked by locals and daytime visitors. Last autumn we noticed a near total absence of mushrooms during October and November, yet in other woods in the Chilterns and New Forest, they were plenty. It might be because the Common is now a favorite for everything, or because the woods are so heavily used for recreation since covid, that the soil is too widely disturbed? If these woods, the soil will be even more disturbed and the fungi won't have enough time for their hyphae to develop and become devoid of mushrooms & other edibles.

We need a thorough impact assessment to be done on the impact the NE Development plan will have on local flora and fauna.

I and other walkers will also lose access to the popular footpaths from Coxs Lane leading to Colthrop and Upper Buxton. How can we be able to access these areas safely on foot with our animals without these footpaths? This development will limit my access to the countryside I currently enjoy and will impair my ability to enjoy it as a local citizen. I'd like to better understand how the council will compensate the local community for what it will lose in footpath access to areas we currently enjoy?

Flood defence & pollution of river Kennet: Can the council also show local residents how the recent flood alleviation works on a vast paved area (the housing estate & associated roads), and evidence how the consequential run off of water will affect the river further.

Primary & dental care: I am registered at Chapel Row surgery. The medical facility is stretched to capacity with long waiting times. The dispensary regularly operates reduced hours due to demand and recruitment problems. The hours of opening are limited. I struggle to find appointments I can make as a fulltime working person. If more households try to access this facility, the waiting times for professionals are able to give to the current local population. I fear getting a face-to-face appointment will become impossible, my wellbeing at risk.

I am also registered with a dental practice in Tilehurst, some 13 miles away!

As a local resident, I'd like to understand what plans have been created for additional primary and dental care to meet the needs of new households? Not a generic statement that the needs will be met, but something more substantive showing where the council will resource the feasibility of resourcing them and so on. For example, if local facilities struggle to resource their practices, how will the council resource new practices?

House price devaluation/ other options: Many home owners here have paid a premium to live on the doorstep of a quiet & quiet, less congested roads and access to open countryside. What consideration has the council given to changing the road layout and the impact this will have on the value of our properties?

There are thousands of individual building plots sites which could spread the load of this proposed housing development across the county for new housing development within the country without degrading the rural landscape.

The council must surely have access to a register of potential individual building plot sites within the county that it reviews for developments in greenbelt areas as part of its due diligence?

Will the council share this due diligence work and all rejected planning applications for new builds for the past 5 years? Is it the imperative to use this greenbelt land as opposed to developing other options?

This should form part of the consultation documentation.

Consultation: I am an intelligent, educated and interested local resident, yet I have found accessing documentation for the consultation difficult. I work long hours full time and cannot get to the offices to view documents in person. When the council's website goes down, that hardly helps us review documentation when we're not at work either.

I am neurologically divergent and struggle to read the documents on line which are not written with the needs of people who are dyslexic, and equally intelligent and interested. He wants to object but will struggle putting anything into writing. Many people are dyslexic and computer illiterate. They cannot get to your offices nor access online content.

I find this entire "consultation" to have been discriminatory. I'd like the council to evidence that fact that they have done their best to get local residents like us informed, engaged and able to contribute before this plan goes any further. I thank the council members who've gone over and beyond to explain things to us in a way we can understand as best they can. Something our local council has not.

	<p>May I also ask why the exit onto Hart Road at the proposed North of the site was only revealed to the local community late disclosure is disingenuous. This fact, and the impact this will have displacing traffic through Cold Ash, Bucklebury would have encouraged more local residents to get involved.... had they known.</p> <p>I believe the council has paid lip service to policies it must comply with, and to an extent, outsourced its responsibilities to vested and commercial interest in this proposed development - to the detriment of the local community.</p> <p>This fact, the inaccessibility of the planning documents and the late disclosure of key facts makes this application un-</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Webber, Graham
Consultee Full Name	Graham Webber
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS105
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	20/02/2023 10:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am contacting you to express my objection to the proposed Thatcham NE Development which I believe to be unsound.</p> <p>My main areas of concern are as follows:</p> <p>Transport: there will be a significant addition to the amount of traffic in the locality in an area which cannot be developed particularly along Harts Hill which is difficult to negotiate at the current rate of traffic flow.</p> <p>Healthcare: the plan contains no detail relating to the enhancement of current healthcare provision across all relevant areas and no liaison has taken place to develop a plan to address this significant issue.</p> <p>Environment: the enjoyment of the local open spaces and wildlife is an important factor for residents in the area. The local environment and this can only be affected negatively by such a large development. There is no evidence that these factors have been protected.</p> <p>Education: the current situation in the area regarding educational provision is already stretched and the proposal to build new schools is not in enough detail to make a sound decision as to whether or not to support this element of the plan.</p>

	In conclusion I am opposed to the plan over a range of very important factors
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Anns, Barry & Charlotte
Consultee Full Name	Mr & Mrs Barry & Charlotte Anns
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS135
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/02/2023 18:56:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>On behalf of our family, we are objecting to the WBC Local Plan Review (LPR) 2022-2039 as we find it unsound.</p> <p>Increased traffic</p> <p>The traffic on Broad Lane is already too busy.</p> <p>During mornings and afternoons as people commute through the area, there is a lot of traffic. Outside our own house as people have disagreements outside the speed calming chicane.</p> <p>Having stood and watched the traffic at different times of the day, you generally find that people appear to be driving cars coming from the lower priority side. Traffic is too high in volume to just be local traffic, many local friends and family as a "rat run" to avoid the A4 when trying to get to Reading, Pangbourne, Newbury, Thatcham etc.</p> <p>With the plan for an exit to the north of Harts Hill Road, and broadly more traffic in the area from the proposed housing, it will get worse which will further reduce quality of life and pollution for local residents.</p> <p>Furthermore, the pavements are not wide on the opposite side of the road, and as previously noted, the chicane traffic lead to accidents and discourages further walking and cycling which are better for the environment.</p> <p>Access, junctions and car park</p>

We are concerned to see that at the northern end of the NET site, there are new priority junctions proposed. As noted, these could lead to more traffic problems, pollution and potentially safety issues.

Safe and sustainable transport

We do not see how the proposed development in the plan will reduce accidents and improve safety, nor increase opportunities for use of public transport. The assessment appears completely flawed to us as local residents, and frankly, a “box-ticking exercise” is an after-thought, not a properly considered part of the LPR.

Healthcare

Healthcare does not appear to have been considered properly at all. There has not been a multi-agency approach or a proper Impact Assessment.

All GP practices in the area are already overstretched and based on what has been put forward in the plan, there are no plans from developers to engage with healthcare providers.

It would not seem to make financial sense for a new practice to open based on what is currently detailed in the LPR. The proposed primary care site appears to be unrealistic and unsuitable, and there is no reasonable mitigation for 1,500 or more new residents.

We are also concerned about the provision of dental practices, as it is a very difficult situation already locally. This does not appear to be considered at all.

Environment

We are absolutely devastated and stunned that a major greenfield development is being considered in the setting of the local countryside. Surely as we discover more about the damage humans are doing to the planet, it does not make sense to further erode the local countryside.

The plan does not consider the current enjoyment and health benefits to the local community of the open countryside and the benefits for local wildlife.

One of the reasons my family and I moved to the area in 2013 was to enjoy the local countryside more and improve our quality of life. We have already created many happy memories, and have been very grateful for what we have, as we have local family and friends nearby, walks and to enjoy the treasure trove of footpaths.

My family and I feel extremely strongly about this point and feel much more must be done to investigate alternative locations to avoid damage the local countryside beyond repair.

It appears completely absurd to me that the SP17 policy can state that there will be an overall positive impact on sustainability. This is a complete misunderstanding and ignorance of how beautiful and impactful the local area we already have is.

Education

There is no coherent plan for education, and this very simply put makes the plan untenable. As a local resident, I am already concerned that the school has already been expanded into a very large school, and I am broadly concerned too that without understanding what is going on and making traffic predictions.

West Berkshire Council, as an education authority, has a duty to plan for suitable school provision. How this obligation will be met across all school years is not defined or evidenced in the LPR.

Whilst we both have experience of education in the area through virtue of using the education services for our children, we are concerned in the management of schools due to being a Local Authority Governor. The current state of school premises and facilities are poor and poorly managed. Policies around Academies and Multi-Academy Trusts have eroded WBC's ability to provide a range of services to schools left as Local Authority schools. This further expansion will only make the situation worse, and we need to see further resources planned.

Sports fields

The objectives of WBC and the North-East Thatcham Development Consortium to provide sports fields have simply not been met as they have not provided evidence for funding or for a suitable location.

Timing on the LPR

	<p>On 6th December, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement (https://questions-statements.parliament.uk/writtenstatements/detail/2022-12-06-1) stating that the housing number should now be an advisory starting point and not mandatory.</p> <p>The statement went on to say that the Planning Inspectorate should no longer override sensible local decision making local constraints and concerns.</p> <p>There is no evidence that this change of direction has been considered in the LPR in its current form.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Anderson, Dave
<p>Consultee Full Name</p>	Dave Anderson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS140
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	19/02/2023 13:54:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to object to the development of the land surrounding Thatcham as shown in the LPR. Specifically the land north of the A4 and along Floral Way. The local infrastructure simply can not support this development. Doctors, Schools, Roads etc are not capable of taking current legal objections by WBC to the development of land adjacent to this plot - and the reasons for the objection a
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dalgarno, Diane
Consultee Full Name	Diane Dalgarno
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS144
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	19/02/2023 14:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am against the development because of the detrimental environmental impact it will have on Bucklebury Common as a site. Bucklebury Common has many legally protected species including ground nesting birds. Even a proportion of the trees and their dogs who will come onto the common will cause significant disturbance and damage as happened during the previous development.</p> <p>The green sites on the proposed development will not satisfy the demand for green space by all the inhabitants of the parish by yourselves with the complete lack of strategy documents.</p> <p>The flagrant carelessness displayed in the consultation document for the environment are at best vague and at worst misleading. A Council supposedly working for the people are prepared to accept this destruction of their local environment.</p> <p>Leading on from this there is the dramatic increase in traffic which will inevitably pass up Harts Hill, onto Broad Lane and the surrounding small 'quiet' lanes. Cycling or walking is already hazardous in these lanes and will become impossible as traffic increases. Another environmental issue which surely cannot be ignored. The consultation document actually admits this is inevitable.</p> <p>From reading the local newspapers there is already sewage being dumped into the Kennet and Avon canal suggesting that the water and sewage systems are overloaded. Unless there is a huge investment by Thames Water to address this the issue which must be given urgent consideration. It is beyond belief that this hasn't already been done.</p> <p>I worked for <Personal details removed> for 20 years and know they are already stretched to capacity as are the Burtons. They haven't the capacity to take on another 4000 patients and would not want to open a branch surgery with all the staff and skilled professionals required. The NHS is so short of doctors, midwives, health visitors, nurses, social service professionals. How will the inhabitants get medical and mental health cover? How will current population numbers be served by the increase on the number of resources? This issue has not been addressed at all. How uncaring is that?</p> <p>Kennet School is at capacity. How do you propose to meet your obligations in providing an education for all the children in the development? Again, a definite promise of educational facilities for all ages is a failure by the Council.</p> <p>The whole plan is unsound and based on something paid for by developers who have nothing but financial gain in mind. The Levelling Up Housing and Communities has had the sense to back down on the number of houses needing to be built.</p> <p>I am deeply disappointed that a Council whose job it is to care for their electors whom they are supposed to represent show such callousness and disdain.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

<p>submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beckett, Allistair
Consultee Full Name	Allistair Beckett
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS184
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	22/02/2023 11:59:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p>	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I totally object to the proposed development at Bucklebury on the following grounds :- * This is a proposed development on a Greenfield site adjacent to an AONB *The increased traffic through Upper Bucklebury will be totally un- acceptable *Damage to the Common - the increased footfall will be severley damaging to a delicate Ecosystem of National impo This development must not go ahead !
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brown, Susan
Consultee Full Name	Susan Brown
Consultee Organisation	

Agent Full Name	
Agent Organisation	
Comment ID	PS188
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 21:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>I have lived in Upper Bucklebury for the last 26 years. During that time I have seen house numbers increase, placing existing inadequate education and health care facilities, but nothing like that proposed by the NE Thatcham development ill thought through and is totally unsound.</p> <p>I strongly oppose the NE Thatcham development on the following grounds:</p> <p>1 Traffic</p> <p>In the years that I have lived on Burdens Heath the traffic volumes have increased significantly. It travels at speed, on a stretch of road where there is no pavement or street lighting, making it unsafe for pedestrians and cyclists. This development increases the volume of traffic including along Harts Hill Road, which is a particularly unsafe and windy stretch of road where the increased traffic volumes will pose yet further threat to the safety of pedestrians, cyclists and motorists.</p> <p>I understand that there has been no modelling for the proposed junction on Harts Hill Road. I can only imagine because it is inherently dangerous. You don't really need a traffic assessment to work that out.</p> <p>I also gather that a car park is proposed on Harts Hill. It is unclear why one would be needed and this will simply be an encouragement of social behaviour that already goes on in the car parks on Bucklebury Common.</p> <p>The Council's assessment that the development will reduce accidents and improve safety as well as increase opportunities for public transport (which is pretty much non-existent in Upper Bucklebury) is totally ludicrous and without any basis or evidence. The opposite is likely to be true given the current problems with traffic volumes, which would be dramatically worsened.</p> <p>1 Healthcare</p> <p>The NHS is in crisis and unable to provide adequate primary care to those already living in the area. The development will increase the number of people and there is no coherent plan as to how and where the health care needs of those living on the proposed development will have their primary care needs met. In turn there will be increased pressures on hospital services which are similarly overstretched. A realistic prospect of a new GP practice being established and no financially viable prospect of one of the existing GP practices being able to take on surgery. Dental practices will be similarly unable to provide for the needs of those on the development. There is no evidence that any have been considered with local health care agencies or providers.</p> <p>1 Environment</p> <p>The site is a greenfield site and would therefore have an extremely detrimental impact on environmental sustainability. This negative impact on the environment will be managed and mitigated, if indeed that is remotely possible. There is no space on the development site. This development will simply increase traffic (people and vehicles) to Bucklebury Common and the fragile ecosystem of the Common requires. It presents a threat to legally protected wildlife on the site and in the surrounding area.</p> <p>1 Education</p> <p>How the children that the development will attract are to be educated is totally unclear. How will the Council fulfil its duty to provide education facilities for these children? The current schools in the area are mostly poorly funded with the buildings in poor condition and facilities lacking. How will creating further schools, if indeed that is what is planned, make a difference? It is clear that there is no secondary school provision. The number of pupils to be catered for is unclear making the financial viability of a school uncertain. Where the school would be located or indeed when it would be built, especially as it seems there isn't adequate funding to do so. It is clear to me that there has been no consideration given to the infrastructure necessary to support such a development and the extremely detrimental impact that the development will have not only on the lives of those living locally but also on the wider community. I would like to be notified of the progress of this matter.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brown, Julie
Consultee Full Name	Julie Brown
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS160
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 15:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	<p>I have lived in Thatcham for over 30 years and have seen many changes and i'm afraid not for the positive. I moved from a village where I had everything that someone would need for a much smaller community and wildlife and the ability to walk in the countryside. The population and we still have only one secondary school, No extra doctor surgery's or dentists and extra shops . The trains have been cancelled in Thatcham, if the level crossing is down you can sit for at least 45 mins ! (no bridge and no bus) .</p> <p>So far the infrastructure hasn't grown with the population , and the roads currently struggle with the traffic and I don't like sitting in the traffic to get anywhere in the mornings !</p> <p>My home will be opposite this new development and currently sitting in the garden is not a pleasure due to the noise from the road .</p> <p>Building more homes is not the way to go as I'm sure they will not be affordable for the younger generations either as they could support a mortgage .</p>
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Renfrew, Kerry
Consultee Full Name	Kerry Renfrew
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS165

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	19/02/2023 15:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>I am writing to object to the LPR Regulation 19 as I find it unsound due to the following reasons:</p> <p>Increased traffic</p> <ul style="list-style-type: none"> If this site goes ahead with a minimum of 1500 new homes being built, it will result in increased traffic flow in Thatcham and Cold Ash. Traffic flow is believed to exit onto Floral Way and the A4. I live <personal details removed>. At b

5 minutes to turn right to head towards Harts Hill Road. We believe that this development will negatively impact Floral Way, and traffic backing up in Foxglove Way waiting to turn onto Floral Way.

- Alternatively, cars will divert through the estate rather to exit onto Floral Way at the other end of Foxglove Way causing Foxglove Way to become a “rat run” and potentially dangerous for children and pedestrians in a residential area.
- At busy times, queues form on Floral Way for cars joining the A4 towards Reading. Queues can be backed up and only get worse if these homes are built on this land.
- If traffic leaves the site onto Harts Hill Road, it will head through the local villages on Chapel Row and Bucklebury, which will have to withstand the volume of traffic that will end up using them, and could lead to a serious accident.
- As there are no new jobs to be created in the area, a large number of people living on the estate will need to commute to work, which will increase traffic flow on already congested roads. For example, cars travelling towards Basingstoke or Greenham will have to can already face long waits with traffic queuing up Pipers Way and along Station Road.
- From a personal perspective, I commute into Reading by train. At times, it can be tricky to get parked unless you have a permit. What provision is being made to increase parking at the station? The station is not served by local buses from the area and therefore commuters either need to walk (from the Harts Hill Road junction this would be a 25 minute walk which is not feasible for all commuters) or drive, but without extra provision of car parking, this will mean existing commuters will have to We note that the Council's assessment is that there will be increased opportunities for walking, cycling and using public transport and Dunstan Park are not currently served with public transport; I'd like to question how the Council will ensure there are opportunities for walking, cycling and public transport.

Pollution / environment

- With the increased volume of traffic on the roads, this will lead to more air pollution. Living close to Floral Way, I expect air quality levels will rise in my area, and this will have a negative impact on me.
- The additional traffic going up and down Floral Way to access the new site will cause additional noise pollution both during the day and at night.
- Loss of open space used by walkers and the habitats of many wildlife being lost.
- With the loss of so much open space, the risk of flooding once again is increased. I understood from the Project's flood defence that the flood defence was built to protect the existing developments in Thatcham against a 1 in a 100 year flood. At the same time, that if new developments were built on this site that they would need their own flood defences. What are the Council expecting the current flood defences to be sufficient? A stream that flows into the flood defence and goes under the road in my garden. I am naturally concerned that if no plans are made for further flood defences, my property will at a high risk of flooding.

Healthcare

- The development plan proposes a primary healthcare facility for a GP surgery. Existing GPs in this area are unable to take on existing patient lists, so I would question how the planners expect to be able to open a new GP surgery. Getting a new GP is impossible at the current time; having 1500 more homes means this will become even more difficult, and puts a lot of extra pressure on the existing GPs.

Schools

- With the additional homes, the school provision in the area will need to be increased. There are no details in the plan for primary provision. Nurseries are already full and with waiting lists so provision has to be made before the houses are built.
- Secondary provision in the area is already limited with many children in Thatcham having their catchment schools in other areas. If homes on this site, unless more secondary places are made available, more Thatcham children will need to go to other schools. Children will need to go to The Downs, creating more traffic and pollution with children having to travel further to school.

Due to the many reasons listed above, I wish to object to the LPR Regulation 19.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reynolds, Deborah
Consultee Full Name	Deborah Reynolds
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS139
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 11:36:00
Attached Files	Deborah Reynolds Full response_Redacted.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	No

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>Extract of response relevant to consultation point:</i></p> <p>Environment</p> <ul style="list-style-type: none"> • Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively merge and lose its identity • Consequential damage to Bucklebury Common – increased footfall; increasing damage to an ecosystem of national importance • Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive impact and avoidance of harm • A 'Country park' – this has a specific accepted definition which is not met in this Plan. The three small, isolated areas of land on the boundary have no meaningful environmental value or commitment to exclude subsequent development <p>Education</p> <ul style="list-style-type: none"> • Unacceptable pressure on secondary schools – Kennet is already over-subscribed; accommodation for additional pupils has not been specifically stated <p>Transport</p> <ul style="list-style-type: none"> • A severe increase in traffic through Upper Bucklebury and other villages will be dangerous; WBC propose a new road to reduce traffic in and out of the northern end of the development, and a car park, also on Harts Hill, both highly inappropriate • Severe additional congestion on the A4 will be bad for citizens and business <p>Healthcare</p> <ul style="list-style-type: none"> • Unacceptable pressure on medical & complementary services – additional GP surgeries are not part of NHS strategy <p>Healthcare provision</p> <p>The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to refer the proposal to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is no detail or insight into strategic healthcare planning.</p> <p>Proposals for a major development that is likely to have a significant health impact in relation to its size and location, require a Health Impact Assessment (HIA) for purpose Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. The proposals to how the proposals for development have been discussed with health service providers regarding impacts on primary care. All development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the development. The impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that neither the public and private stakeholders respectively, appear to have arranged or published a prospective HIA specific to the Thatcham development.</p> <p>Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to address the requirements associated with new development. It is of concern that there appears to have been no direct engagement with the Thatcham Development Consortium and local general practices.</p> <p>Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand. Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is a shortage in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in the foreseeable future.</p> <p>GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable and to extend the range of services and primary healthcare professionals available on a single site. It would make no financial, clinical or staffing sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional costs and encumbrance working across two sites.</p> <p>There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the village to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. The proposal, with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2021.</p> <p>The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Moor (Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are currently run by two Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 2700 patients under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on services as there are more young children, a higher maternity workload, less local extended family support and there is initially a higher demand. Permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care services.</p> <p>Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of residents currently attending for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents</p>

dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the any local dental practices regarding the potential impact of increased workload resulting from additional housing.

Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at the health centre.

Conclusion:

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having approached health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and to mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope. The objective of WBC Development Consortium to improve access to the health service component of community infrastructure has not been met. **evidence for the provision of a viable primary care medical facility.**

Transport

1. Increased Traffic

Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a recurring theme is the villages. We sought assurances and were led to understand by WBC planners that traffic from the development would be managed. A4. This is true but what they 'forgot' to mention was **a plan for an exit at the north of the site onto Harts Hill**. This was mentioned on 6th January when the Transport assessment was published: Phase_2_Transport_Assessment_Report_July_2021.pdf

This is serious for us because traffic from, or to, the site is only going to go in one direction from this exit – **towards the villages** split between the traffic going through Cold Ash and the traffic through Upper Bucklebury and Chapel Row.

The proposed development will funnel traffic from the development and, **WBC predicts, - 'some displacement of traffic such as Upper Bucklebury'**. This would be where the roads are inadequate, without pavements and have the potential for accidents. Also point 4 below on increasing opportunities for walking and cycling – under 'Safe' Transport.

2. Access and junctions

The Transport Assessment says at paragraph 3.26: 'The access arrangements for the northern end of the NET site proposed (including right turn lanes where appropriate) on both Floral Way and **Harts Hill Road**. Results from the modelling suggest that the access is not safe. However, the document has **no** modelling results for this. There are drawings for all the other proposed junctions but not for Harts Hill Road?'

3. Car Parks

We have also seen drawings showing **a new car park on Harts Hill**. The purpose is a mystery but will surely add more cars to an already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park.

4. Safe and Sustainable Transport

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Plan for North East Thatcham against key Sustainability Objectives.

Objective 4 is – To promote and maximise opportunities for all forms of safe and sustainable transport. The SEA makes the following points:

- 'To Reduce Accidents and Improve Safety'

Council Assessment - The policy is likely to have a Positive Impact on road safety as safe travel will be critical to the success of the plan.

- 'To increase opportunities for walking, cycling and use of public transport'

Council Assessment – Significant **Positive Impact**

Council Commentary - The policy is likely to have a significant impact on walking, cycling and public transport as the plan aims to improve these with these in mind.

Specific Objection: Education - Schools and Sports Field Provision

1 Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Plan. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to assess the impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are **no details** in the LPR of the provision for **Nursery or Early Years** education. Policy SP17 NE Thatcham Strategic Growth Study states that 'the site will provide Early Years provision'.

The provision for **Primary** school education is **unclear and contradictory**. There is no data or evidence on the plan for primary school entry requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. As no data available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state how many school place provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The **current situation** for secondary school students from Bucklebury is that they have a choice of either The Downs or Bucklebury are in the catchment area for both.

Where schools are **oversubscribed** those children who live nearer to the school are given precedence. This means that those from NE Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is **inconsistent, incomplete and contradictory** on the provision of **secondary schooling** in and around Thatcham. This is a contradiction to the *Supporting documentation. It proposes that the sum of £15 million be contributed by the developers to secondary education. There are **no details of the location of the land** to be provided and hence no possibility of assessing its suitability.

Please see the link below to **The Thatcham NE Development Plan 2020** (part of the LPR *Supporting documentation).

<https://www.westberks.gov.uk/media/49799/Thatcham-Strategic-Growth-Study-Stage-3-Thatcham-Future/pdf/>

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposed a 6FE (Form Entry) secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the **NE Thatcham development** (which proposed 2,500 houses), **is not sustainable**. Specifically :-

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The provision proposed is **not sufficient** on its own to fill a 6-8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. **Smaller schools are not considered feasible for a new school to be smaller than 6FE.**

With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school is **not sustainable** in this location.

Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on a **study in 2011**. Clearly the use of 11 year old data is inadequate. The Development Plan states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary school demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably education provision will be considered in more detail as any development comes forward.

The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for a secondary school.

In summary, it is therefore clear that the plan for secondary school provision is 'unsound':

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Conclusion on Schooling:

West Berkshire Council, as an education authority, has a duty to make arrangements for **suitable school provision** across all school years is **not defined or evidenced in the LPR**.

2. Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the road, and is the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If not, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public for other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide **sports fields has not been evidenced in the LPR**.

Specific Objections: Environmental Issues

There are a number of **serious environmental threats** posed by the proposed Thatcham North-East strategic development:

- 1 **Collateral damage** to the **Bucklebury Plateau Biodiversity Opportunity Area** (*see map at end) [in attachment] and heaths, **in particular the Common**;
- 2 Siting a **major greenfield development** in the broader landscape setting of the **North Wessex Downs AONB**, which will impact on the **character** of the open countryside by local communities;
- 3 Causing **detrimental impacts to legally protected wildlife** known to be present on the site, whilst erroneously claiming that measures can be taken after development e.g. through the vague promise of a 'community park'.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the development, **there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there will be a significantly negative impact.**

For example, the WBC states in the LPR that a **Sustainability Charter is required** to establish how 'policy requirements for the development will be met, including the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability) will be informed by' various strategy documents (including one on ecology). **Yet, the strategy documents either do not exist or are not publicly available for the Regulation 19 consultation.**

At least **4,000 people will be concentrated in the development site**. They of course must have access to green space for their wellbeing. The claimed provisions for green space cannot satisfy this demand on site. The original Thatcham Growth Strategy proposed **two 'country parks'** spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming the potential for biodiversity enhancement over its current land use. No details were provided about how they would be formed. The feasibility study showed the complete lack of preparation for such country parks, not least that they should be merged, and properly managed to provide that stated biodiversity enhancement. Now, in the updated SP17 text, the country parks have been **downgraded to uncultivated grassland**, which only proves how little commitment WBC has given to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will be a negative impact on visiting adjacent areas.

Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green space which will 'take advantage of the landscape' to '*facilitate connection to the AONB, and include leisure routes accessible to the public*'.

Meanwhile, the management vision for Bucklebury Common is explicitly focused on **not** increasing human pressure on the site, but working to restore and nurture.

In fact, **the LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability** on a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated by whatever whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the p

	<p>However, the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact (largely by absurdly ignoring the environmental consequences in favour of social and economic benefits that are any number of the articles herein).</p> <p>The overall thrust of the SP17 policy is clearly to build as many houses as possible in a small area of countryside, with little regard for how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on consultation plans and justify the ‘growth’ requirement, there is no evidence of any serious attempt to investigate, analyse and report on the consequences. Everything will be all right because their own unsubstantiated policies say it will be.</p> <p><i>For full response see attachment Deborah Reynolds Full Consultation Response. For map referenced see last page.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hadley, Robert
Consultee Full Name	Robert Hadley
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS143
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	19/02/2023 14:15:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to complain in the strongest terms possible about the proposed housing development along the A4 east of Thatcham and along the A4 to coxs lane. This development will concrete over acres and acres of prime farmland at all the farmland it can get to feed a population that is growing faster and faster. All new homes should be built on brownfield sites. Berkshire has had more than its fair share of housing development in the last 40years since I moved to the area Thatcham a lovely place in the 1970s when I often came out this way for a day out but has been turned into one gigantic housing development. If it was allowed it will leave virtually no green land between Thatcham and midgham just as all the green land between Newbury and Reading has been built upon. More houses means more people meaning more pollution and congestion, most of these houses will exacerbate an already overloaded road system 2500 houses equal at least 5000 more vehicles plus more home deliveries. Many of the council are already incapable of keeping in good repair. Country lanes will be used as rat runs to try and avoid the main roads. I get onto even at non peak times, sometimes it can take an eternity to turn right out of local country lanes which inevitably will eventually cause accidents.</p> <p>There is an abundance of wildlife that will be affected by this development you can often see hares and roe deer on the roads and in the last few years we have noticed lapwings which we had never seen before in this area there are also badgers and smaller birds which will be driven out plus of course many species of butterfly some of which will be native to just this area and country lanes are all used by horse riders and dog walkers and those just out for a country stroll all will be inconvenienced by an increase in traffic. Where are all these new residents going to go when they need to see a doctor or dentist where are their children going to school no doubt they will just be loaded onto already hard pushed schools and surgery's.</p> <p>On a more personal note it surely cannot have escaped your attention that the majority of people in this county are leaving and the question is for how much longer can you count on their support???</p>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Romaine, Charles
<p>Consultee Full Name</p>	Charles Romaine
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS187
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	22/02/2023 17:08:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Timing of the Local Plan Review Consultation</p> <p>On 6 December 2022, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Statement (https://questions-statements.parliament.uk/writtenstatements/detail/2022-12-06/hcws415) detailing that the housing requirement in the Local Plan is a starting point and not mandatory. The statement went on to say that the Planning Inspectorate should no longer overrule local plans which is sensitive to and reflects local constraints and concerns.</p> <p>The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March, 2023. The Consultation states that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the Local Plan) is not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation on the character of an area when assessing how much housing can be accommodated. On the back of this announcement, the council has paused their plan making process whilst they await the outcome of the consultation on the basis that a lower housing requirement would be in the interests of the plans than the one currently being planned for. I believe that the council should take the opportunity, as others have done, and to bring forward a revised plan in line with updated planning guidance when this comes in later in 2023.</p> <p>Transport</p> <p>I am concerned as to the increased traffic through the villages of Upper Bucklebury, Chapel Row and Bradfield South that would result from the proposed significant development. I understand that there is a plan for an exit at the end of the road. This would be where the roads are inadequate, without pavements and have the potential for serious accidents.</p> <p>The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Plan consultation is in breach of North East Thatcham against key Sustainability Objectives:</p> <p>Objective 4 is – To promote and maximise opportunities for all forms of safe and sustainable transport. The SEA makes a recommendation 'To Reduce Accidents and Improve Safety' Council Assessment - The policy is likely to have a Positive Impact on road safety. 'To increase opportunities for walking, cycling and use of public transport' Council Assessment - The policy is likely to have a significant impact on walking, cycling and public transport. The Local Plan is designed with these in mind.</p> <p>I question both of these council assessments, which seem to me to be self-evidently incorrect with regard to this proposal and the surrounding road infrastructure.</p> <p>Healthcare</p> <p>The North-East Thatcham development plan (SP17) proposes a 450 square metre primary healthcare facility with the intention that it will be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. There is a bereft of detail or insight into strategic healthcare planning.</p>

Proposals for a major development that is likely to have a significant health impact in relation to its size and location, for purpose Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. To how the proposals for development have been discussed with health service providers regarding impacts on primary care.

West Berkshire Council Local Plan Review Regulation 19 Objection
Representations relating to the proposed significant development in North East Thatcham

The development proposals should demonstrate how the conclusions of the HIA have been considered in the design. An unacceptable impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, appear to have an HIA specific to the proposed North-East Thatcham development. Tackling health and wellbeing requires a multi-agency approach. The Health and Wellbeing Strategy 2017-2020 2021-2030, has been developed by the Reading, West Berkshire and Wokingham Health Boards together with the Berkshire West Integrated Care Partnership. Developers are encouraged to engage with the Health Board at the earliest opportunity in order to determine the health care requirements associated with new development. It is of concern that there appears to have been no direct engagement between the North-East Thatcham Development Consortium and local GP practices. Few new GP practices are commissioned by NHS England, even where they consider there to be patient need. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm a shortage of GPs in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or West Berkshire in the future. The aim is to look to create efficiencies and economies of scale to make general practice more financially sustainable and to increase the number of services and primary healthcare professionals available on a single site. It would make no financial, organisational or clinical sense for a local GP practice to set up a branch surgery on the proposed new development because of the additional administration and encumbrance working across two sites. There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor space or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the centre of the town to access and minimise traffic as the proposed North East Thatcham development is peripheral to the centre of the population. The site is supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. Local practices did not have input with the inadequate 450 square metre floor size proposal which they only discovered in the Sustainability Appraisal 2022, Appendix D. The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Mill (East of Harts Hill Road), Burdwood Surgery (East of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are currently run by Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 27,800 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on GP services because of a higher maternity workload, less local extended family support and there is initially a higher housing turnover. One permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care. Private dental practices are unable to provide dental care for the whole population with a significant minority of patients needing to travel to private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have approached any local dental practices regarding the potential workload resulting from additional housing. Reviewing the scant healthcare recommendations within the Thatcham Sustainability Appraisal 2022, Appendix D.

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(David Lock and Associates) - Stage 2: Thatcham Present, paragraph 4.10 states: 'A dialogue with the relevant health care agencies should be established early in the master planning process to address concerns that social infrastructure may not be able to cope with the future report published in September 2020 includes no further detail except the outcome of a community representation that GP facilities are at capacity and suggesting a new health centre. In summary, WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having consulted with health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and will not mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope. The objective of the Development Consortium to improve access to the health service component of community infrastructure has not been met. There is no evidence for the provision of a viable primary care medical facility.

Environment
This is summarised into three main areas:

1. Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands and heaths
2. Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB that will impact on the open countryside by local communities;
3. Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient mitigation can be taken after development e.g. through the vague promise of a 'community park'.

A professional review on behalf of Bucklebury Parish Council of the background documentation provided by WBC in support of the development shows that there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is every reason to believe it will have a significantly negative impact. For example, the WBC Sustainability Appraisal Charter is required to establish how 'policy requirements will be achieved' (including the legally required biodiversity objectives and overall positive impact on environmental sustainability). It maintains that the Charter 'will be informed by' various strategies (including on ecology). Yet, the strategy documents either do not exist or have not been made publicly available for the Regulation 19 process. Bucklebury Parish Council estimates that at least 4,000 people will be concentrated in the development site. They are proposing a space for recreation and general wellbeing. I do not believe that the claimed provisions for green space will satisfy the requirements. The original Thatcham Growth Plan had a vague proposal for two 'country parks' spaced across the top of the slope, in the Bucklebury Plateau Area, claiming the potential for significant biodiversity enhancement over its current land use. No details were provided. Bucklebury Parish Council's own feasibility study showed the complete lack of preparation for such country parks, not only in terms of and properly managed and funded to deliver that stated biodiversity enhancement. Now, in the updated SP17 text, the proposals have been downgraded to undefined 'community parks' which only proves how little commitment WBC has given to protecting the environment and the enjoyment of it. Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be a negative impact on adjacent areas. Indeed, the LPR states its intent to provide a high quality environment.

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for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green infrastructure network which will to 'facilitate connection to the AONB, and include leisure routes accessible to all users.'

Meanwhile, the management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the site, working to restore and nurture. In fact, the LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on sustainability: 'The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability, which will be mitigated.' But there is no detail whatsoever on any such mitigation measures: the assumption is simply that they will be considered in the planning application process.

However, the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact on the environment, absurdly ignoring the environmental consequences in favour of social and economic benefits that are anyway highly likely to be realized. The overall thrust of the SP17 policy is clearly to build as many houses as possible in a small area of countryside, without regard to how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on commissioning plans and justify the 'growth' requirement, there is no evidence of any serious attempt to investigate, analyse and systemically test the assumptions. Everything will be all right because their own unsubstantiated policies say it will be.

Education - Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for all children. Without this provision, the Plan for a large new housing development is untenable. The lack of a coherent Plan on Schools for the proposed developments also means that it is impossible to estimate the subsequent impact on traffic. The siting of a secondary school East of Thatcham would result in a significant increase in traffic across the whole Thatcham area, not considered in the LPR.

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 North East Thatcham merely states that 'the site will provide Early Years provision'. The provision for Primary school education is unclear and there is no evidence on the planned numbers of schools or Form Entry requirements. The LPR proposes that the sum of £12 million be made available to developers to primary education. However, with no recent data available (the only data referenced is from 2011), it is unclear if this is sufficient.

It also does not state the timing of this funding or school place provision. Clearly, schools need to be available before the start of the school year. The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs or Kennet are in the catchment area for both. Where schools are oversubscribed those children who live nearer to the school are given priority so that children from the proposed North East Thatcham development would be able to opt for Kennet and those from Bucklebury to The Downs. The LPR is inconsistent, incomplete and contradictory on the provision of secondary schooling in and around Thatcham, which is in contradiction to the *Supporting documentation. It proposes that the sum of £15 million be contributed by the developer to fund a new West Berkshire Council Local Plan Review Regulation 19 Objection

Representations relating to the proposed significant development in North East Thatcham

The Thatcham North East development plan 2020, produced by David Locke Associates and Stantec on behalf of West Berkshire Council (Form Entry) secondary school, half-funded by developer contribution. Government guidelines are that Secondary Schools should be not sustainable. However, the Development Plan states that the North East Thatcham development (which proposed to fill a 6–8 FE school: Specifically :- 5.18 Provision of a new secondary school in North East Thatcham is an essential part of the town. However, the scale of growth proposed is not sufficient on its own to fill a 6-8FE secondary school. Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities for the growing population. It is not feasible for a new school to be smaller than 6FE. With an apparent 40% reduction in the housing allocation in the 2020-2039 period, houses, a secondary school simply cannot be sustainable in this location. Earlier in this same Thatcham North East Development Plan that the education provision exercise was based on WBDC data on pupil yield from a study in 2011. Clearly, the use of eleven year old data is inadequate.

The Development Plan states: 4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to assess the long-term educational demand across the town, and has not attempted to predict the long-term capacities of existing schools. The provision will be examined in more detail as any development comes forward. The LPR Review to 2039, Policy SP17 (Secondary school itself) will be provided for the development.

In summary, it is therefore clear that the plan for secondary school provision is 'unsound' :

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. Funding for a school across all school years is not defined or evidenced in the LPR.

Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the A4 road, most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If not, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public for other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide sports fields has not been met. There is no evidence for funding or for a suitable location.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Billington, Tony
Consultee Full Name	Tony Billington
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS191
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 22:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to record my objections to the WBC LPR Regulation. I believe the plan to be unsound for the following reasons.</p> <ol style="list-style-type: none"> 1. The number of houses planned is too great for the existing and planned infrastructure. 2. The level of increased traffic will be very substantial and in particular will impact Upper Bucklebury. I live on Carbin and the level of hour traffic has increased considerably in recent years. Extra traffic will increase the danger particularly to cyclists and children on this country lane. 3. The evidence for adequate provision of increased GP and Dentistry services has not been demonstrated. 4. The proposed development will have a negative impact on the environment. In particular the fragile ecosystem of the area will not support the likely increase of footfall. 5. The plan for schooling is vague and lacking in detail and thus unsound.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Page, Jonathan
Consultee Full Name	Jonathan Page
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS164
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	19/02/2023 15:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	No

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>I object to the plan as I find it unsound in relation to the Thatcham NE Development</p> <p>I do not believe Thatcham has the capacity to absorb a further 1500 houses (minimum). 2021 Census show population compared to Newbury's 33,841.</p> <p>Large scale developments are more difficult to deliver as illustrated by the delays at Sandford Park.</p> <p>Education</p> <p>I believe Newbury has three secondary schools to Thatcham's one, Newbury has ten primary schools to Thatcham's not just bricks and mortar they have to be staffed and established, more pressure on budgets and teacher shortages for the children of Thatcham</p> <p>Healthcare</p> <p>Thatcham has two doctors' surgeries to Newbury's three and there is no realistic prospect of a new GP practice being opened in Berkshire.</p> <p>Kennet Primary Care confirms that there is no plan in place to manage structural changes that would need to occur for this development. This development will not help struggling Primary Care provision in Thatcham.</p> <p>You would have to conclude that Newbury is far better placed to absorb large scale developments than Thatcham with the site at Donnington adjacent to Vodafone HQ, or even Grazeley Reading.</p> <p>In relation to topography of the proposed NE Development, it will not easily reduce car use and aid use of public transport. Impacts on the environment and green spaces between Thatcham and Upper Bucklebury.</p> <p>My fear is if it does go ahead we will see unrealistic promises from developers with underfunding by the authorities, and we will have to live with the consequences.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brand, Angela
Consultee Full Name	Angela Brand
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS168
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 16:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The proposal to build 2.500 houses in NE Thatcham will devastate and destroy the whole area, If this development is allowed to proceed, there will be far too many people, vehicles, houses, li pollution, traffic jams, wildlife deaths and noise pollution to an area already suffering from an ov problems. The area will be suffocated by these problems if this development is allowed to pr infrastructure will not enhance the project and area either.</p> <p>The addition of 2,500 houses, promised services and schools, (the size of Hungerford town) c area together with all the additional problems will overload the town of Thatcham and will destro with further loss of wildlife habitats to already threatened species. There are already far too n on the roads. I see this almost daily. This proposed development and its results is totally un and avoidable.</p> <p>There have been and are currently too many housing developments in the local area which a fundamental nature and character of the historic town of Thatcham and its surrounding areas built in recent years is enough and in line with housing requirements. There is little if any nee and no evidence to support this catastrophic ill thought out 'plan'.</p> <p>With the current lack of green space, services and road/rail infrastructure, Thatcham and surro destroyed if this project is allowed to proceed. Furthermore, it is my understanding that in the p in housing development projects have not been delivered and the use of community buildings h concern for residents. Therefore, how can residents be expected to trust that this council has and it's residents in mind?</p> <p>In conclusion, this proposed development will squash the life out of this beautiful area for the</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Marriott, Lesley

Consultee Full Name	Lesley Marriott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS172
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 16:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	I am strongly objecting to this proposed plan as I believe it to be unsound due to the reasons below: <ul style="list-style-type: none"> • Environmentally unsound • Insufficient infrastructure • Added pressure on already stretched GP and schools services On a personal note, I live at <personal details removed> and this would have a very personal impact as the new development opposite my property and would completely change my current outlook and make pulling out of my road even more difficult.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lovell, Elaine
Consultee Full Name	Elaine Lovell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS182
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/02/2023 16:24:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I wish to strongly OBJECT to the building of an unnecessarily large number of houses on what is currently open space Upper Bucklebury and Thatcham.</p> <ul style="list-style-type: none"> • Thatcham has already grown beyond its sustainable limits, the open ended “at least 1500” new homes will leave the area in houses as developers wish to add. The more housing is crammed in, the more neighbourhood arguments will happen somewhere people want to live for along time, not tolerate until they can get something better, which this appears it will be. • Traffic in the area is already at a standstill around school times, with no senior school proposed for the site more children from outlying areas. More people will be trying to get to Newbury for work. Despite what the council want, public transport is not working for workers. • The dark skies of Upper Bucklebury are a treasure that should not be lost. The “Aurora Thatcham” is already a sulphur sky which thousands more street lights, even the less light polluting ones will just add to. • A small collection of trees is not a “country park” no matter how much marketing speak is applied to said trees, they will be lost from the open landscape. • If a roundabout onto Harts Hill road from the oversized development goes ahead. The road from Upper Bucklebury will become into a council made rat run to the M4. • Did the models for traffic, flooding and ecological impact account for homeowners adding in such things as plastic grass where their front garden used to be? Or using their cars for quick runs into Thatcham to get the shopping or takeaway? What percentage of housing extending with glass roofed buildings to add to the light pollution and again adding more solid roofs to the fields. <p>I see no benefit to the area for this mess of “shove them in and pack them tight” housing.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Butcher, Liz
Consultee Full Name	Liz Butcher
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS213
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 12:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>There will be increased traffic through Upper Bucklebury and Chapel Row and a problem at the junction on the Pangb proposed a new roundabout on the narrow Harts Hill road to allow traffic in and out of the northern end of the develop Harts Hill; this will cause additional congestion on the A4. Cold Ash will see a large flow of traffic going towards Chie narrow and many do not have pavements; cycling would not be safe.</p> <p>There is insufficient capacity at Kennet school (oversubscribed) and no other plan has been made. School provision l and facilities on such a gradient have not been costed.</p> <p>On Wildlife: Bucklebury common would be subjected to an increased number of visitors and the delicate ecosystem v There is no evidence of or any strategy for increased biodiversity. A "country park" mentioned in the plan does not m the three small areas inside the settlement boundary are not of any proper environmental value, some "wildflower m nightjars or great crested newts.</p> <p>The strategic gap between Thatcham and Bucklebury; Upper Bucklebury will lose its identity when Thatcham and B developer in Cold Ash has just been refused permission for this reason.</p> <p>Medical provision: additional GP surgeries are not part of the NHS strategy for the future. No local surgeries have th surgery of 450 square metres as suggested.</p> <p>Number of houses: Initially 2500 houses were to be built in total, 1250 in the plan period. This has now been increa Any mitigation of the impact of the development should be largely completed before sales however what normally hap poverty and delays this work until the site is largely complete. The developer will wish to utilise the area originally de 1000 after this LPR plan period finishes.</p> <p>This LPR is unsound for the reasons stated above.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Coulson, V E
Consultee Full Name	Mrs V E Coulson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS230
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 17:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object in the strongest terms to the proposed plan above as I find it unsound. Some of my objections are de</p> <p>1. The proposed development is situated on the side of a valley in the broader landscape setting of the North Wessex settlement boundary in an area of greenbelt land consisting of rolling hills and farmland. The development would be of viewpoints, most notably from the southern side of the valley and would change the overall vision of the area to a small town contained within a wider countryside context. Contrary to claims within SP17 that this will have a positive believe that it will have a significant and irreversible negative impact.</p> <p>2. If the proposed development were to proceed the gap between it and the village of Upper Bucklebury and the bou negligible and insufficient. Upper Bucklebury would effectively join Thatcham thereby losing its identity and seriously compromising the rural as At the time of the AONB boundary being set it had to meet several criteria set by Government. Several of these, inc and wildness would be completely compromised if the existing 'buffer zone' was eroded.</p> <p>3. It is of particular concern that SP17 has no proven plans for providing adequate green space and protecting biodi intent for SP17 to drive additional traffic (people and cars) into the AONB. This is the absolute opposite of the manag Common which is explicitly focused on not increasing human pressure on the fragile ecosystems they are working to The LPR's own sustainability appraisal accepts that SP17 will have a negative impact on environmental sustainability b measures which would be taken. Ironically the same sustainability appraisal suggests that the SP 17 policy is likely to have an overall positive impact on all the environmental consequences in favour of some highly questionable social and economic benefits. Given the i sustainability appraisal one has to question whether it has any credibility whatsoever and ask whether the whole app more competent body.</p> <p>4. Bucklebury Vision and the Bucklebury Plan are documents approved and agreed with West Berks Council. Despite th 'supplementary planning consideration' they do not appear to have been taken into consideration. The section within Bucklebury Vision, Highways, Communication and Traffic is particularly relevant. <i>The parish roads have been established over the years for access, service and communication between the numerous l consist entirely of unclassified roads (rural roads), mostly without pavements or kerbstones, upgraded from gravel tra structure. The 14 miles of tarmac lanes - all single carriageway or single track, with few passing places, are generall with hedgerows or soft verge edges, many subject to flooding and only really suitable for local traffic.</i></p>

	<p>1500 - 2500 extra properties would result in a large volume of extra traffic not just on all of the main roads but also the surrounding villages. WBC documentation does not address this. Country lanes are known to be the most dangerous roads that any increase in traffic is going to make them even more hazardous for motorists and non-motorists alike. This is addressed in the Transport Plan 2011 - 2026 'Active Travel Strategy' and more especially with the Bucklebury Quiet Lane Scheme which is supported by local residents.</p> <p>The issue of the inevitable increase of traffic on the wider network of country roads and the need to look at road safety is addressed in SP17.</p> <p>5. I have a particular concern with the traffic that will travel up Harts Hill and into Upper Bucklebury. Since the introduction of the chicanes in Broad Lane, Upper Bucklebury there has been a significant increase in traffic on the single carriageway country lane with no pavement and with a dangerous 90 degree bend, as a means of avoiding the chicanes in Broad Lane at busy times of the day. Residents have tried to protect verges from being driven over by using markers in an attempt to keep vehicles on the actual road. Any further increase in road movements in the area would have a serious impact both for motorists and for pedestrians. Ironically Byles Green is part of the WBC Quiet Lane Scheme.</p> <p>SP17 does not address this nor am I aware of any assessment having been carried out.</p> <p>6. The proposed site for Thatcham NE Development and Bucklebury Common is home to many species of wildlife and some are increasingly rare. I find it abhorrent that there is no plan to protect our rapidly decreasing and increasingly precious wildlife to mitigation measures that would be taken after the development has been completed. It is environmentally irresponsible far as I am aware there have been no strategy documents relating to the ecology of the site published by WBC. If there is any attach to ecology I can take no reassurance from promises of mitigation!</p> <p>In addition there is already a problem with off-roading, litter and fly tipping and any increase in motor vehicles on the site is a 'playground' rather than a place for quiet enjoyment and appreciation will be to the detriment of its fragile ecosystem.</p> <p>7. I have limited my comments to some of the impacts of the proposed development on Upper Bucklebury where I live. The impacts are also huge and damaging for that community. The proposal is over development of Thatcham which currently struggles. There is insufficient parking for the town and schools and doctors surgeries are over stretched. The railway station area with limited parking and almost full train services at peak times. Flooding is an on-going issue and building on the site will massively increase the risk of heavy rain overwhelming the drainage system to an even greater degree than occurred in Thatcham' report written by Sue Everett, an independent consultant ecologist, said that it would be "utter madness" to build in a climate change means that once 1 in 100 years events are happening far more frequently and it would be irresponsible to take a known risk.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Lloyd, Eric
Consultee Full Name	Eric Lloyd
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS120
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 19:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF.

* Yes

* No

Please give reasons for your answer

I am writing further with regard to the Local Plan Review as above on account of the apparent failure of the Council Government (re- think) planning guidance to avoid the provision of housing development on areas of greenfield/AONB required/earmarked by the Local Plan to be built over the plan period.

As a resident of Upper Bucklebury, I find it incomprehensible and deeply disturbing that a proposal such as above is to dump such a large provision of housing in this in-appropriate green-field location with the consequential and obvious not only on the residents of Thatcham itself but also on the neighbouring villages in the near and wider surrounding rural Natural Beauty

- Over the years, Thatcham has suffered from an ongoing and exponential expansion in housing development so indistinct suburb of Greater Reading with individual villages vanishing in a swamp of continuous ribbon development and Thatcham Relief Road (Floral Way) developments were granted planning consent, it was argued and understood that this road would become the boundary for any future Green Belt development northwards (once and for all). but this requirement(?) has been conveniently put aside.
- So much for previous promises!
- Now we are confronted with the development of 1500 houses just a few years later, thus setting a further precedent for 2,500 and exponentially who knows - another 1000 or more, as time moves on, as a convenient dumping ground.
- An Overwhelming Majority of residents do not wish to see **any** housing allocated to this site, which will destroy the character of this very special AONB area, being situated right next to Bucklebury Common.
- They are concerned at the wider adverse implications likely to result from an apparent planned over provision in the Local Plan, which puts pressure on the Council to unreasonably allocate development to greenfield land (not by Government) in a very sensitive area such as this.
- An escarpment of urban housing sprawl will emerge like a fan over this quiet rural part of AONB countryside – overdevelopment in any one location, let alone this one, planned over quiet farming land which neither warrants nor justifies housing development what-so-ever– pure vandalism, and which if proceeded with, on account of the steep gradient visible from the A4/Thatcham/Kennet valley area below and a permanent eye sore to perpetuity on this landscape – an unnecessary desecration of this beautiful part of rural West Berkshire.
- The Government has stated that it does not wish to see over-development in the south east, or on Green Field Land.
- The requirement for additional housing numbers contained within the West Berks Plan should be based on local based numbers game arbitrarily mandated allocation from central government, apparently now signalled.
- The Local Authority has a duty of care to concentrate the location of housing need on brown/ semi brown field less controversially sensitive **non** AONB locations. It would be arrogant, undemocratic and political suicide in the Local Authority to plough on with the current proposals, regardless, in the face of virtual 100% local opposition as currently the result of the Governments current dithering and changing/emerging policy advice on residential planning and a decision to allocate housing to this site in the first place.
- In view of the above, it is reported that many other Local Authorities are staying, amending or scrapping their plans from the Government on extending the plan period. In view of the re-think required in regard to the NE Thatcham the same and establish alternative locations for the perceived NE Thatcham allocation of their draft Plan. That is

Apart from this, Thatcham and its surrounding areas are unable to take any further such sized development in the context of its amenities.

The argument made for the construction of the Floral Way relief road was to take pressure off the A4 and Central Thatcham up-grading of this infrastructure likely to be required to provide for the increased traffic emanating from the proposed roundabout and Harts Hill Road round-about will be constantly grid locked.

Notwithstanding, as currently planned, that provision for access directly on to Floral Way from the proposed development on Harts Hill Road from the planned NE entrance to the development at the top of the hill will exacerbate the traffic congestion on this steep and windy road.

Any traffic survey undertaken must take account of the fact that Harts Hill Road has become an overflow shortcut for traffic from Upper Bucklebury/Southend Bradfield as well as to the A34/M4 via Cold Ash/Hermitage in order to avoid using the old

The build up of traffic using Broad Lane and the Avenue of Oaks has increasingly become a rat run, with vehicles travelling the edge of Bucklebury Common, creating serious danger to walkers and their dogs as well as cyclists, adjacent to the danger will be substantially increased by the vastly increased volume of vehicles emanating from the development s

Traffic build up and lack of parking facilities within the town centre are a major concern as existing, without the addition of additional vehicles from the proposed development.

The A4 can hardly handle the existing traffic flow around Thatcham as now, let alone being able to cope with this increased location.

The main Station carpark for Commuters is usually full at normal working times without any further parking provision entrance thereto squeezed alongside the Level Crossing making it almost impossible to manoeuvre around in the full stationary with the main road continually blocked when the gates are down to accommodate passing trains, This area can cope, thus creating a no go area in peak times. That is the current position. With the addition of a further 2,500 vehicles from the development as planned, the added pressure will render this area simply unable to cope.

At the same time, the build up of traffic at the Level Crossing (Bridge proposal seemingly now abandoned), gets worse and un-acceptable. With further trains and further traffic build up, it will be virtually impossible to cross from the north to the south in a reasonably timely manner on what is a crucial route south (despite what Town Planner David Lock has previously said is a time bomb, requiring serious resolution now.

All this is in addition to the adverse impact that the additional traffic generated from the proposal will have on wider local roads referred to above.

Regardless of the extraordinary decision to allocate housing as above to this location in the first place, neither the current nor their likely increase, seem to have been addressed in any comprehensible way in the proposed Plan – (? on the basis of the day!')

Unfortunately, it won't, on account of the many obvious unsolvable difficulties requiring resolution.

Before any further abortive and wasteful work is undertaken on the current Plan, a full detailed **third party** Infrastructure (transport, movement, healthcare, schools and environment)) across the relevant and outlying area affected, covering Thatcham and the A4 should be undertaken to assess the practical viability of the Plan proposals within the context of the current additional pressure resulting from the Plan proposals.

The proposals for NE Thatcham as set out in the local draft Plan should be scrapped.

Please register my personal objections to these proposals as contained in the West Berkshire Plan.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination

- * Yes
- * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Portsmouth, Barry
Consultee Full Name	Barry Portsmouth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS129
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	19/02/2023 10:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I am writing to object to the planned development in northeast Thatcham as I found this unsound. As a long term resident of Thatcham, I am concerned about this development for a variety of reasons:</p> <p>Local infrastructure</p> <p>My concern is that the local Thatcham infrastructure will be unable to cope with this development. The sewerage works will not cope with another 1500-2500 properties, so potentially another 4,000 people's waste! The local drainage system is already at capacity and our local park floods constantly in periods of heavy rain, despite the flood alleviation works which have been undertaken.</p> <p>The impact on the local roads will be horrendous. There are already queues, not just at peak times, which will only get worse and create jams, not only on the A4 but on other, smaller local roads, such as Coxs Lane and Harts Hill road.</p> <p>As a local resident, I spend a lot of time walking my dog through the area which is suggested for development. This is an AONB and also several SSSIs. How can this development possibly be good for the local environment? Could you please confirm what works have been undertaken with, for example the Environment Agency and CPRE?</p> <p>I see that WBC have recently rejected a development between Thatcham and Cold Ash stating that 'building in a green belt area between Cold Ash should not be permitted'. Keeping this area free of development is vital so as to maintain the green belt between them and Thatcham. This development not permitted but you are supporting a massive development which will virtually link Thatcham to Basingstoke about the green belt between them and Thatcham?</p> <p>Flooding</p> <p>We were seriously impacted by the floods in 2007 and I am deeply concerned about the impact this new development will have. Please can you confirm what Thames Water's view of this development is? During periods of heavy rain there is concern about flooding despite the apparent 'flood alleviation' works which have been completed. I think the impact on both the local houses and the Kennet and Avon canal, and the river Kennet will be highly detrimental. Have studies been completed into the environmental impact of the courses?</p> <p>I hope my concerns will be taken into account when considering this proposal and that common sense prevails and the development will be declined.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Troeller, Gordian
Consultee Full Name	Gordian Troeller
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS186
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 15:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I have studied the proposed development in North East Thatcham and strongly feel that this has been badly thought out for the parishes around the proposed development and as such should not be given the approval, and that the plan should be rejected.</p> <p>Specifically, there is no adequate transport plan which would not seriously impact the local area. Floral Way and the proposed development would doubtless funnel traffic towards Harts Hill Road and the proposed exit from the development would doubtless funnel traffic towards Harts Hill Road and subside. Not only will this negatively impact the residents of this village, but the roads up the hill and through the Cold Ash are not suitable for any increased traffic. They are already unsafe and any additional vehicles would only exacerbate this situation. This is in addition to the negative impact on the residents of the village through noise pollution and air quality deterioration.</p> <p>Furthermore the plan does not seem to adequately address the educational and health issue which would arise. Many practices in Berkshire already have problems recruiting GPs and many rely on locums. Furthermore some of the practices which have closed these down recently as they were not financially viable. Also I don't believe a Health Impact Assessment (HIA) undertaken with multi agency input.</p> <p>Finally as regards schooling the two existing secondary facilities (Kennet and Downs) are very busy and it will be hard to accommodate more of students without severely impacting class sizes. The provision of a new school, on the proposed development does not follow the guidelines. There is no satisfactory evidence of the number of pupils the school is to cater for; the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;</p> <p>I have not mentioned the extremely negative environmental impact which this development will have.</p> <p>I strongly urge you to reject the proposal to build these houses and also would ask you to immediately pause the plan until an alternative which has been properly thought out and which addresses the above-mentioned issues.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Billington, Tony
Consultee Full Name	Tony Billington

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS190
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 22:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Matchwick, Prue
Consultee Full Name	Prue Matchwick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS212
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 10:37:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to register my objection to this proposal on the following grounds:- The local roads around Thatcham barely cope with the existing traffic at peak flow times. The level crossing at Thatcham is regularly heavily congested and there is no suggestion of a bridge to mitigate this. Bucklebury Common is an important site for conservation, its ancient woodlands and heathlands must be protected. addition of at least 1500 houses at the bottom of Harts Hill will inevitably mean very many more people on the Common motorcycling which will erode the landscape and harm protected wildlife. The existing schools will not be able to cope with the increase in population and there is not a clear provision for new plan review. There is no evident provision for a sufficient medical facility for the extra adults and children. This development will destroy a valuable part of the local countryside and alternative sites should be found to build t</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes</p>	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Butcher, Nigel
Consultee Full Name	Nigel Butcher
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS216
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 12:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>There will be increased traffic through Upper Bucklebury and Chapel Row and a problem at the junction on the Pangbourn road. The developer proposed a new roundabout on the narrow Harts Hill road to allow traffic in and out of the northern end of the development. This is a narrow road; Harts Hill; this will cause additional congestion on the A4. Cold Ash will see a large flow of traffic going towards Chiseldon. The road is narrow and many do not have pavements; cycling would not be safe.</p> <p>There is insufficient capacity at Kennet school (oversubscribed) and no other plan has been made. School provision for the development and facilities on such a gradient have not been costed.</p> <p>On Wildlife: Bucklebury common would be subjected to an increased number of visitors and the delicate ecosystem would be damaged. There is no evidence of or any strategy for increased biodiversity. A "country park" mentioned in the plan does not meet the criteria. The three small areas inside the settlement boundary are not of any proper environmental value, some "wildflower meadows", nightjars or great crested newts.</p> <p>The strategic gap between Thatcham and Bucklebury; Upper Bucklebury will lose its identity when Thatcham and Bucklebury are developed. The developer in Cold Ash has just been refused permission for this reason.</p> <p>Medical provision: additional GP surgeries are not part of the NHS strategy for the future. No local surgeries have been identified. A surgery of 450 square metres as suggested.</p> <p>Number of houses: Initially 2500 houses were to be built in total, 1250 in the plan period. This has now been increased to 3000. Any mitigation of the impact of the development should be largely completed before sales however what normally happens is that due to poverty and delays this work until the site is largely complete. The developer will wish to utilise the area originally designated for 1000 after this LPR plan period finishes.</p> <p>This LPR is unsound for the reasons stated above.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Baylis, Martin
Consultee Full Name	Martin Baylis
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS211
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 09:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan as I find it unsound. The following reasons apply:</p> <p>Healthcare Provision Proposals for a major development that is likely to have a significant impact in relation to its size and location, should purpose Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. It is Berkshire Council nor the developers, as public and private stakeholders respectively, appear to have arranged or put to the proposed North-East Thatcham development.</p> <p>Schools Provision The provision for education from Nursery / Early Years , through Infant and Primary to Secondary education is not clear in the Local Plan Review (LPR). There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education. Without this provision, the Plan for a large housing development is untenable. West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. How this provision across all school years is not defined or evidenced in the LPR.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Sturme y, Gordon
Consultee Full Name	Gordon Sturme y
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS229
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 14:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Traffic - the development will probably attract in the region of 2,000 or more cars to the area. If they travel west towards Heath Lane and Bowling Green Road at the junctions with Cold ash Hill and Northfield Road there will be congestion on both Heath Lane and Bowling Green Road at the junctions. The proposed development to be developed into a dual carriageway and the addition of traffic lights will only cause further congestion. Current parking provision at Thatcham could not accommodate such an increase in parking needs.</p> <p>Primary Health Care - As there are fewer GP's in the UK than in 2015 the possibility of a viable primary care medical centre is limited.</p> <p>Schools - Currently local schools and nurseries are not in a position to absorb additional children. There is also a number of proposed develop plans are unclear as to provision of both primary and secondary.</p> <p>Sports facilities - There is no evidence of funding or a suitable location in the planning application.</p> <p>I therefore consider the planning application unsound.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Clarke, Lindy
<p>Consultee Full Name</p>	Lindy Clarke
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS233
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 21:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I have lived in Bucklebury for the last <redacted> years and have been a <redacted> for the last <redacted> years. I impact this proposal will have on the local area. My objections are as follows: It was made plain when we did our parish plan that Bucklebury residents very much appreciate the rural feeling of the neighbourhood. This proposal will destroy that feeling. It has always been important to have a strategic gap between the more rural settlement of Bucklebury and the more urban settlement of Thatcham, and building 1500 houses between them will mean that that separator

	<p>The proposed housing is on the edge of the North Wessex Downs AONB and very close to the fragile ecology of the area with its ancient trees, rare heathland habitats and the flora and fauna which flourish there. The increase in traffic and households will put all this under threat.</p> <p>I am concerned about the impact of traffic on our roads, as cars drivers try to avoid traffic jams on the A4 and use the A33 and beyond to get to their destination. Harts Hill is a dangerous hilly road with many bends, and a new roundabout will make it more dangerous. There is no plan to build a bridge over the railway at Thatcham where currently there can be a bridge which will only get worse with all these extra houses. I understand there have been other housing proposals south of Thatcham building this bridge, and yet these have not been properly considered by WBC. Why?</p> <p>The original plan was to build 2500 houses, this has now been reduced to 1500 but in a shorter time scale, and yet the plan is still the same, so the assumption must be that further housing will be proposed at a later date.</p> <p>I am very concerned about the impact on our medical facilities and dental surgeries, all of which are at full capacity before the Impact Assessment does not seem to have been undertaken by the council or the developers, nor does there seem to be any local GP practices. There is a great shortage of GPs, particularly in the south east and it is a mystery how any new ones are staffed. The same is true of dental surgeries.</p> <p>Schooling is another concern. The LPR is unclear on how and where primary and secondary education will be provided for housing development.</p> <p>Finally, why has WBC gone straight ahead with this proposal whilst government guidelines on the need to provide nurseries? Surely the council should have delayed their proposal until the government position is clearer.</p> <p>For all these reasons, I believe that this concentration of housing in this area is wrong and the plan is unsound in view of the rural nature of Bucklebury will be lost forever by this mistaken and poorly researched proposal. I would also like to know if the developers have not been considered in more depth.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Smith, Craig
<p>Consultee Full Name</p>	Craig Smith

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS154
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 12:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p><u>I write to register my objection under the Regulation 19 Consultation Option for the proposed development Buckleberry, Berkshire.</u></p> <p>I have outlined my objections below for your attention:</p> <p>Over development</p> <ul style="list-style-type: none"> The area is already heavily developed, and CRoW applications from landowners further prevent the enjoyment of the site south of the A4 bordering Midgham is already a site of considerable noise, traffic, pollution and litter. Increased development will contribute further to this. <p>Traffic</p> <ul style="list-style-type: none"> The A4 itself between Thatcham and Pangbourne is already prone to flooding during small bouts of rain. Congestion would clearly lead to standstill traffic, increase risk of accidents and an impassable area for pedestrians and cyclists. The road is increasingly busy with antisocial driving: https://blog.passmefast.co.uk/on-the-road/top-10-britains-most-dangerous-roads/ A4 rated as the 3rd most dangerous road in the UK. Regular decibel levels over 100db experienced in nearby housing from performance exhausts and harsh acceleration to reduce speed limits https://www.newburytoday.co.uk/news/bid-to-lower-a4-speed-limit-between-newbury-and-thatcham-passes-first-time/ Cut through via Harts Hill to Buckleberry/Pangbourne – the road cannot sustain the traffic levels, this is seen by the road surface. Train track access/ heavily industrialised area – the single carriage rail bridge at Midgham is a frequent sticking point. A large number without additional development would see increased blockages <p>Lack of private space</p> <ul style="list-style-type: none"> The increased density of population would directly impact the private spaces enjoyed by existing residents. <p>Disturbance of the landscape</p> <ul style="list-style-type: none"> The green space surrounding upper Buckleberry deserves conservation. Out with the Thatcham attenuation ponds, the flood relief scheme ensures the area retains its identity and charm. The contours of the land contribute to this, significant development would ensure a scheme such that flood risk is now effectively managed. Large scale manipulation of this landscape would certainly be detrimental by the flood relief scheme, once again putting the town at risk. <p>Biodiversity</p> <ul style="list-style-type: none"> Loss of important trees and vegetation - massive carbon footprint, loss of habitat for the Hazel Dormouse (endangered) and several red listed bird species https://www.gov.uk/government/publications/wild-birds-licence-to-kill-or-take-for-conservation-purposes-gl40/lis There has been deliberate misrepresentation of claims that development will somehow enhance biodiversity; a large carbon footprint will directly impact hedgehogs, foxes, rabbits, deer including the huge carbon footprint of the building work itself. This will remove Thatcham the opportunity to experience natural greenspace in both their education and upbringing. <p>Loss Of village Identity</p> <ul style="list-style-type: none"> Despite efforts to the contrary, crime rates in Thatcham are on the rise and effective prosecutions have decreased. Thatcham exceeds its neighbour, Newbury. Extending and connecting the town of Thatcham to Upper Buckleberry would increase the crime rate into a rural areas, creating increased incidents of opportunistic crime as well as adding camouflage to those areas. Offences, trafficking and the handling of stolen goods through broad lane and Bradfield South End as reflected in the statistics and exit points of this route. <p>Social Infrastructure</p> <ul style="list-style-type: none"> Number of GPs – no of people 3:26500 with number already exceeding the 1:1000 GP/patient ratio recommended Number of schools- there are 5 schools in Thatcham, Kennet School has 1850 pupils already causing difficult access and considerable traffic buildup in peak times and limiting the prospects of children raised locally. Veterinary practices – not taking on additional clients, only 2 in Thatcham, already have to travel out for treatment Insurance valuations will increase, disturbance to the existing landscape will likely affect the stability of current valuations Property valuations will decrease Shops – already shortages, local shops couldn't sustain the increased population leading to more traffic in and out of the town <p>Please ensure these aspects are considered along with the general public's numerous other objections to the proposed development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holtom, Louise
Consultee Full Name	Louise Holtom
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS228
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 12:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I object the plan as I find it unsound.</p> <p>We live <address redacted> mill house roundabout already having large noise volume from traffic, cars at early hours the pub which would just get louder and busier.</p> <p>Drs and schools are already at a limit. This would put more pressure on limited services.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Rivar Ltd (Represented by Pro Vision)</p>

Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS575
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:37:00
Attached Files	Pro Vision (Rivar) full response.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	Please see accompanying statement for our full representations. In summary, it is considered that the housing delivery of 1,500 dwellings at NE Thatcham during the plan period is required to justify the allocation, particularly given the reduction to 1,500 new homes and the potential lack of deliverability. The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application is approximately 7 years and a realistic average annual build out rate is c.100-120 dpa. Extract from full representation relevant to consultation point: <u>The justification for NE Thatcham</u> The supporting evidence base for NE Thatcham - including the Thatcham Strategic Growth Study (which includes a site allocation for the delivery of 2,500 homes and has not been updated to reflect the position in the current version of the LPR. This work which tested 2,300-2,500 new homes. This work would need to be updated for any Plan to be found sound. There is also some uncertainty whether the Council is actually proposing additional housing at NE Thatcham beyond the current base still refers to 2,500 new homes and the site allocation boundary remains the same. Furthermore, the evidence in the 'Strategic Vision 2050' in accordance with paragraph 22 of the Framework (requiring local plans to look beyond the plan period for larger scale developments). However, the LPR includes no reference to this strategic vision. The site allocation policy also still refers to the delivery of the secondary school. However, there is no updated viability evidence deliverable for a site of 1,500 new homes in total. This raises the following concerns: <ul style="list-style-type: none"> • The Thatcham Growth Study (Stage 3) acknowledges that strategic development at this scale (i.e. 2,500 new homes) is likely to deliver an additional secondary school for the town, without which any growth would cause issues in terms of school development on its own and, therefore, is only half-funded by developer contribution. A reduction to 1,500 new homes to increase this funding gap further, with no indication of how this will be resolved. • A secondary school would internalise a significant number of trips from the proposed development. Indeed, the evidence for NE Thatcham in the Thatcham Growth Study (Stage 3) assumes that the secondary school will have 50% internal trips marks over the potential delivery of a secondary school for a site of 1,500 new homes, the sustainability credentials are poor. As a result, the identification of NE Thatcham is not potentially justified as there is a distinct lack of evidence to support the delivery of 1,500 new homes and consideration of other reasonable alternatives. In particular, the lack of delivery of a secondary school and housing numbers would take away the key justification for growth at this location to help deliver new education provision and infrastructure. The SA/SEA, at Appendix 4, acknowledges this but the Council still proceed on this basis as it is considered that Thatcham is too many.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Please see accompanying statement for our full representations. The justification for the allocation of NE Thatcham is questioned. Notwithstanding this, the timescales and annual rate of completions appears overly optimistic. As a result, it is considered that the delivering completions from 2031/32 at 120 dpa will not meet the need for dwellings over the plan period from NE Thatcham. <Full response attached>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hislop, John
Consultee Full Name	Dr John Hislop
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS280
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 18:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to make a formal objection to the above proposed development on the basis that there are components of the</p> <p>Transport: Only at a unacceptably late stage was it announced that there would be an exit from the proposed development giving adequate details of design. This will cause a significant proportion of traffic (not least that proceeding to an exit to proceed along the B class road from Burdens Heath to the Ridge, Cold Ash. This road does not have pavement with potential for serious accidents, contrary to the SEA Objective 4 and WBC assessment "The policy is likely to have The Ridge is the site of St Finians School a major bottleneck with parents' vehicles in the mornings and afternoons at St Marks school parking close to the Ridge/ Hermitage Road cross roads. Any additional traffic will create even greater at these sites. In addition, a proportion of traffic to and from all proposed exits to the development is bound to use Cold Ash to Hermitage Road past St Marks and Downe House schools which is already used as a rat run to and from attempting to avoid going through Thatcham and Newbury. There are already serious problems at these sites which proposed development and no mention is made of how these will be alleviated, far less acknowledged or included in I personally will be detrimentally affected by the increased traffic on <readacted> on which I am dependent for access further extended delays at busy periods with traffic stationary at calming shikanes.</p> <p>Healthcare</p> <p>The document is singularly lacking in how additional healthcare is to be provided and there is no evidence of a competence required by Public Health England. I question why this is the case and gives me concern that this and other related in a proper and professional manner. I am already directly, detrimentally affected as a senior old age pensioner having appointments for medical and dental care and the reducing pharmacy facilities in the area. A partner of one of the exist is on record citing the difficulties in filling existing GP vacancies far less manning additional surgeries in the area. The the developers have liaised with local medical providers to assess how the increased demands for healthcare will be met</p> <p>Environment</p> <p>The proposed site is on a hillside which is the prominent natural feature leading from the A4 to the AONB and Bucklebury protected areas, and is proposed to be converted into a massive built up area. As a green field site WBC have recognised that the proposed development" will have a negative impact on environmental sustainability which will have to be mitigated. Evidence given as to how this mitigation will be achieved eg where is the detail of the Sustainability Charter that WBC again question the competence of WBC who appear to be driven by the requirement for development and have prescriptive investigative analysis to address the resulting environmental impact. While lip service has been paid to what has been "community parks" no professional judgement has been given of their nature or how they will increase environmental sustainability. As a volunteer on a number of environmental conservation projects for organisations such as the Environment Councils I am well aware of the factors necessary to maintain and create such factors and the proposed plans for development their omission. It should be noted that the proposal is to build a large housing estate around an operating crematorium. WBC would be so favourably disposed to an application to build a crematorium in the midst of a large housing estate</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hindle, Tim
Consultee Full Name	Tim Hindle
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS189
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 21:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to register a number of concerns I have about WBC's plans for the development of 2,500 houses (or is it number does make a significant difference to the extra healthcare and education requirements of the area.) My prime concern is about the extra traffic that will be using Harts Hill Road. This is already one of the most dangerous, twisty and insufficiently wide to accommodate the heavy lorries, vans and school buses, not to mention the toiling cyclists that frequent it. On top of which, it is on occasions quite icy. Encouraging extra traffic to use this route is, quite simply, a bad idea. Then there is the long straight stretch between Upper Bucklebury and Chapel Row. This is already used as a speed trap day and (especially) by night. Since many of the new houses will be relying on the Chapel Row surgery for their GP, speed restrictions to be installed on this stretch of road.</p> <p>And then there is the environmental issue. Already it is clear that WBC cannot cope with the waste that is casually dumped on these routes (or, indeed, along all routes in the county, as far as I can see). This is not only a risk to the wildlife that frequents these routes and other parts of the nearby AONB, it is also an eyesore that is a disgrace to the community that allows it. What happens to the Community Sentences who used to pick up litter? The NE Thatcham development can only increase the roadside gull problem, especially if buses will be shipping the development's secondary school students to the Downs School in Compton in their capacity.</p> <p>Please feel free to contact me about any of these issues if it would be useful.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Baines, Samuel</p>
<p>Consultee Full Name</p>	<p>Samuel</p>

	Baines
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS210
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 10:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

<p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing in relation to the West Berkshire Local Plan Review 2022 – 2039 and the plan to decimate our natural / built environment with 1,500 and 2,500 houses in North East Thatcham. I pay my taxes and I am registered voter. I believe the plan will directly affect my address due to the proximity of the proposed development to my home – less than 1 mile. I believe that as a small town, that Thatcham does not have the necessary infrastructure to support this many houses including care medical facilities, a nearby acute hospital, education facilities – both primary and secondary schools, roads and public transport to my current address due to its quietness and because it is a good place to bring up my child/raise a family. With an additional 2,000 houses in Hungerford Town bolted onto the side of Thatcham, I believe this will have a hugely detrimental effect on the quality of life for those who live nearby. I also think it's odd how the Council often refuse trivial planning permission requests, as reported in Newbury Today refuse to seek to approve plans that will have a devastating impact on the local Countryside. Part of the attraction of Thatcham is its countryside, with a relatively low crime rate compared to more urbanised areas, yet the Council seeks to create a massive crime that an influx of people will cause. Health Impact Assessment – I do not believe that West Berkshire Council or developers appear to have arranged or commissioned an impact assessment specific to the proposed North-East Thatcham development. What is the plan for primary care (GP surgery, hospital), nursing homes and palliative care? Schools provision – Pre-secondary School Provision The provision for education from Nursery /Early Years through infant and primary to secondary education not clearly outlined in the Review. There is no coherent end-to-end plan: this therefore breaches the Council's obligations and duty of care to provide for children. There are no details in the plan of the provision for nursery / early years education. The provision of primary education is contradictory. Secondary Education Provision It is clear that the plan for the secondary school provision is unsound. • There is no satisfactory evidence of the number of pupils the school is to cater for • The location of the school is not clear • The number of form entries is not clear • The timing of funding is not clear • No evidence of that the proposed funding is sufficient West Berkshire Council, as an education authority has a duty to make arrangements for suitable schools provision both in the LPR. Sports field provision West Berkshire Council and your development consortium have not met objective to provide sports fields and you have not provided funding or a suitable location. Supermarkets – Town Centre Redevelopment / Road infrastructure Where is the infrastructure to support this development in terms of Supermarkets and Shops? Thatcham Town Centre is significantly overburdened by an additional 2500 houses. I'd also like to understand what the Council's plan is for the roads as this is clogged with Traffic all the time and through the winter there are always giant potholes. This might seem like a small issue but you it's not for many people who have to pay for vehicle repairs. I can therefore envisage that an increased volume of traffic will cause issues. I'd like to formally lodge this objection to the Proposed NE Thatcham Development under Regulation 19.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Racecourse (Represented by Pro Vision)
Consultee Full Name	Newbury Racecourse
Consultee Organisation	Newbury Racecourse
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS528
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 15:14:00
Attached Files	Pro Vision (Newbury Racecourse).pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Please see accompanying statement for our full representations.</p> <p>In summary, it is considered that the housing delivery of 1,500 dwellings at NE Thatcham during the plan period is questionable. It is not clear what evidence is required to justify the allocation, particularly given the reduction to 1,500 new homes and the potential lack of delivery. The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application to completion is approximately 7 years and a realistic average annual build out rate is c.100-120 dpa.</p> <p><i>Extract of full response relevant to consultation point</i></p> <p><u>North East Thatcham (as allocated at Policies SP13 and SP17)</u></p> <p>The Council has reduced the delivery of NE Thatcham from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council states that NE Thatcham will deliver 1,500 homes over the plan period (compared to 1,250 dwellings expected at the Regulated period). As discussed below, this appears to be unjustified.</p> <p><u>The justification for NE Thatcham</u></p> <p>The supporting evidence base for NE Thatcham - including the Thatcham Strategic Growth Study (which includes a reference to the delivery of 2,500 homes and has not been updated to reflect the position in the current version of the Local Plan Review Testing which tested 2,300-2,500 new homes. This work would need to be updated for any Plan to be found sound.</p> <p>There is also some uncertainty whether the Council is actually proposing additional housing at NE Thatcham beyond the current allocation. The evidence base still refers to 2,500 new homes and the site allocation boundary remains the same. Furthermore, the evidence base does not refer to the Strategic Vision 2050 in accordance with paragraph 22 of the Framework (requiring local plans to look beyond the plan period for larger scale developments). However, the LPR includes no reference to this strategic vision.</p> <p>The site allocation policy also still refers to the delivery of the secondary school. However, there is no updated viability assessment for a site of 1,500 new homes in total. This raises the following concerns:</p> <ul style="list-style-type: none"> • The Thatcham Growth Study (Stage 3) acknowledges that strategic development at this scale (i.e. 2,500 new homes) is likely to deliver an additional secondary school for the town, without which any growth would cause issues in terms of school provision. • Again, the Thatcham Growth Study (Stage 3) notes that the scale of development (i.e. 2,500 new homes) would necessitate a secondary school development on its own and, therefore, is only half-funded by developer contribution. A reduction to 1,500 homes would increase this funding gap further, with no indication of how this additional funding will be resolved. • A secondary school would internalise a significant number of trips from the proposed development. Indeed, the evidence base for NE Thatcham in the Thatcham Growth Study (Stage 3) assumes that the secondary school will have 50% internal trips. This marks over the potential delivery of a secondary school for a site of 1,500 new homes, the sustainability credentials of the site. <p>As a result, the identification of NE Thatcham is not potentially justified as there is a distinct lack of evidence to support the allocation for 1,500 new homes and consideration of other reasonable alternatives. In particular, the lack of delivery of a secondary school over the plan period and the reduction in housing numbers would take away the key justification for growth at this location to help deliver new education provision and infrastructure. The SA/SEA, at Appendix 4, acknowledges this but the Council still proceed on this basis as it is considered that the number of NE Thatcham is too many.</p> <p><Accompanying statement attached></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The justification for the allocation of NE Thatcham is questioned.</p> <p>Notwithstanding this, the timescales and annual rate of completions is not supported and appears overly optimistic. The delivery of completions from 2031/32 at 120 dpa would equate to, at best, 960 dwellings over the plan period from 2031/32.</p> <p><accompanying statement attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Molloy, Stephanie
Consultee Full Name	Stephanie Molloy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS453
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>I object to the West Berkshire Local Plan Review 2022-2039 proposed submission as it is unsound, due to the following reasons:</p> <p>West Berkshire Council needs to understand that this is a rural county, not a built up conurbation. This is how the A4 north of A4 Bath Road, Woolhampton (Site Ref MID4); Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation and Land between A340 and The Green, Theale (Site Ref: HSA 14) are allowed to go ahead. Being a rural council, and due to the nature of the county, we is never going to be a rich council due to the number of inhabitants. But it must remember that each and every one of us has a right to a decent quality of life, easy and acceptable access to work; home; food provision; activities in the open air; decent health care; and dentistry; and schooling for all ages, and in my view this plan does not support that.</p> <p>Why is West Berkshire Council not insisting on all the new properties being built with solar and wind power as from now on, and eco building practices. You do not need to wait for the Government's target date before taking action. Brownfield sites should be built to make up government target numbers. Woolhampton is a rural village and not part of a town, and should never be built on the A4 from Bristol to London, so there are no green fields visible.</p> <p><u>Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation</u> will add a small town onto the north east of the county, a difference in size to the previous plan that was for 2,500 homes. Yes, the plan has been put back in timescales but if it goes ahead in the next plan the extra 1,000 houses will be added. The diagram needs to be amended as to what will be built up to the A4, as the provision of schools etc are dependent on the full number of houses being built, this is no longer clear that can be made.</p> <p>Transport:</p> <p>The current roads in West Berkshire are no longer fit for current capacity and purpose. Adding all these homes in both Woolhampton, Bath Road, Woolhampton (Site Ref MID4) and Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation will have a significant and detrimental impact to Woolhampton and other villages along the A4. As it is, it takes long enough to get onto the A4, and the traffic is clear (taken over 20 minutes before), and not just at peak times, when you can wait much longer.</p> <p>We all know the car is and will remain king as this is a rural place and all transport options are not going to be available. I do not think this has been achieved in this plan. I believe that any traffic trip rates used by West Berkshire Council are unrealistic. I call at 09.30 on a school day and calls it peak time? What proper assessments have been made of the routes that are not going to increase in traffic?</p> <p><u>Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation</u> would increase traffic by at least 3,000 cars per day, each house having 2 cars. We know the number of houses is still not confirmed but in the overall life of the project (at least 2,500 homes, so 5,000 cars. Adding this number of vehicles getting onto the A4 and going through our villages and towns is not fit for access now let alone when you add a further 3,000 cars going over it. In 1998 when moving to Thatcham, the Thatcham bypass - Tull Way to Floral Way - well it is no longer a bypass but an essential road and quite often congested. At peak time roads are closed, people find other cut throughs, causing large amounts of traffic to use unsuitable roads and byways. Roads are not built for this amount of traffic. 3 way traffic lights at Woolhampton's BP Garage last week caused endless queues. We were unable to exit from Woolhampton's side roads, yet again, meaning people turning around in unsafe places and causing accidents.</p> <p>As I have several years before I retire, I do not want to spend my time getting to and from work caught in tailbacks on the A4. I wanted that I would have chosen to live in a town. Mine and my family's quality of life will be severely impacted by this plan.</p> <p>Water, Waste Water and Sewage:</p> <p><u>Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation</u> would impact the local reservoirs and into the Thames and treatment areas. Harts Hill Road was closed for months recently when Thames Water needed to update the pipes up to the A4, an enormous disruption and impacts on business and homes alike, within the Bucklebury parish and surrounding parishes. Homes bordering the way up to Upper Bucklebury, this will again have a detrimental impact on the village.</p> <p>Environmental Impacts:</p> <p>All the proposed plans will have an environmental impact on wildlife, flora, fauna and habitats. There is no evidence that they will have a positive impact on the environment. But there is every reason to believe it will have a significantly negative impact. There is no evidence of any serious attempt to investigate, analyse or systematically address the environmental consequences of the plan in West Berkshire.</p>

	<p><u>Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation</u> will have a huge detrimental impact on wildlife in much needed farmland in the area. We do not produce enough food to feed our nation, so we should be encourage possible use and encouraging the diversity of habitats, for insects, flora, and fauna. The change of use of this land will affect the balance between species, plants, trees, and fungi and mean protected and unprotected species could be lost forever.</p> <p>My objection to Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation is also about the proposal being far from clear, the inclusion of GP practices and no view of any form of discussion with healthcare providers over the</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Shearn, Cara
<p>Consultee Full Name</p>	Cara Shearn
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS298
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	25/02/2023 18:06:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the NE Thatcham development on the basis that the plan is unsound in the following areas:</p> <ol style="list-style-type: none"> 1 Transport: There will be increased traffic both in Thatcham and in Upper Bucklebury where I live. I think this has been increased. The plan for an exit site on Harts Hill will increase traffic congestion. This impacts me negatively as I now drive to the council school bus has been cancelled. I regularly pass pedestrians on Harts Hill and the junction where the bus crosses the road. In addition to safety concerns on this road. There is no modelling results for this junction. Why is this? The council assesses an increase in walking, cycling and public transport use but our bus route in Upper Bucklebury has been cut and the impact on safety and safety concerns so I would be even less likely to use this road walking or cycling. 2 There is no detail of healthcare provision for those living in the new houses. The local surgeries in the area are being closed. This impacts me negatively as further pressure will mean appointments at Chapel Row surgery will be even less available. 3 It will have a significant negative impact from an environmental point of view. Damaging heathland and woodland. This is a major greenfield development in the broader area of the North Wessex Downs ANOB and it will have detrimental impacts on wildlife. The original country park has now been downgraded to a community park and there is no evidence that the environment as claimed and no significant analyses of the consequences to the environment of the plan. The development and additional footfall will damage plants, threaten ground nesting birds such as nightjars and fragmented habitats. I have walked these fields regularly and it is beautiful countryside that will be destroyed forever. 4 There is no coherent plan for school provision. My children currently attend Kennet school which is full! Where are these houses going to go to school. Or will the proposed secondary school be built before the houses. Unlikely as the school has not been established. To this end I cannot see how the impact on traffic can be assessed accurately. Traffic at the beginning and end of the school day is already very congested another school will significantly add to traffic at the junction. This is not defined so an additional secondary school may not be feasible but where else would these children go? The bus route will be young people living in Upper Bucklebury will no longer be in catchment for Kennet school which is just outside the village to go to The Downs on a long bus route away and have friends living far away. This plan would have a negative impact on school runs, more strain on my children's school and less connection with Thatcham if children in our village catch the bus to school.

	Several Local Authorities have put their plan making on hold given changes so that planning inspectorate will no longer make decisions so why are West Berkshire not taking this approach given the strong objections to such a large development on health provision, school provision, traffic numbers and environmental impact?
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Smyth, M C
Consultee Full Name	M C Smyth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS347
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	18/02/2023 14:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes	

* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	REF: THATCHAM NE HOUSING DEVELOPMENT PROPOSAL As a resident of Upper Bucklebury, I feel most strongly that the above application to build 1500+ houses in north east of Thatcham is unacceptable. My reasons are: 1 The increase in traffic would be unacceptable. Already there is a constant stream of traffic past my house during the day and evening hours. Apart from the resulting constant noise and pollution, one particular result of this is a depression in my front garden caused by up in waves by vehicles speeding past in wet weather. 2 Upper Bucklebury is a village which is rural in character and should be allowed to stay that way. This development would reduce the distance between the continuously built-up areas of Thatcham and Upper Bucklebury to less than 600 metres, making it difficult to distinguish Thatcham.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Goaman, Shona
Consultee Full Name	Shona Goaman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS226
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 12:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposed development to the proposal to build 1500-2500 Houses in NE Thatcham because it will have a negative impact on Upper Bucklebury and the surrounding area.</p> <p>1 Transport</p> <p>I am concerned about the extra traffic this will generate through Upper Bucklebury and the additional congestion on the road. I understand that despite assurances that this will have a 'positive impact on road safety' I understand that there is a risk of traffic from the site onto Harts Hill. This is of great concern because traffic to and from the site is only going to go in one direction through Upper Bucklebury. In addition WBC predicts 'some displacement of A4 traffic into wider rural routes such as Upper Bucklebury'. Upper Bucklebury are narrow and already busy and it is my genuine concern that extra traffic will result a serious accident. Upper Bucklebury to Chapel Row is a long straight road encouraging people to drive legally up to 60 miles per hour, speed, making it dangerous to cross at the junction of Carbinswood Lane and Pease Hill.</p> <p>1 Healthcare</p> <p>The proposed development will put enormous strain on our existing GP practices. There appears to have been no discussion with the North East Thatcham Development Consortium and general practices. In the present climate of GP shortages and the fact that GP practices are commissioned by NHS England, and I think it is fair to say there is therefore no realistic prospect of a new GP practice in Thatcham or West Berkshire in the foreseeable future. As far as I am aware, there has been no approach by WBC to discuss opening a new practice. The existing practices are already overstretched and I fear that the arrival of new patients will make a huge demand on our already stretched local GP services.</p> <p>Environment</p> <p>I understand that approximately 4000 people will be living on the development site. These people will need access to the countryside that since SP17 has no proven plans for providing adequate green space and protecting biodiversity and this will include visiting adjacent green areas. You are no doubt aware that management of Bucklebury Common is explicitly focused on protecting the fragile ecosystems. In addition, despite the Sustainability Appraisal accepting that SP17 will have a negative impact on the environment, there is no detail whatsoever of any mitigation measures.</p> <p>In light of the above I feel that the council should take the opportunity to stop this planned development as it is both unsound and has a negative impact on the local area. I am prepared to appear at the public enquiry if invited.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Codling, Heather
Consultee Full Name	Heather Codling
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS231
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 20:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Please find below my objections to the Local Plan as above – specifically re the proposal for setting aside land at Thatcham as I believe this proposal is unsound.</p> <p>As a resident of Ashmore Green of nearly <redacted> years I believe if this land is developed it will have a detrimental effect on the villages, Bucklebury and Cold Ash, and would remove the gap between them and the town of Thatcham. This would reduce the green space in the villages, and where areas of “dark skies” are in place, this would reduce this. Covering more land in concrete etc., will increase the heat island effect in Thatcham. Flood alleviation schemes are being built currently, but this would negate some of that effect.</p> <p>This will also cause damage to the Bucklebury Plateau Biodiversity Opportunity Area, in particular the Common, and the surrounding area. In addition wildlife, some of which is legally protected, would lose a large areas of habitat – which would never be regained and cannot replace this.</p> <p>The villages and towns of West Berkshire lack sufficient infrastructure, in the form of schools (from pre-schools to post primary) and recreation facilities. These additional houses would only exacerbate this. Water and electricity supply is also under strain.</p> <p>The site will cause a huge amount more traffic, Bucklebury and Cold Ash will suffer under the additional traffic using the A4 and M4 to the M4. The roads in these villages are inadequate for the number of vehicle movements currently. The A4 and M4 will be queuing during peak times, again, this proposal will only make things worse.</p> <p>I am also concerned about the number of houses proposed, and that 1500 will not be the limit, and more will be built, and more will have to be even greater.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Aylward, Roger
Consultee Full Name	Roger Aylward
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS283
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 09:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>This is my objection to this plan which I deem to be unsound</p> <p>There are various reasons for my objections as set out below.</p> <p>1. I live in Upper Bucklebury. <Redacted>. To protect the Copse, Lady Hoare has give local villages the right to roam goes ahead, potentially hundreds of people will use the copse for leisure walking thus either spoiling it for all current would block all public use of the area for leisure. Either way, Upper Bucklebury residents lose our hugely.</p> <p>2. If the proposed development goes ahead, it is obvious that at some time in the future, the small Blacklands Copse thus joining Upper Bucklebury to Thatcham with all the loss of house value and village status that would mean for U current residents who have chosen the village for its peace, beauty and tranquility as a village, would be destroyed.</p> <p>3. Kennet School is already over subscribed and local NHS doctor and dentist provision already past capacity. Unless provision, a Primary School and Dr and Dentist provision is built BEFORE the houses go up, the local provision of a</p> <p>4. Concern of increased traffic on Harts Hill Road. I travel to Winchester regularly and its increasingly difficult to get o that more cars are using Dunston Park south as a 'rat run' to avoid the snarl up at the Sony roundabout. This is potenti as children living in Dunston Park walk to attend the Kennet School. With cars parked on verges and dark winter mo One only needs to look at Cold Ash Hill which is now more or less joined to Thatcham and more houses are being The Regency Hotel. Traffic taking children to St. Mary's and/or to St. Finian's, the Pre-school in the Ackland Hall, plu to get onto the motorway by avoiding Newbury, make this a strong reason NOT to put more pressure on Harts Hill as straight, Harts Hill is very windy and often I meet oil delivery lorries, refuse lorries and cars going too fast causing da</p> <p>5. With access to the proposed new estate on Harts Hill, more and more traffic will use the back road through Upper thus the M4 with all the potential extra traffic and risks that entails.</p> <p>6. I'm surprised that this application has got this far on what I understand to be mainly agriculture land. We are cons shortages by the media, especially now with the cost of living crisis and the war in Ukraine. We cannot and must no gone it's gone for ever! Especially as a lot of Brown Field land in available just opposite this proposed development i</p> <p>7. Housing expansion in the Colthrop complex could potentially also solve the age old problem of the Thatcham railw obliged to provide a bridge over the railway crossing in Colthrop with a road access to the road norrth of Thatcham. W and businesses in the local area this would be.</p> <p>8. Over the past fifty years I have lived on <redacted> and now reside in Upper Bucklebury. It saddens me to see the usually with large houses with multiple cars which only encourages more people into the area not solving any traffic villages. I love this area and enjoy the freedom of fresh air, walking and observing wild life, all of which we are told is being. There must come a time when planners think more broadly and more into the future as every concrete buildin 'pleasant land' can only be detrimental by steadily urbanising our villages.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sparkes, Martin
Consultee Full Name	Mr Martin Sparkes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS307
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 10:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to voice my objection to the proposed Thatcham NE Development.</p> <p>The idea of building 1500-2500 houses in an area that is already over populated is totally ridiculous and unsound The on:</p> <ul style="list-style-type: none"> • Transport - the roads are not built to accommodate the additional traffic that will be generated. This will lead to increased hazards, and damage to the environment. • Healthcare & Education - The existing Health centres and Schools will not be able to cope with the additional population. • Environment - the area is one of outstanding natural beauty which will be destroyed through this over development.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beeson, Sarah
Consultee Full Name	Sarah Beeson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS470
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 12:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>There are no strategy documents to show how environmental policy requirements will be achieved or how the negative sustainability will be addressed by the proposed North East Thatcham development.</p> <p>The education need for the proposed North East Thatcham development is unsupported by appropriate recent pupil the council would not appear to be addressing its obligation to provide educational facilities for children.</p> <p>There is no full Health Impact Assessment for the proposed North East Thatcham development</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>No Health Impact Assessment for the North East Thattham development.</p> <p>No evidence to support pupil numbers to be catered for in the school provision for North East Thattham development, no details of timing or sufficiency of funding, no details of flat land allocated for school sports fields</p> <p>The Bucklebury Plateau Biodiversity Opportunity Area requires protection from increased footfall to protect and maintain its habitat. The North East Thattham development details its open areas as laid out to encourage engagement and focus on meeting the environmental needs of the wider area or providing protection to the precious nearby habitats. Increased development on Bucklebury Common would have a negative effect on this ecosystem and would encourage more visitors to the common</p> <p>WBC itself predicts some displacement of A4 traffic onto rural routes in its plan but does not consider that these roads are subject to resultant dangers, or separate impact that this will have on the current nearby local village residents' quiet enjoyment of their surroundings. It is now a suggestion of a roundabout on the steep and twisty Harts Hill road to connect to the north of the North East Thattham development further increase traffic onto the rural routes and the siting of a roundabout on this hill would introduce a significant traffic impact at this junction to indicate any thought as to how this might work.</p> <p>Thattham rail station with its crossing in its current form is not suitable to provide a public transport hub for the Thattham area. There currently appears no strategy to deal with this. The proposed North East Thattham development site is not flat and is close to Thattham town centre. Accordingly, the uptake of walking and cycling routes to any large extent is unrealistic, and footpaths do not represent the only viable means of transport, either to the station, where parking will be inadequate or to the final destination.</p> <p>Alternatives to the proposed North East Thattham development do appear to have been fully considered.</p> <p>Changes in Government thinking on housing targets and the nature of future housing developments does not appear to have been reflected in the documentation now under review.</p> <p>The present strategy takes insufficient consideration of the needs of current residents living in Thattham and the surrounding area, and the impact of the proposed North East Thattham development on them, i.e. the education of their children, their transport needs, their quiet enjoyment of their surroundings. Local services are already at capacity.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Co-operation with the local health authority to consider the most advantageous delivery of medical provision to the people of the area? Who exactly is going to operate the suggested surgery?</p> <p>Co-operation with the environmental groups for the surrounding areas of Outstanding Natural Beauty? There seems to be many positives in the impact of the North East Thattham development and much reason to fear permanent and irreversible damage to the area.</p> <p>Co-operation with the Education department? The education plans seem inconsistent and incomplete. Further, such education provision will follow after the house building program leaving many years of inadequate provision while development is ongoing.</p> <p>Co-operation with Thattham and surrounding village councils? How many of these support this plan?</p> <p>Co-operation with service providers? Thattham sewage works overflows into the local waterways when overloaded. Have alternative ways of dealing with this been considered?</p>
<p>4. Proposed Changes</p>	<p>Further studies to look more fully consider the environmental, transportation, health and educational impact for the people of the area before proceeding any further with this part of the current plan.</p> <p>The world has greatly changed of the last few years. Taking this into account, pausing the local plan in its entirety for a period of time would be actually now needed, recent changes in Government policy and the better alternative ways there might be providing for the future.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	No

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	London, Robin
Consultee Full Name	Robin London
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS606
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 16:43:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<ol style="list-style-type: none"> 1 Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands and heathland. 2 Causing detrimental impacts to legally protected wildlife. 3 An estimated 4,000 people will be concentrated in the development site. They must have access to green space for their wellbeing. 4 The impact on traffic in the area particular Harts Hill Road with traffic being funnelled upwards towards Upper Bucklebury causing congestion but will also be dangerous. Harts Hill is very narrow and already dangerous with buses, lorries and cars. 5 Kennet School is already oversubscribed and local NHS doctor and dentist provision already past capacity. Unless additional provision, a Primary School and Dr and Dentist provision is built before the development begins, the local provision will collapse. 6 There must come a time when planners think more broadly and more into the future as every development allocated to 'brown land' can only be detrimental by steadily isolating our villages. No mobile signal, limited public transport and a lack of green space through. <p>I am a concerned resident asking you to reconsider this plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Spours, Peter
Consultee Full Name	Peter Spours
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS270
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 14:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>This letter is an OBJECTION to the LPR, particularly those aspects related to SP17. The writer finds the LP proposed set out below. I am prepared to appear and make addition submissions to the Planning Inspectorate is asked.</p> <p>Legal Issues</p> <ol style="list-style-type: none"> 1. The Reg 19 consultation period is 6 weeks starting on Friday 20th January. However, WBC's website was partially maintenance took place on 21st and 22nd January. Hence the 6-week consultation was short by 2 days. In addition, on those days making any review of evidence impossible. The consultation is flawed. 2. The local authority has a duty to consult and cooperate in the preparation of its LPR. WBC has failed to do so in s consulted has done so begrudgingly. WBC failed to consult Bucklebury Parish Council on boundary changes and has ignored. There is nothing in the evidence to suggest that WBC has consulted the relevant authorities on medical provision or 3. The site has two pipelines crossing it; one for oil and the second gas. There is a need to consult the pipeline authority. WBC has done so. Land surrounding these pipes is a sterile zone to protect the pipes from damage. This area is not s on the access points on Floral Way and the A4 is not considered. 4. The provision of secondary education is inconsistent with WBC's own guidelines, being too small to be viable. 5. WBC has a duty to consult and prepare a Health Impact Assessment. This has not been done and the plans for h not properly described or viable. 6. The choice of Thatcham Northeast was driven by a HELLA study the cost of which was paid by the Thatcham Nor document is missing from the evidence. The new HELLA in the evidence pack post-dates the plan approval by WBC considered it in reaching their decision to approve and delegate authority to submit the LPR to public inspection. 7. A vision for Thatcham was belated prepared but this was contingent on THA20 being the selected site and is woel for the town. It too is missing from the evidence. It is notable that the vision should have been to starting point follow inescapable that WBC reversed this process thereby frustrating logic and hence is not positively prepared. <p>Traffic</p> <ol style="list-style-type: none"> 1. Throughout the Reg 18 period and in public meetings between Bucklebury Parish Council and WBC planners' ass ingress and egress would be to and from the A4 and Floral Way. Hidden within the evidence pack offered at Reg 19 a ju There are no drawings of its position or topography. This late addition, lacking any analysis demonstrates a lack of pos with the communities affected. The addition of this junction is both a danger and will have a significant detrimental effe because Harts Hill is narrow, winding and the junction's necessary position is shielded by a blind bend in the downhi 2. The addition of 1500 or more houses will result in more car movements. There are no identified employment oppo and few within walking distance. Additional traffic is inevitable. 3. The A4 is already gridlocked at peak times and residents will seek to avoid jams. The junction with Harts Hill provi satnavs tested show that traffic for the A34 and M4 west will route via Cold Ash and that for Theale, Reading and the M Chapel Row and Bradfield South End. This will be detrimental to village life and dangerous for residents. 4. Traffic through the villages, Upper Bucklebury and Cold Ash will increase – this is acknowledged by WBC – but no shown. The roads are quiet lanes without pavements, narrow and used by children to walk to school or to the school access the Common and to bridleways. Cyclists use the lanes for recreation. 5. No credible account of traffic is included in the evidence this being a demonstration unsoundness. <p>Site Selection</p> <ol style="list-style-type: none"> 1. It is the writer's understanding that all possible sites be considered on their merits, that preference be given to bro benefits be properly assessed. WBC failed in this task. The abandonment of Grazeley as the preferred site prompted which was exploited by the THA20 promoters. They provided WBC with funds to prepare a HEELA. However, that wo promoted the benefits of the funder's site, THA20 and seriously underrepresented the competitors. Since then, each from confirmatory bias. Critical thinking is absent and demonstrated throughout the evidence with the sustainability a assumptions lacking any supporting evidence. 2. A key feature of a competing site, that at Colthorp Mill, was the provision of a bridge over the railway to replace a HEELA failed to mention this even though the bridge is sorely needed and high on the wish list for residents. This erro many times but was not addressed. This failure to consider alternatives makes the LPR unsound. <p>The Environment</p> <ol style="list-style-type: none"> 1. The proposed development is 'in the setting of the AONB'. This is accepted by WBC yet there is no evidence that t environment. WBC has an obligation to enhance environmental sustainability and biodiversity, but no evidence is pre achieved. This subject must be in WBC's mind because it was so vocal on these subjects when it opposed developm scheme, much larger and containing the Siege Cross site is said, without support, to have a positive impact. This is s

	<p>2. The long-term plan for the maintenance and enhancement of Bucklebury Common relies on modest numbers of v fragile infrastructure. WBC plans to increase the vehicle traffic – by providing an additional carpark – and ‘facilitating users’. This is the antithesis of what is needed and demonstrates that WBC has not consulted with or cooperated with</p> <p>Conclusion</p> <p>The choice of Thatcham Northeast for development of 1500 or 2500 homes is a poor choice. The process used for s because of the involvement and funding of the work by those who financially benefit. This fails any test of propriety. It itself from this by failing to include the flawed HELLA and vision documents even though these were the core decision</p> <p>The LPR is unsound, undeliverable and was not prepared in a cooperative way. It fails to reflect the needs of the community</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Parker, Lisa
<p>Consultee Full Name</p>	Ms Lisa Parker
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS398
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	28/02/2023 06:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing to object to the above plans as I feel that the plan is unsound. Negative implications: Loss of countryside Pressure on infra structure (the roads are already busy, the state of the roads with pot holes are already causing problems, all these extra cars/lorries) Effects on local services eg schools, doctors, dentists (schools currently have waiting lists - doctors currently around 10 weeks - dentists - even longer to get appointments) Facilities - we usually have problems with water and that is with the numbers living in the area at the moment, putting extra pressures on resources
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Vrij, Joris
Consultee Full Name	Joris Vrij
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS349
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 15:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	No

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Please find below my objections to the Local Plan & North East Thatcham SP17 development (Reg 19consultation) and lacking in sufficient evidence to prove that it will not create a negative impact to the existing communities including:</p> <ol style="list-style-type: none"> 1 Transport The LP & SP17 (eg. Harts Hill Road, exit & car parks proposed, sheer volume of new dwellings) will increase traffic on Upper Bucklebury & Cold Ash and therefore will have a direct negative impact on those currently living there – safety on the roads, wildlife impacts. There is no sound modelling to show the WBC statements that this will be mitigated. Problems caused by the traffic related to the new development. The air quality assessment is invalid due to it not taking into account this traffic & pollution levels. 2 Safety There is no evidence presented that the proposal increases the safety of pedestrians, cyclists and wildlife and noise. This can be mitigated on roads such as Harts Hill Road. In fact the proposed exit on Harts Hill Road is likely to be already a dangerously bending road, with no footpaths or cycle ways. Further reduction of hedgerows or trees for sustainability even further is not a sound mitigation for building footpaths. There is also no modelling to identify the impact of motor or moped traffic & the economic, social and safety negative impacts of this on the residents of Long Grove (who are already impacted). 3 Healthcare There is no evidence of the required level of consultation, multi party discussions and detail of any acceptance criteria relating to healthcare facilities, notably GP surgery / dental care – lack of detail on adequacy of the size, location, and how the existing users such as myself will be positively impacted and not negatively in the short and long term. Assessment or modelling of the thousands of increased patient numbers on GP and dental practices and how this will impact dental care is already out of reach for myself and I have to fund private medical insurance due to the current state of NHS facilities which will only get worse with the influx of more patients 4 Environment The council accept that there is a negative impact on environmental sustainability but overall believe this is outweighed by the gains. This is not backed up with sound studies, detailed assessments or mitigation plans and has unsubstantiated the sufficiency of proposed funding by the Developers, no commitments as to timing and how this can apply to any reduction from 2500 to 1500. There are no impact reports or strategy documents setting out how the biodiversity net gains are to be achieved only an 'expectation that the future design will cater for it'. No sound evidence is presented on how the council can deliver this without negative impact to protected and non-protected wildlife, AONB or local existing communities & meadows. The lack of evidence of consultation on biodiversity, ecosystem impacts, and years and years of building works on the site. The lack of evidence of consultation on biodiversity, ecosystem impacts and the outweighing social/economic benefits of water and waste drainage can be provisioned for the volume of dwellings proposed is a major flaw. 5 Housing volumes The LP tries to position this as a reduction in dwellings over the period to 1500 (incorrect as reg 18 consultation never had the door open to the overall volume being more like the 2500 originally proposed (settlement boundary remains the same). There is no evidence that the Secretary of State's written statements have been considered and meet his statements on local housing need reflected in plans. Other local authorities have taken this opportunity to delay their plans to gather more evidence.

	<p>balanced and sensitive outcome which WBC is not doing. WBC have also seemingly added in other sites into the plan without due process, timing & evidential justification.</p> <p>6 Schooling No detailed modelling has been provided to evidence the demographics and potential future demand for schooling. The proposed primary and secondary schooling in the LP cannot be accurately assessed, nor rule out negative impacts on surrounding communities especially if their choice is reduced to one secondary school only due to proximity rulings favouring the development area. It conflicts between the volume of places at primary (2.5 forms) to those at secondary level for 4 forms of entry to be considered viable economically and socially and contravenes WBC's own policies. It is also not clear if relevant commitments for joint use with sports fields, location on flat ground, and funding required to deliver the plan are realistic. I conclude that the LPR & SP17 are unsound and will have a detriment negative impact on myself and the local community.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Cooke, Mathew
<p>Consultee Full Name</p>	Mathew Cooke
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS318
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	27/02/2023 14:37:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>I find the LPR unsound for a number of reasons with particular reference to SP17, the proposed North East Thatcham are listed below.</p> <p>1. Traffic Impact: I'm very concerned about the amount of increased traffic that the development will bring to Upper Bucklebury. A significant number of homeowners in the proposed development will use the village roads as alternatives to the A4. I am extremely concerned about the plan for an exit at the north of the proposed development onto Harts Hill Road as this is one of the village routes. There are no modelling results for this junction in the Transport Assessment and no drawings either. For all the other proposed junctions, I find it very worrying that the proposed junction on Harts Hill Road does not appear to be suitable. This road is completely inadequate for larger amounts of traffic, has no pavements in some areas and has a high proportion of potholes. I have a village school with many children walking to school along these routes so this needs to be given serious attention. I believe the increased traffic through Upper Bucklebury will have an impact on the standard of life to those that currently live there.</p> <p>2. Environmental Impact: It is clear that the proposed development on a greenfield site and so close to the AONB and other legally protected wildlife will have a huge detrimental effect to the local environment and public enjoyment of it. This is of such an asset to our community that I'm passionate that we do all to protect it for future generations. There is no evidence to indicate that there is a strategy to protect the AONB and the biodiversity within. We should look to develop brownfield sites rather than build this overbearing development. This should be a very important consideration within West Berks Council's sustainability strategy.</p> <p>3. Schooling Impact: There are no details in the LPR for the provision of nursery, early years and primary education. I am concerned about the planned number of schools or form entry requirement, with referenced data being 12 years old, I fail to see how this can be used to secondary education, many children from Bucklebury attend Kennet School (nearest catchment school), which is a long journey. As children who live nearer to the school are given precedence, this would mean that children from the proposed NE Thatcham would take priority. Children from Bucklebury would have to go to The Downs, which firstly they are only in a secondary catchment area.</p>

	<p>minute bus ride away compared to the very short journey to Kennet. The LPR is incomplete and contradictory on the in the area. The latest LPR is in contradiction to the *Supporting documentation. It proposes that the sum of £15 million to Secondary Education. There are no details of the location of the land to be provided and hence no possibility of as that a more detailed planning approach needs to be taken to the overall provision of education for the Thatcham area can be fully assessed.</p> <p>4. Adequate Consideration of Alternative Sites: I'm not comfortable that enough consideration has been given to the accommodate housing options across West Berkshire. Since this consultation was initiated there has been a dramatic acceleration in the demise of Town Centre use. I believe that there will be a vast number of brown field sites that could meet Berkshire requirements as a result. The re-development of these sites for housing should be given priority ahead of development on greenfield land.</p> <p>5. Timing: Michael Gove announced in Dec 22 the launch of an NPPF consultation running until 2nd Mar 2023. Whilst all councils have decided to pause their plan making. I don't understand why West Berks isn't applying similar prudence to this consultation could change the calculated housing requirement for West Berkshire, which is currently a stretching ANOB and land. This outcome could dramatically reduce the requirement for housing and the need for this overbearing community.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Duff, Colin
<p>Consultee Full Name</p>	Colin Duff
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS718
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	01/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Regarding the following criteria:</p> <ul style="list-style-type: none"> - Sustainable transport through routes; - Mitigation of the development's impacts on the highways network with improvements to existing junctions where the access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; - How adverse impacts on air quality will be minimised. <p>The Strategic Study acknowledges that Thatcham has developed over many centuries overwhelmingly on an east-west axis and that the large majority of movement for Thatcham's population is by motor transport due to poor public transport. At peak times congestion and the A4 is busy for other parts of the day. It notes that access to and from the north (mainly for the M4) avoiding already congested and busy Newbury, is via Cold Ash. It acknowledges that access to and from the south (mainly for the M4) crossing adjacent to Thatcham Station, the barriers being closed to road traffic for the majority of an hour during day</p>

	<p>Yet in the development of Thatcham strategy there are no proposals at all to address these two issues to the extent of a "difficult pile". Additionally the strategy for NE Thatcham actually proposes limiting access to and from north. Nor does it accommodate increased traffic on already busy roads, instead only focussing on details of road junctions. To which quality along the A4 and Floral Way for which no mitigation is proposed. Add to which given that Thatcham is a hub and massive error.</p> <p>There is no public transport north out of Thatcham save for a very infrequent minibus service to local villages. There is no direct bus service to Thatcham and requires a change of bus in Newbury, making such journeys unviable unless you can spare a large portion of your day for the development of Thatcham strategy there are no proposals at all to address this.</p> <p>If Thatcham is to be expanded by a third of its current size there is no guarantee there will be sufficient local employment opportunities and south make employment opportunities in these directions, i.e. Basingstoke, Andover, Chilton, Abingdon, Wallingford, making it difficult for travelling.</p> <p>Additionally, aside from traveling to and from work, for a whole host of reasons on occasions the population of Thatcham is isolated and this also suffers from impairment north and south.</p> <p>The healthy development of Thatcham will be impaired, and will adversely impact Newbury and local villages, without the necessary infrastructure and south. Thus I do not think the plan is sound, or competent in this respect.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Major regional investment is required to give Thatcham independent and unimpaired transport corridors north and south and provision.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bovington, Jason
<p>Consultee Full Name</p>	Jason Bovington
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS304

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 18:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing to the Local Plan as I find it unsound in a number of ways. It appears to have been rushed, not coherent responsibilities, contradictory in places and lacking a great deal of the detail required to be judged sound. Specifically Thatcham NE Development it seems a particularly ill thought through plan and no longer completely necessary given the approach to development and the recognition that local circumstances need to have greater impact of the level of development in Berkshire with large areas of land not able to be developed on and large areas of natural beauty fall squarely in that category. To build such a large development on green belt land is deeply questionable and appears to be being led by developers

investigate the potential development of brownfield sites rather than greenfield has been inadequate and again appear rushing through this proposal.

Having lived in Thattham for 21 years one of my most personal concerns is the potential impact on flooding. My family for 8 months back in 2007 and the prospect of a large amount of fields being concreted over from the very direction from fills me with dread. I realise that a lot of work to improve the flood defence system has been undertaken but that yet with extreme weather. To build in this location seems to me to be reckless and there is nothing in the local plan of the impact of this development on potential flooding of the wider area and as such I do not see how the plan can be being done upfront. I find this irresponsible.

In terms of the plan itself in relation to the development I believe there are a number of areas that make it unsound. To be to have a very large development in Thattham to help improve the infrastructure. Yet the document itself has very little commitment on how the infrastructure is actually going to be improved. And it appears therefore that the development will place a strain on a number of areas that are already over stretched. Specifically:

Provision of education. The existing schools in the area particularly Kennet school have no ability to expand further. This is contradictory with the solution to provide secondary education for these existing houses and is therefore unsound. It has no details on the location of the land. It references £15m being contributed by developers, but nothing on what this is for or of what this sum could deliver. It is recognised that schools need to be a certain size to be viable, but the land, promised for the development itself isn't big enough to support a new secondary school. It clearly doesn't have a proper plan to deliver the additional houses and therefore is unsound.

Healthcare: My family are patients at the burdwood surgery and this surgery is currently very stretched. Ability to get a GP has deteriorated. In addition we are nhs dental patients and again these services are overstretched. The plan proposes to provide dental services within the development. However there is no associated health impact assessment with the plan or any details of what will be set up with the proposed development. There has been no investigation of this and therefore no assessment of the provision of dental services. Therefore it is impossible to say that this plan is sound. It again speaks of a poorly thought out plan with little detail to enable it to be properly assessed.

Environment: The statement that that the overall plan will have a positive impact on the environment I find laughable. The development on green belt land. The sustainability appraisal itself states it would have a negative impact on environment that need to be mitigated. But as in the rest of the plan there is obviously no detail on what would be done to mitigate this impact that so little has been done to try to promote the development of smaller brownfield sites which is actually now the green environmental ground this plan is unsound.

Traffic and safety: the development is going to undoubtedly bring increased traffic to already busy roads. I drive every day and there are significant traffic jams along that road to the extent that the road up to bucklebury is used by some drivers in places is not designed for lots of cars. This development at the base of and straddling harts hill road is going to significantly increase traffic along the a4 and up through bucklebury and chapel row. There seems to have been no assessment of the impact on road safety. So how the council can say the policy will have a positive impact on road safety is beyond me. Particular concern seems to have been undertaken.

Given all the inconsistencies and the amount of detail missing the obvious thing would be to revisit the plan, particularly in line with governmental guidance on development. To properly assess the alternative of developing smaller brownfield sites or to detail how this development and actually detail how the infrastructure and services will be delivered to support this development.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Monk, Pauline
Consultee Full Name	Pauline Monk
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS275
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 17:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am objecting to the Thatcham NE Development plan as I believe it to be unsound, for the following reasons.</p> <ul style="list-style-type: none"> - Healthcare provision - current GP and Dental surgeries already full. No provision for expansion of current facilities and will manifestly increase demand. As older residents, we are concerned we would experience even more difficulty access in years. - Environment - hugely important. This is a rural, farming community. Crops grown here feed the people; the land should be protected for that very reason alone. More housing built on these nutrition-producing fields will intrinsically decrease yields and threaten the ability to feed the nation. - Transport - because of the very significant increase in volumes of cars etc., any development must not allow vehicle access onto the roads in our part of the village, our lane in Upper Bucklebury is narrow, rural and has no pavement or lighting. It could only be funnelled through via access from Harts Hill. Any upgrading of the roads/lanes would downgrade the rurality of this area and can only be achieved by destroying the countryside around. - Education - more housing equals more school places needed. However, numbers of Pupils are crucial. Exactly what is needed it's not clear. Funding - is this sufficient to provide the legally obliged level of education the government demands. - Sports fields provision - this stated provision is neither clearly funded nor a location given. A level piece of land would be needed in the current plan? - Leisure activities in a rural area - walking, running, riding, bird watching, flora & fauna observation and immersion. The inevitable creep of urbanisation progresses up the hill to Upper Bucklebury and the other villages. - I therefore ask that the council allows opportunity to consider the government's updated planning guidance, to pause and consider the implications of the proposed development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beeson, Steve
Consultee Full Name	Mr

	Steve Beeson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS377
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 10:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	<p>My general concern is that this process of developing a Local Plan is required by law to be consultative. WBC have had to consult with all Town Councils and Parishes and residents. Reg 18 was released over Christmas in 2020/2021 with very little comment. Regulation 19 has been delayed multiple times and is extremely complex and exhaustive in the volume of documentation. The consultation period is only 6 weeks which is totally unreasonable for any layman to be able to make a thorough review of the WBC documentation. Finally Reg19 was launched on the 20th Jan 2023, for their website to be taken down that weekend. As many people have to travel to the council offices for documentation over the weekend is the only option. In which case their timescales for review should have been extended to ensure the information to be available for the published duration.</p> <p>Throughout the various websites and documentation supplied by WBC there are references in the form of website URLs. It is impossible to make informed comments on the Reg 19 Submission.</p> <p>Throughout the whole Reg19 submission there is a cavernous gap of evidence to support the plan, constant use of the phrase 'to be provided' will be provided at a later date which makes the whole process and ability to analyse and subjectively review the Reg 19 submission the whole process is unsound.</p> <p>I would also like to say that the significant material changes between Reg18 and Reg19 must indicate that due process has not been followed. The public have not been given the opportunity to consult again before Reg19 which is unacceptable.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	No

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Section 1.19 In February 2020, we published our assessments of sites that were submitted to us as part of the Housing Assessment (HELAA). We also undertook focused consultation with parish and town councils, and NDP groups seen in the HELAA.</p> <p>Comment : it is a fact that WBC republished the HELA as part of this consultation on the 20th Jan 2023. In which case this document refers to.</p> <p>Comment : WBC did not engage with Local Parish Councils and there is no evidence presented of this consultation. As part of the https://www.westberks.gov.uk/local-plan-evidence document</p> <p>Site Selection Criteria <weblink to site selection criteria></p> <p>This document includes the following statement:-</p> <p>2.11 The assessment is a key part of the evidence base to inform the site selection process. However, it is important whether a site should be allocated for development. Rather it assesses and identifies a catalogue of sites that are for consideration. In West Berkshire this document is the Housing and Economic Land Availability Assessment (HELAA)</p> <p>2.12. This site selection methodology uses the HELAA as the starting point to identify which new sites should be allocated.</p> <p>The latest version of the HELAA document was re-released on the 20th Jan 2023. Clearly this is the day Reg19 started as being at the start of the process for the LPR and site allocation. Additionally the revision of the HELAA as part of the process completed thus far.</p> <p>Within the Local Plan Evidence document the following documents are referenced.</p> <p><i>Thatcham Strategic Growth Study</i></p> <p>A three-stage process that assesses planning for the future of the settlement.</p> <ul style="list-style-type: none"> • Stage 1: Thatcham Past (May 2019) [2MB] • Stage 2: Thatcham Present (April 2020) [1MB] • Stage 3: Thatcham Future (September 2020) [12MB] <p>This strategy which forms the significant basis for the LDP is based on the HELAA (Feb and Dec 2020 publications) Indeed in the above documents the whole strategy is based on the HELAA at that time, obviously with the HELAA updated subsequently out of date and should be removed from consideration as part of the evidence for the LDP.</p> <p>These documents clearly have housing numbers that differ from the latest plan of 1500 houses. However these documents reflect this, in particular in the areas of traffic, schooling, the viability of amenities such as doctors, water supply and waste they contain detailed information on the viability of the site based on</p> <p>Indeed in the Stage 3 document noted above the following section can be seen.</p> <p>We have also considered a lower density option, whereby only 2,300 units can be delivered. This effectively reduces development, and enables the costs for healthcare contributions and for utilities to be marginally reduced, as these are 2,300 units. This reduces the outturn Residual land value as follows: Option 1 £27,618,800 a reduction of 12.3% for an 8% drop in unit numbers £26,696,800 a reduction of 12.65% for an 8% drop in unit numbers</p> <p>This indicates the disproportionate effect that this would have on overall viability.</p> <p>However, the latest proposal from the developers is for 1500 houses which must therefore SIGNIFICANTLY reduce the viability this is evident in the Reg 19 Consultation and submission, which must surely mean that the Reg 19 Submission is unviable. Collusion with regards to the Thatcham NE Documents as part of the plan Submission.</p> <p>With regards to the above 3 documents, these documents were TOTALLY funded to the sum of £100,000 for by the developer in the three documents. This must surely call into question the viability, ethicality and fairness of having the main developer markets their site.</p> <p>No other developers, even those identified as potential sites in the HELAA, were offered a chance to contribute to the plan were any other developers provided direct access to the authors unlike the Thatcham NE developers who were obviously not.</p> <p>No other developers have their marketing material or any other documentation submitted as part of the Reg 19 submission. No other developer been granted this privilege if it not in collusion with WBC.</p> <p>The fact that WBC were not forthcoming on who funded this report also raises suspicion, the fact on funding was not disclosed in the information request. WBC deny collusion with the developers but it is obvious why they would do this.</p> <p>WBC initially published the FoI request and subsequent response on their website but this has since been removed from their consultation submission.</p> <p>The Thatcham NE Growth Study section 2.44 talks about the GPSS oil pipeline across the South of the site and the need to talk to the owners of these as part of the planning process and WBC have not done this.</p>

I would say this further calls into question the soundness of this process and supporting documentation and even its to one preferred developer in all fairness and not others.

The fact that WBC did not put the funding of this report out to tender is also against their own legally binding policies

Under section 6A of the Education and Inspections Act 2006 (the 'free school presumption') where a local authority new school it must, in the first instance, seek proposals to establish an academy

It is not clear if WBC have sought proposals for the three proposed schools in the LDP. This is in contravention to the

The provision for education from Nursery, Early years, through Infant to Secondary education is not clearly defined v coherent end to end plan which therefore breaches the Councils obligations to provide education facilities for children this provision ?

Because of a lack of a coherent Plan on Education Provision across the various proposed developments it is impossible to knock on effect on traffic. The siting of a secondary school to the NE of Thatcham could result in a significant increase considered in the traffic plans and models in the Local Plan.

Pre-secondary School provision:

There is no provision in any of the LPR for Nursery or Early years provision.

The provision of Primary school education is unclear, disjointed and contradictory. There is no data or evidence on the Form Entry requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary available, the only data provided in from 2011, it is impossible to assess if this is sufficient. It also doesn't demonstrate school place provision, clearly schools need to be available before houses are built.

Secondary Education provision:

The Plan is inconsistent and incomplete on the provision of secondary schooling in and around Thatcham. It is also the latest Local Plan is in contradiction to the Supporting documentation. The latest plan proposes that the sum of £15 million be contributed by developers to Secondary Education. There are not details of the location of the Land to be provided and hence the a

Please see the link below to The Thatcham NE Development Plan 2020 (part of the Local Plan supporting documents) <weblink to Thatcham growth study>

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC , proposes a (Form Entry) secondary school, half-funded by developer contribution

Government guidelines are that less than a 6FE Secondary School are not sustainable.

The Development plan states that the NE Thatcham development, when at 2500 houses, is not sufficient to fill a 6–8FE

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The development proposed is not sufficient on its own to fill a 6-8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. It is not considered feasible for a new school to be smaller than 6FE.

With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school is not sustainable in this location.

Earlier in this same Thatcham NE development plan it was noted that the education provision exercise was based on data from 2011. Clearly the use of 12 year old data is unsound.

The Local Plan Review to 2039, Policy SP17, now states that land (not the Secondary school itself) will be provided for a

On the basis of the above it is clear the plan for secondary school provision is 'unsound' on the basis there is no evidence of school children the school is to cater for; the location of a school is not clear; the number of form entries is not clear; a 6FE school is unsustainable; that the timing of the funding is not clear; that there is no evidence the proposal meets the Councils obligations to provide education.

Conclusion on Schooling :

Based on this and considering the Council as an education authority has a duty to make arrangements for the provision of education clearly how this obligation will be met for all school years is not defined in the Local Plan, and as such the Local Plan is

Sports Fields:

The plan talks of the provision of sports fields. This raises two issues not answered in the Local Plan:

Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the A4 road and is most traffic fumes.

There is no funding earmarked for these facilities.

If WBC are assuming that the school playing fields would be available as Sports Fields then this assumption is unsound. If not viable, then the playing fields will not materialise.

Additionally, many schools do not want to open their playing fields to the public for safeguarding and other concerns. **on the Provision of Playing Fields.**

The plan does not provide sufficient evidence to enable a decision to be made on traffic Impact to be assessed.

This LP does not provide any sufficient infrastructure gains, the Colthrop plans provides a bridge over the railway which will reduce congestion and subsequent pollution.

Additional Comments:-

The information available to support the current consultation being undertaken on the Local Plan has several major issues. These include:

- The housing numbers for northeast Thatcham – positioned in Reg 19 as a reduction from 2500 dwellings to 1500. The 2018 Consultation envisaged that only 1250 dwellings would be built in the plan period, and this has increased to 1500 as both a minimum and an approximate number and the supporting studies are still based on an eventual size of 1500 homes proposed for this site could therefore be increased to the original 2,500 when the Plan is reviewed after 2039.
- The update of the HELAA, which was published only on 20th January 2023, includes a large number of sites that were not in the update, and which have been rejected, yet the WBC process is that the HELAA is at the start of the process not

	<ul style="list-style-type: none"> The Air Quality Assessment that is part of the consultation documents is based on the LPR running to 2037, n This affects the traffic levels forecast for the end of the LPR period and the resultant traffic pollution. There is no evidence WBC has complied with its legal duty to cooperate with Berkshire West Clinical Commiss of the GP surgery promised for north east Thatcham. There is no evidence that WBC has consulted properly with Thames Water over the time needed for provision therefore does not know if the houses for north east Thatcham are deliverable in SP17 in the plan period. The Settlement Boundary background paper shows the Thatcham settlement boundary already extended to the houses, yet the plan now refers to a minimum of 1500 houses – this could be read that 2500 dwellings is still sui the extended boundary. The new provision for secondary schools in north east Thatcham is not consistent with WBC guidelines for the m school. If the primary provision is 2.5 Forms of Entry, then so presumably is the secondary provision to meet th Council policy 2013 states that the minimum viable size for a secondary school is 4 Forms of Entry. The Secretary of State's Written Statement of 6th December 2022, which removed the need to maintain a 5-ye Authorities with up-to-date Local Plans, removed top-down housing targets (particularly for Local Authorities w and gave a two-year transition period for LAs in the final stages of preparing Local Plans and this statement sh WBC. <p>Because of these points, and many more, the Reg 19 Submission in its entirety should be considered as unsound. I would very much welcome the opportunity attend and speak at the Reg19 review.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	<i>WBC have conducted the bare minimum of consultation as required by law where they deem fit. The revised HELAA w NE growth study should legally have been consulted on. On that same document other developers were not given th funding and so on.</i>
4. Proposed Changes	<i>That is surely WBC's job ?</i>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pratt, Ian
Consultee Full Name	Ian Pratt
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS315
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 18:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer

WBC LPR Regulation 19 Objection

I wish to strongly object to the SP17 proposed development of 1500 houses in NE Thatcham on the following grounds:

Traffic

There is already substantial traffic passing through Thatcham in the rush hour, along both the A4 and Floral Way. This proposed development will increase the number of car journeys as people travel to and from work, as it is unlikely that there will any new employment opportunities created locally as a result of this proposal.

For traffic that wishes to join the M4 at Junction 13 (Chieveley), or head north on the A34, people will not follow the A4 to Newbury, and it is likely that these traffic flows will instead be up Harts Hill, into Upper Bucklebury and through the surrounding villages ie Cold Ash and Hermitage. It is likely that there will also be increased traffic through Chapel Row and Southend Bradfield, as cars look to avoid the A4 going eastbound to the M4 at Junction 12. These roads are generally winding country roads with no footpaths and are not designed, or have the capacity, to handle the additional traffic, leading to the potential of serious accidents particularly with walkers and cyclists. The inclusion of an access road and car park from the development directly onto Harts Hill will only encourage traffic to avoid the A4, and create more rat runs through the villages to the north of Thatcham.

For traffic that wishes to go south towards Basingstoke and Winchester (greater employment opportunities), then this will flow over the already congested Thatcham level crossing, where traffic regularly queues for 10 mins or more today when the gates are closed. The result will be that the queues will only get worse with more traffic, which will have a significant impact on air quality as engines are left running whilst stationary and queuing.

There has been no (or limited) modelling of what the traffic impact on surrounding villages will be as a result of this development, nor will it improve safety or encourage people to walk or cycle. Neither is there anything in the plan to encourage the use of public transport or use of Thatcham railway station, which is probably too far for people to walk to. Also, there is very limited car parking available, particularly on the north side of the railway line.

Environment

This development is on a greenfield site and will result in the loss of agricultural land. Brownfield sites should be developed first, before destroying agricultural land and a valuable wildlife habitat. There is nothing in the proposals that will enhance the ecology and biodiversity of either the actual site or the surrounding countryside and will actually have a negative impact. The proposed site is adjacent to AONB land, and Bucklebury Common is already suffering from damage caused by 4x4's and off-road motor bikes. With an estimated 4000 residents that will need access to green space for exercise and recreation, there is the strong possibility that Bucklebury Common will become a 'playground' and the fragile eco-system will be permanently destroyed.

There is no detailed information on how the proposed 'community parks' will either enhance or protect the biodiversity of the surrounding countryside, and will probably be just a grassed area with a few trees, and will not replace the natural habitat that will be destroyed.

There should be a strategic/defined gap between Thatcham and Bucklebury to protect the rural identity of Bucklebury, as WBC have put in the plan for elsewhere. Should this development go ahead then the remaining gap will become so small that Upper Bucklebury will eventually become a suburb of Thatcham.

There has been little work done to identify the impact on wildlife and species that will be affected by the development, and so it is difficult to see how WBC can state that there will be a positive impact to the environment. As they haven't identified what is there today, how can they mitigate against it and say that there will be a positive environmental outcome?

Infrastructure

One of the claims of WBC is that there needs to be a large single development to be able to provide and fund the supporting infrastructure that will be needed to cater for an increase in population of 4000 inhabitants. Primarily this should fall into the following 3 areas of infrastructure provision:

a) Public Transport – there is nothing in the proposal that will increase the provision, or improve the use of public transport, and it is likely to just increase the use of private cars and all the issues that this brings regarding safety, congestion and pollution.

b) Healthcare – existing GP practises are already at capacity, and there is already insufficient dental care available within Thatcham to support the current population. There is nothing in the proposal that will address dental care provisioning, nor GP services, apart from offering a small site to the local health authority in the hope that they will do something with it. There has been no discussion or consultation with the local health authority to see if this will be a viable option, both from a practical and economic point of view for delivering health care services within Thatcham.

c) Education – there is no coherent strategy in the document on how education is going to be provided from early years through to 6th form. There are vague statements such as 'the site will provide Early Years provision' but no detail as to when it will be provided, and in what form it will take, so it is impossible to understand if the provision will be adequate or sustainable. For secondary education there is just the statement that a sum of £15M will be provided by the developers towards secondary education. There are no details provided as to whether this is going to be a new facility, where it would be located, or if the money will be spent improving the existing secondary schools in Thatcham, where there is little space for additional capacity at Kennet School. Without a clearly defined plan for education facilities there is a high probability that houses will be built long before there are any new educational facilities to support the increased population.

Alternative sites

There are many brownfield sites within West Berkshire that could be developed, and the cumulative sum of all these smaller developments would meet a significant proportion of the new housing requirements for WBC. In particular there is the Colthrop proposal which would develop an existing brownfield site, and would also have the benefit of providing a bridge over the railway line at Thatcham, which will bring a significant improvement to the congestion and pollution that exists

	<p>today at the level crossing. For reasons unknown, WBC have ignored any requests to look at alternative housing provisions and seem intent on dumping a minimum of 1500 houses on the edge Thatcham on a greenfield site.</p> <p>In summary there is very little supporting documented evidence to demonstrate that WBC have considered the detrimental impact the SP17 Thatcham NE development will have on both Thatcham and the surrounding villages and countryside.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Wright, John
<p>Consultee Full Name</p>	Mr John Wright
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS627
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	01/03/2023 16:17:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to lodge my objection to the above proposal given the size of the development and its impact on the village surrounding area.</p> <p>Of particular concern is the impact this proposed development will have on the environment. The northern boundary AONB which includes areas of ancient woodland and common land that would be adversely affected by the increase in traffic. During the recent pandemic and lockdown, the village was subjected to significant evidence of trespassing and problems and I fear that this would increase if this development goes ahead. The spectacular views across The Kennet Valley will be lost forever by this development.</p> <p>A second, but equally important, problem will be that of the increase in traffic. The road through Upper Bucklebury and the villages are already subjected to motorists using them as a means of avoiding the A4 and accessing the A34 and M4. If this development is approved particularly the plan for an exit at the north of the site onto Harts Hill Road. Traffic leaving the site is going to go in the direction of Upper Bucklebury where it will split between traffic going through Cold Ash and traffic going through Chapel Row. The roads through these villages are ill suited to additional traffic: they are rural, single carriageway roads with narrow footpaths, which would constitute a serious safety hazard given the anticipated increase in traffic. The impact of noise and increased traffic will be significant.</p> <p>When Floral Way was constructed it was meant to constitute an important boundary between Thatcham and Upper Bucklebury to break that strategic gap and result in the loss of the village's identity as a rural community. Bucklebury Vision set out a plan to protect the landscape and the visual quality of the area should be maintained. This proposed development seriously undermines that vision.</p> <p>What will future generations think of us if we desecrate this greenfield site with all the ramifications that it will have on the landscape? The system is meant to protect rural environments and the increasing awareness of the importance of such areas in the landscape is even more important that these valuable sites are not destroyed. Once under bricks and concrete they will be lost forever.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Davies, Steve
Consultee Full Name	Steve Davies
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS313
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><u>Thatcham Northeast Development</u></p> <p>-</p> <p>There is nothing that recommends this development to me. Any decision on the WBC local plan should be delayed until so that the people of West Berkshire can decide who is best placed to deliver what they want. If you state that this is the people of Thatcham should have a referendum on the major changes proposed for our town. I have lived in Thatcham more than 35 years, and have seen very little improvement but never-ending housing development.</p> <ul style="list-style-type: none"> • Thames Water continues to discharge huge amounts of untreated sewage into local waters and fails to adequately maintain infrastructure, resulting in record fines and hose pipe bans. Why is this not a stopper for the Thatcham NE development? • The Thatcham NE (TNE) estate houses will likely be built with few concessions to progress, the local population will have gas boilers, no solar panels, tiny gardens (if any), poor drainage, awful roads, inadequate parking, poor street landscape. Will there be additional maintenance charges to residents to support complex drainage and water services with another local development (18/00964/FULEXT)? • Look at the Kennet Heath estate to see the end product of 21st century housing development, i.e. no front gardens, traffic issues and anti-social behaviour as a recent bonus. • One should argue that the proposed TNE site is an AONB even if not so designated. It is a beautiful area (unlike the town centre). • Getting in and out of Thatcham at peak hours is already a time-consuming exercise. I think that the A4 should be widened and by-pass with some significant improvements. This would help through traffic. • The town centre needs a revamp, businesses are closing (chemists, banks, pubs, restaurants and more) and footfall is low. Land that could have been used to enhance the town centre's environmental facilities has been taken up by large residential apartments. These should have been built in AONB areas and not noisy town centres. • Medical provision is poor with residents having to travel to Basingstoke or Reading hospitals to obtain treatment (even though GPs claim is necessary). Newbury has a hospital, but this fails to serve the needs of the local population. Why not use the North Hampshire Hospital in Basingstoke rather than the Royal Berkshire Hospital (n.b. not a difficult option)? • Crime appears to be getting worse, or at least social media seems to suggest this even if the statistics are mixed. There are a lot of daily reports recording stolen cars, stolen bikes and burglaries. • Thatcham requires a bridge over the railway. It has done for many years. I worked in Basingstoke until recently and I know whether you could use the crossing. Most days I would travel through Brimpton, Baughurst and Ramsdell but not through Silchester and Bramley. There is no public transport from Thatcham to Basingstoke.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Allison, Piers
Consultee Full Name	Piers Allison
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS277
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 18:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing re your WBC Local Plan review 2022-2039.</p> <p>I object to your plans for 1500-2500 new houses, to be built on green fields, adjacent to the North Wessex Downs AONB.</p> <p>I am prepared to appear at the public inquiry if invited.</p> <p>I object to your plan. The plan will all but join Thatcham to Bucklebury, thereby connecting a village within the AONB, which will damage the character of Bucklebury, result in increased damage to Bucklebury Common, increase usage of Bucklebury Common and damage to the River Pang. The development will not support your own vision and strategy to protect the AONB, and damage to the River Pang. The development will not support your own vision and strategy to protect the AONB, and damage to the River Pang. It will degrade the AONB, so that it becomes an Area of not quite such Outstanding Natural Beauty.</p> <p>I wish in particular to object on the themes of the Environment and Traffic.</p> <p>All page numbers of reference numbers that I have used in this objection, relate to your document "West Berkshire Local Plan 2022-2039 Proposed Submission".</p> <p>THE NUMBER OF HOUSES REQUIRED IN THE OVERALL PLAN</p> <p>You have established your housing requirement that has been:</p> <p>-“informed by the local housing need (LHN) conducted using the standard method in national planning guidance” (1.4.5)</p> <p>-“The local housing need (LHN) conducted using the standard method in national planning guidance. The LHN for West Berkshire for the year 2022, using a 2022 base date.” (4.5)</p> <p>But as you also point out</p> <p>-“West Berkshire contains a number of physical and environmental constraints which influence the location of development” (1.4.5)</p>

However WBC has not used the physical and environmental constraints to challenge the standard method used in national planning, instead to recommend to central Government that 2 WBC should use have a smaller housing requirement that does not take into account environmental constraints.

Instead you have chosen to press ahead with the standard method used in national planning, with the impact on the result.

I object to the fact that the Council has not proposed to use a non-standard method for planning the number of houses in the Local Plan, that might take into account the physical and environmental constraints within West Berkshire.

IMPACT TO THE ENVIRONMENT, IN PARTICULAR TO THE NORTH WESSEX DOWNS AONB

1. AONB protection

WBC wishes "Together with partners, to continue to conserve and enhance the North Wessex Downs AONB" (3.5, b)

You point out that "The primary purpose of AONB designation, 'to conserve and enhance the natural beauty of the area and Rights of Way Act 2000". (4.24) and that "Under Section 85 of the Countryside and Rights of Way Act 2000, the primary purpose of designation" (4.24)

You state that "As a nationally valued and designated landscape, the North Wessex Downs AONB will be conserved and its national status and this is set out in Policy SP2." (5.38)

Any development of 1500-2500 houses, within a few hundred metres of the AONB, will clearly not enhance the AONB's duty (under Section 85 of the Countryside and Rights of Way Act 2000) to support the AONB's designation to conserve and enhance the area.

By planning for a new development of 2500 homes, up to the very boundary of the AONB, you introduce the high risk of noise, air pollution and strategic objectives. The population of the extended Thatcham will overspill into the Bucklebury area of the AONB, damaging 4x4 traffic on Bucklebury Common, put more cars into the narrow single track lanes that wind down from the ridge into the Pang Valley, send more people down to the recreation ground and playground in Bucklebury Village, and 'play' around Bucklebury Ford and who litter the River Pang.

Within your section on development INSIDE the AONB (Policy SP2), you write:

"If the proposal is considered to be major development, then the second part of the policy will apply and the following factors will be taken into account:

-Detrimental effects on the environment, including wildlife and cultural heritage..." (4.28)

Your Policy SP2 applies to development within the AONB. It should equally apply to development almost adjacent to the AONB, as residents will overspill into the AONB. Whilst the houses can't move, the people will.

Your plan for 1500-2500 homes almost adjacent to the AONB will not conserve or enhance the AONB. It will clearly damage the AONB and will probably produce some environmental 3 assessment that suggests otherwise – but such an assessment will clearly show that no houses in the area that you propose for North East Thatcham will clearly be better for the AONB than building 1500-2500 houses to the AONB.

2. Protection of Rivers in the AONB

In "Our Vision", the Council stated that "Development will no longer contribute to the pollution of our air and water sources and aquifers" (3.3).

In your "Habitat Regulations Assessment for the Proposed Submission (Regulation 19) Local Plan Review (November 2019) you state that "treatment works" (4.26) and state that "There are no Habitats Sites within the Upper Kennet and River Enborne catchment areas, so there is likely to be no impact from the proposed development." (4.26).

You state that "Special consideration needs to be given the Rivers Pang and Lambourn which are groundwater-fed catchments and hydrological systems, supporting diverse, rare habitats." (5.65)

And then claim that "The Council will work in partnership with the local community, statutory advisors, developers, landowners and others to identify and prioritise areas which will provide the best opportunities to protect, maintain and enhance the District's 'multi-functional' green and blue spaces and other natural features." (5.66)

But you have provide no plan or evidence on how you will stop the residents of the 1500-2500 new houses, on the development from damaging the river.

Again, your plan will be detrimental to the AONB.

Only a few weeks ago, I had to report an Environmental Incident to the Environment Agency, when a car leaked its oil into the River Pang Ford. If there are 5000 more people, living within 2 miles of the River Pang and Bucklebury Ford, there will inevitably be more incidents.

3. Protecting Dark Skies in the AONB

You state that "The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, is a key feature of the AONB (Policy SP2).

You state that the North East Thatcham Strategic Site will have "A Lighting Strategy which will include consideration of the impact on the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity" (Policy SP17).

Through sections 10.45 – 10.48 you lay out requirements for lighting controls that should be applied by any development to produce more light pollution at night, no matter what controls you endeavour to put in place.

Thus this development will not preserve the dark night skies, within the neighbouring AONB. It will degrade those dark night skies.

Again, your plan will be detrimental to the AONB.

I object to the fact that the Council is proposing to allow the building of 1500-2500 houses, on a greenfield sites almost adjacent to the North Wessex Downs AONB.

IMPACT ON TRAFFIC

	<p>If you build 1500-2500 houses between Thatcham and Upper Bucklebury, it will increase traffic on the road that runs through Row, Bradfield Southend and to the dangerous junction of Common Lane and the A340 (on the corner of Englefield Road). You cannot control where people drive. There will be 2000 or so more cars on the road and some will head north out of Thatcham. This will push more traffic into the North West Downs AONB, onto rural roads that are inadequate and have no pavement. We will mitigate the obvious increase in traffic with larger roads as that would be detrimental to the AONB.</p> <p>You have produced no modelling to suggest that this increase in traffic will not occur. If you had such modelling, it would show that houses, will cause more traffic.</p> <p>I hope that instead of your proposed plan, that you will:</p> <ul style="list-style-type: none"> - Develop a plan that requires fewer houses, taking instead into account the physical and environmental constraints - Not build on green fields, but instead have a plan that has multiple brown field developments; - Not build almost adjacent to the AONB.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Dalgarno, Paul
<p>Consultee Full Name</p>	Mr Paul Dalgarno
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS641
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p>	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	27/02/2023 20:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing this letter to raise my concerns and objection to the proposed development of NE Thatcham due to the the local area.</p> <p>Environment</p> <p>I am concerned that a development of this size and scale in a single location would have a number of negative environmental impacts.</p> <p>Flooding : a development of this size with the proposed amount of hard surfaces, would inevitably increase the amount of runoff and cause flooding.</p> <p>Nutrient pollution : I am concerned that a development of this size would have an impact on the River Kennet by increasing the amount of runoff by the additional Rainwater runoff, and by the additional</p> <p>Sewage created by the increased population. It have been reported in a number of occasions that river kennet is already struggling. local sewage works have on a number of occasions been overwhelmed and this development is very likely to significantly increase the amount of sewage. I understand that the river kennet in this area is not a Special Areas of Conservation, however, it is a Chalk stream and therefore has a high level of protection from significant developments.</p>

	<p>Traffic</p> <p>As a local resident and commuter to a local business, I am regularly stuck in traffic queues heading into Thatcham through Bath Road / Pipers Way roundabout, I believe that this many houses in a single location given the local infrastructure causes traffic and inevitably cause an increase in traffic pollution and a reduction in air quality.</p> <p>I am also concerned that this traffic would inevitably push traffic onto the smaller single-track roads around the local pavements and offer little protection to pedestrians given the expect increase in traffic and likelihood of frustrated drivers on the excess traffic.</p> <p>I am concerned that West Berkshire council have appear to change their position on developments of this nature have a smaller proposal for amongst other reasons the following : <i>“The council also said that Siege Cross would erode the surrounding rural settlements, while producing clear and demonstrable harm to the landscape</i></p> <p><i>Having read the West Berkshire Council proposal I do not believe that it is ‘Sound’ and is little more than a sales pitch without assessing all the local options</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Anderson, Bob
<p>Consultee Full Name</p>	Bob Anderson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS328
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS</p>	E-Mail

* Web * Unknown	
Response Date	24/02/2023 11:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I wish to register my objection to the proposed development on the following basis that it is unsound for the following</p> <ol style="list-style-type: none"> 1 The proposed development is in an area of OSNB 2 The traffic movement on a mean average of 2000 properties based on 1.5 cars per household doing two journeys per day creating additional poor air quality. 3 The additional traffic movement via Upper Bucklebury and Chapel Row would significantly increase in what are busy roads. 4 The current NHS provision is inadequate with no agreed additional provision 5 Dental practises are unable to currently offer a 100% service to existing residence. 6 The current public transport is of poor quality and could not cope with additional pressure 7 Brown field sites should be the default option not green belt with the loss of habitat from wild animal birds etc. 8 The provision of this development has taken no impact on the common at Bucklebury which has ground nesting birds being pushed to the ever decreasing borders of mankinds expansion, with the addition of circa 8000 additional residents. 9 The proposed development makes no mention of road update improvements to cope. 10 The current school provision is already under pressure <p>Conclusion, WBC needs to listen to it's current residence in these situation and the impact on there quality of life, rather than what we want. If we don't care what you think. You are not our masters ! and need to stop thinking that you can do what you like without regard for the community. We need a true democracy (Although I sometimes wonder) so therefore you need to listen to what is being said to you!</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Higgins, Glen
Consultee Full Name	Glen Higgins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS273
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 14:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>On the North East Thatcham plan for a very large housing estate, my particular objections are:</p> <p>There will be increased traffic through Upper Bucklebury and Chapel Row and a problem at the junction on the Pangbourn road proposed a new roundabout on the narrow Harts Hill road to allow traffic in and out of the northern end of the development on Harts Hill; this will cause additional congestion on the A4. Cold Ash will see a large flow of traffic going towards Chiseldon which is a narrow and many do not have pavements; cycling would not be safe.</p> <p>There is insufficient capacity at Kennet school (oversubscribed) and no other plan has been made. School provision in the area and facilities on such a gradient have not been costed.</p> <p>On Wildlife: Bucklebury common would be subjected to an increased number of visitors and the delicate ecosystem would be damaged. There is no evidence of or any strategy for increased biodiversity. A "country park" mentioned in the plan does not meet the criteria. The three small areas inside the settlement boundary are not of any proper environmental value, some "wildflower meadows", nightjars or great crested newts.</p> <p>The strategic gap between Thatcham and Bucklebury; Upper Bucklebury will lose its identity when Thatcham and Bucklebury developer in Cold Ash has just been refused permission for this reason.</p> <p>Medical provision: additional GP surgeries are not part of the NHS strategy for the future. No local surgeries have the space for a surgery of 450 square metres as suggested.</p> <p>Number of houses: Initially 2500 houses were to be built in total, 1250 in the plan period. This has now been increased to 3000. Any mitigation of the impact of the development should be largely completed before sales however what normally happens is that poverty and delays this work until the site is largely complete. The developer will wish to utilise the area originally designated for 1000 after this LPR plan period finishes.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hallahan, Lindsay
Consultee Full Name	Mr Lindsay Hallahan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS428
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 11:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to you to submit by objection to the proposed development of 1500-2000 houses in NE Thatcham. I have lived in the area for nearly 5 years. I moved to the area making a significant personal investment in the area so that my family could enjoy a good environment, green spaces and support the local community. The mental health of my family and specifically my young children, since COVID, has been improved due to the green spaces and wildlife of the area.</p> <p>Wildlife particularly roam freely in our garden and local area (Deer, Pheasants, Hares, many birds, foxes, badgers etc).</p> <p>I believe this proposal and planning application to be unsound based on the below points.</p> <p>Transport</p> <p>The increased traffic that would result as a direct impact of the proposed development, will significantly negatively impact the area. The road exit at the north of the proposed site onto Harts Hill will exit in one direction towards Upper Bucklebury and then split onto Chapel Row. These roads are country roads and wholly inadequate currently, never mind with a considerable and increasing volume of traffic that will come with the development. This is Unsafe. There is already unacceptable level of traffic accidents. The transport and planning committee has shared no modelling results for the Harts Hill Road exit - Why Not? There are drawings for all other areas.</p> <p>This will also have a negative impact on the ability to Walk, cycle in the area. Cars travel too fast and the roads are narrow and unsuitable for a higher volume of cars providing a safe environment for walkers and cyclists.</p> <p>HealthCare</p> <p>The massively overstretched NHS GP and also community and Acute facilities is well documented. The proposal submitted to the integrated care board but no details or insight was shared about what exactly this would look like. Whether the proposal would be considered fit for purpose for the community and how this has been shared and discussed with the local health board. The details of these discussions - where can the recommendations and conclusions be seen in the proposed plan? It is of great concern that the details are not available from WBC or the developer. The demographic of the community affected here desperately need access to health care now and in the future. As per the figures available from NHS digital, it is highly unlikely that any additional GP practices will be provided. It is shocking that no local GP surgery has been approached by WBC or the developers to discuss the proposal and plan. The local GP practices are massively overstretched. Approximately 27,800 patients which equates to just under 2000 patients per GP practice. The number of homes being built and introduction of more young families to the area this continues to grow. It is not sustainable. The local GP practices who are currently unable to meet the demand and patients having to travel often large distances to get their GP appointments.</p> <p>Environment</p> <p>1 Collateral damage to the Bucklebury Plateau Biodiversity Opportunity area and its ancient woodland and heathland.</p>

	<p>2 Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB the open countryside by local communities</p> <p>3 Casuing detrimental impacts to legally protected wildlife known to be present on the sites.</p> <p>From a review of the documentation on SP17 there is nothing to support the claim that there will be a positive impact on the environment. In fact the opposite is true. Nor is there evidence of documentation to support the Sustainability Charter or its existence. There seem to be no proven plans on how the development will provide green spaces which will mean increasing stress on these fragile eco systems. Where is the evidence to support the claims that there will be an overall positive impact on the environment?</p> <p>Education</p> <p>There is no clearly defined plan on how education will be provided to the increased population and the existing residential population. There are approximately 4000 new homes and approximately 4000 new school places needed based on 2 kids per household, where are the additional schools provided? Clearly if any new schools were to be built that has additional impact on traffic and other local resources. There are already schools that are oversubscribed today without the increased burden. There was no current predictive future modelling to anticipate the additional future resources required.</p> <p>WBC has a duty of care to provide education needs are met across all school years - this is not defined in the LPR.</p> <p>In addition, there is a need to provide school fields on flat ground and from the proposed area the only suitable area is the proposed area. There is a clear air quality issue for the young children using it. This has not been met - where is the evidence for funding or suitable land?</p> <p>Based on the above points, I would like to register my objection to the LPR Regulation 19 objection.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Saunders Family (Represented by Southern Planning Practice)
<p>Consultee Full Name</p>	Saunders Family
<p>Consultee Organisation</p>	Saunders Family
<p>Agent Full Name</p>	Alice Drew
<p>Agent Organisation</p>	Southern Planning Practice Ltd

Comment ID	PS244
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Previous comments were not made on this allocation. Whilst it is appreciated that this allocation is strategic, it is very provision of this site has reduced from 2,500 dwellings to 1,500 dwellings. It is unclear why this has happened – was fully assessed as part of the Regulation 18 consultation document.

	Such a dramatic reduction in housing provision highlights that there is a need for further, less complex, small-medium Local Plan.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Carwardine, Jane
Consultee Full Name	Mrs Jane Carwardine
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS625
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/01/2023 20:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>. Transport</p> <p>Roads: the roads around this area of Thattham are already extremely busy, and this number of houses will massive the evening rush hour, traffic regularly queues from the eastern side of Woolhampton to Thattham, which will become commuters is increased. The building of these proposed houses will lead to an increase in traffic through the surround Bucklebury and Cold Ash - in the case of Cold Ash traffic will increase on the roads past St Marks and St Finian's so impassable during school drop off and pick up times, so an increase of traffic would have catastrophic effects. The roads maintained, so an increase in traffic would result in a further degradation of the road surfaces.</p> <p>Rail travel: there are already insufficient parking spaces at Thattham station and a further increase in the number of cars being parked in residential areas in Thattham which has road safety implications.</p> <p>1 Healthcare</p> <p>To the best of my knowledge all the local surgeries are full so it's unclear where the new residents would go. I realise that but given the challenge in recruiting/retaining GPs I have low confidence that this would actually happen. The negative impact at the West Berks Hospital would also be significant. I would like to see the Health Impact Assessment for the proposed development.</p> <p>1 Environment</p> <p>I am at a loss to understand why WBC would think it acceptable to develop a greenfield site when there are many brownfield sites developed first, e.g. Kennet Centre. Parts of the site have been subject to flooding previously and it's not clear that plans given to the unintended impact in terms of water management. The construction of so many houses will inevitably impact the surrounding area, and to suggest that the overall environmental impact is either neutral or positive is highly misleading.</p> <p>1 Education</p>

	<p>There is no information on how early years education would be accessed. Primary education is already a challenge having to travel miles to get to their designated primary school. It's again unclear about how primary education would be funded - money to the developer would not be acceptable - and clearly schools need to be built and established before the high school/secondary education, I feel the contents of the plan are unsound. It is believed that the numbers of secondary age children required to necessitate a new secondary school being built, but it is unclear where the secondary age children are coming from - also result in a reduction in choice for secondary age children in the surrounding villages who can currently choose between several Schools - as presumably these children would all have to go to the Downs.</p> <p>1 Sports fields - with that many people living in close proximity to each other, it will be important to create a sports field - not clear where that would be as it usually requires flat ground which is in short supply in the proposed area of the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Allum, Jason
Consultee Full Name	Jason Allum
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS456
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	01/03/2023 10:46:00
Attached Files	Jason Allum photos.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I have taken a considerable amount of time to read through the Proposed Local Plan and the remarks below superfluous housing development to which I object as I find it unsound.</p> <p>Although we all understand the necessity for new housing it needs to be a considered approach and take into account the impact on the environment within the local area. This is why I strongly disagree with the proposed allocation of 1,500 - 2500 dwellings (actually 1,500) for the North East Thatcham development.</p> <ol style="list-style-type: none"> 1 There is absolutely no evidence to support WBC claims that SP17 will have a positive impact on the environment. This is a claim. There is no habitat survey or environmental study on the biodiversity. How can a council report there is no study or evidence-based survey on the existing or background study? This fact alone makes the environmental impact statement fit for purpose. As part of the objections to SP.17 Bucklebury Parish Council complied a biodiversity study of the site. It would cause a significant loss of habitat and identified may endangered species, seven of which are on the red list. Evidence of bat activity, badgers, Western Roe Deer, fox in the adjacent woodland and hedgerows to the site. The council support fresh water shrimp and other important creatures including Newts. Why was this not picked up during the consultation that WBC had to prepare their report? 2 The existing hedgerows in particular are vitally important as green infrastructure and wildlife corridors that attract biodiversity. The plan identifies this in Paragraph 179 of the framework but there is not strategy detailed as to how these are to be saved. 3 The council supposedly supports the creating of strategic gaps and keeping village identity and the proposal . The plan does not identify how these actual and perceived visual breaks remain important for the continued retention of the existing settlement.

If this is fact then why is the current proposal contra to this policy. It is important to keep the strategic gap between T also relevant to the other developments for example at Benham Hill otherwise the entire of this area become one mo completely loses the character of individual settlements.

- 1 The original Thatcham Growth Plan issued by WBC had provision for two Country Parks. This has been subse to undefined "community parks". The LPR actually states to facilitate connection to the AONB. As I am privileg Common Stewardship Scheme and the Chair of the Bucklebury Commoners Association, I confirm that we hav proposal and its potential impact.

We can confirm that the increase footfall during and after Covid 19 and a very negative effect on the biodiversity of B putting pressure on a number of endangered species, including Woodcock. We are working very hard to preserve, m heathland in the AONB. This area is very special, sensitive habitat and a refuge for Adders (Common Viper), Stonech Nightjars are of which are under threat. The Common is private land but the landlord grants access to the general pub There are no mitigating parameters within the SP.17 to prevent a very negative biodiversity imbalance. There is a rea x 4 and trails bike traffic will also increase.

- 1 The visual impact on the AONB will be enormous, especially when viewed from Greenham or the higher grou Reading through the report there is some confusion and ambiguity on which levels are consider acceptable. M actually exceeds the 100 m contour especially around Harts Hill and towards Long Grove Copse. We have bee that the development will all be below 100 m. This is false. It will be imposing for the existing residents and be actually looked at this vista will have noted the Henwick Driving range and this is noted at being at 90 m. The n be at this level and above – highly, highly visible. We raised this question during Regulation 18 and the respons the developer's masterplan. To avoid this issue is just unacceptable and again raises the question of soundnes
- 2 Thinking of the precedent that it sets, it is interesting to note that the Planning Inspectorate dismissed an appe the North West Downs Area of Outstanding Natural Beauty as it would have had a significant impact on the ANO green gap which makes a significant contribution to the rural setting.. and cause irreversible harm to the intrins was made on 26 dwellings imagine the impact of 1,500 -2,500 and the subsequent infrastructure required.
- 3 Traffic – I raised a number of questions under Regulation 18 on the matter of the increased traffic and its effect The answer cited is naïve. "Highway works and active travel routes would assist in directing residents to using Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train stat

I cannot believe WBC officers actually think that drivers will turn left into congestion if they wish to go East/West for the to join the A34 north/south.

This is just unrealistic and any proposal should be supported by detailed modelling. Traffic going north will transit up through Cold Ash putting enormous pressure on struggling system. The area of Burdens Heath (Bucklebury) will be s this is an existing 30 mph zone, traffic leaves the village anywhere between 40-60 mph (we have the data).

Those drivers going west for the A4 and M4 will just drive straight through the parishes of Bucklebury, Bradfield and congestion at the dangerous Theale crossroads which is an accident blackspot. The general public are in love with th persuaded onto public transport. I formerly invite any WBC officer to come and discuss this matter in person using the and the enhanced cycling/walking network.

- 1 The local plan also identifies an aviation pipeline on the south of the site and a gas pipeline at the north. Both o size of the potential development and create problems with easement. There is no detail on how developers ar especially access into the SP.17 site from the south.
- 2 The Harts Hill Road is a notoriously dangerous stretch of windy road (We recently had three accidents in one new access route into the site from this road is profoundly unsound

10. Foul Water

Current Synopsis

Thatcham, Newbury and the surrounding district is served by Thames Water's Sewage Treatment Works (STW) in L is fed by two sewers (Dia. 18" and Dia 15") running from Faraday Road to Lower Way that are in poor repair and ove the combined flow of sewage and surface water from the older areas of Newbury as many of the properties have con pumping main that runs from Turnpike, serving that area with a pumping station at Benham Hill. Another sewer runs fr Road, Thatcham is gravity fed from all the current estates in the north development of Thatcham and the town centre

This facility also has to accommodate all the smaller village septic tank systems, tinkered into Lower Way, and comm

Currently there are 600 new houses being constructed near Vodaphone, 167 new flats at Boundary Road (Ex-Sterlin the Tesco Supermarket (Retail Park), and 100 houses with planning approval in Lower Way. In total 1,024 properties development (say, an additional $1024 \times 300 = 307,200$ litres/day). The current NE Thatcham20 proposal (SP17) add (minimum), (i.e. $1,500 \times 300 = 450,000$ litres per day).

The current system at Lower Way has a maximum intake capacity of about 600 litres/second. If the input figure is in exo occurs, the combined flow is fed into two overflow tanks. The regulated input is fed into Fermentation Settling Tanks (with percolating filter. If these are over capacity, or if the overflow tanks are full, the untreated effluent is delivered dir

Regulation 19

There is no mention of how the infrastructure is going to be improved with regards to this foul water requirement. The litres per person per day; assuming an average of two persons/household, adds an additional 450,000 litres/day from that has to be treated at Lower Way. This does not take into account any surface water that might have been connect buildings and amenities, or any other necessary infrastructure and, more importantly, the above additional input from r excludes the additional 1,100 dwellings built recently at The Race Course (330,000 litres/day).

The TSW at Lower Way, has reached its design capacity, and apart from the sites listed above will also be required to sites designated: RSA1 to RSA7, RSA 9, RSA17 and RSA 22.

Without the necessary infrastructure the proposed housing development in NE Thatcham, SP17, is ill- considered and ur damage (as the Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) on the outflow will certain earth it is very apparent that there is very little room for further expansion on the site. There may be room for an add only act as additional attenuation and not mitigate the risk of pollution into the Kennet.

If this outdated plant cannot cope with the increase in flow, then the operators have no option other than to increase levels at the outlet into the River Kennet.

This will exceed the permitted percentile limit set by the Environment Agency (EA).

This completely contradicts the Water Framework Directive cited in Regulation 19, for the improvement, restoration and protection of water bodies. Please note that much of the drinking water supply for Reading comes from this source and is abstracted at Fobney, STW and the proposed developments. The similar treatment facilities at Kintbury and Hungerford also discharge into the Kennet during peak flow period.

West Berkshire Council has identified the requirement, it is mentioned in 5.63 of the Infrastructure Development Plan. 5.63 The Study indicates that “new homes require the provision of clean water, safe disposal of wastewater and protection of large numbers of new homes in certain 35 locations may result in the capacity of existing available infrastructure to be exceeded, which could potentially cause service failures to water and wastewater customers, adverse impacts to the environment, or health and safety issues, and wastewater assets being passed on to the bill payers.”

Conclusion

If the problems above have been clearly identified by WBC, surely no planned development should be considered until a full investigation is carried out and a solution prepared. The existing sewers and infrastructure feeding Lower Way are real matters for the council to consider, the method of repairing or replacing this Victorian system, short of excavating the A4, one of the main arterial roads, which is a massive task to be carried out.

There is absolutely no doubt that the existing infrastructures is failing. The evidence of extreme infiltration identified in the LPR is clear evidence that the pipework has lost its integrity. Recently an old section failed on the junction to Hambridge Road which was investigated by the Environment Agency but it will have resulted in surface and groundwater pollution.

The LPR touches only briefly on the subject of Sewage Treatment In Section DC.6 para e: “suitable land and access is required for the collection and treatment of water resources and wastewater, flood defences and drainage infrastructure”. There is no detail. Potable water bill payers and local councils need this information.

The Infrastructure Development Plan Control Policies states:

10.45 Developers will need to demonstrate that existing, planned and/or committed infrastructure is sufficient to accommodate the proposed developments. This includes demonstrating that there is adequate water supply, surface water drainage, foul drainage and on and off site to service the development. Necessary improvements to sewerage water treatment infrastructure will be required from service providers and companies and need to be completed prior to occupation of the development. This is to ensure that such infrastructure is sufficient to meet the impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and water.

In some circumstances this may make it necessary for developers to arrange for appropriate studies to ascertain whether the proposed development will lead to the overloading of existing local infrastructure. Where there is a capacity problem in the local network developers should be required to otherwise fund local infrastructure improvements.

If this directive is adopted and implemented by West Berks Council (WBC), any planning developments should not be approved until the information is submitted by developers and approved by WBC. This is a key clause and should be fully implemented. If the sewerage system is not improved and augmented it is impossible for developers to comply with WBC Policy DC.6.

The Local Plan Review does not mention any improvements to the existing sewage network or planning provision for the current proposal unsound.

1 Potable Water

Currently the water for Thatcham and the environs is extracted at Bishops Green and Speen. Sarah Bentley, CEO of Thames Water has stated that the current requirement per person per day is 150 litres. The increasing demand for potable water is having a significant impact in both the Kennet and Pang River valleys. The River Pang that runs through the villages of Bucklebury and the surrounding area completely ran dry again this year as a result of the reduced level of the aquifer.

In the past there are accounts of the river not running (1838 - Environs of Newbury), but this was during the first half of the year; a couple of months; and again briefly during the drought of 1976. In 2022 the river did not run for a considerable time for the first time in the very wet period in the autumn the river was still bone dry in

November and not really flowing until 9th December 2022. This devastating impact on the environment and the biodiversity at Compton and neighbouring extraction points and is in complete contradiction to the Water Framework Directive that requires that there are no suggested mitigation measures as this the sole responsibility of Thames Water.

The infrastructure plan, in sections 5.65 & 5.66, also points out this is a major problem:

5.65 Thames Water (TW) are responsible for supplying West Berkshire with water. The council identifies West Berks Council is under stress, in common with the rest of the South East. It comments that the more stringent water efficiency target for new developments under Building Regulations is justified, however West Berkshire Council may want to consider going further than the current target for larger strategic developments.

5.66 The WBC states that growth plans defined in Water Resource Management Plans (WRMPs) are broadly in line with the requirements of West Berkshire Council. “The WRMP does not predict a supply-demand deficit, except in peak or drought conditions over the WRMP planning period to improve resilience”.

This is an unsound judgment for foreseeing no predicted supply demand deficit, we are experiencing predicted extreme weather conditions, hose pipe ban enforcement for many weeks in the summer of 2022 which was lifted only on 22nd November, 2022. The infrastructure in Bucklebury and adjacent parishes is old and in poor condition and suffers from numerous bursts and leaks.

<for photos see attachment>

1 Flooding

UKCIP predicts a reduction in the overall annual rainfall but more frequent and intensive storms. The heavy storms in the winter of 2022 caused flooding that can occur off the hills surrounding Thatcham. The severity of storms will increase in nature and frequency.

Global warming will increase the amount of rainfall through as an increase in temperature, increases the moisture capacity of the air. To a psychrometric chart can make the calculation, for example, at 25°C with a RH (relative humidity) 60% the amount of moisture in the air is 10.5 g/m³. An increase of temperature to 30°C increases the amount of moisture to 13.5 g/m³ (12.5% increase in the air moisture capacity).

If SUDS and attenuation measures reduce the immediate impact the collective storm water this total flow will all come into the Kennet. SP.17 proposes 1500-

2500 dwellings plus garage, outbuildings, hard standings, car parking, pavements, roads or any infrastructure works such as roads, warehousing development etc. Even if this attenuation is mitigated locally, the problem is just shifted further downstream. This is irresponsible and in breach of current environmental protection policies.

	<p>Conclusion</p> <p>The area of SP.17 is bisected by the ephemeral water courses which is such a dominant geological and natural feature. The document actually states "There is a risk of surface water flooding within the site along the natural drainage routes based on evidence. The document however fails to identify the underlying rock strata of Reading Beds clays which predominates and provides evidence that who has carried out the standard percolation test on this material will substantiate.</p> <p>Already West Berks Council have spent a substantial amount of money in flood defences to protect the town but the road network penetrates these defences. The water will simply find the path of least resistance.</p> <p>Policy CS 16 states:</p> <p>Development will only be permitted if it can be demonstrated that:</p> <ul style="list-style-type: none"> • Through the sequential test and exception test (where required), it is demonstrated that the benefits of the development outweigh the risk of flooding. • It would not have an impact on the capacity of an area to store floodwater. • It would not have a detrimental impact on the flow of fluvial flood water, surface water or obstruct the run-off of groundwater. • Appropriate measures required to manage any flood risk can be implemented. • Provision is made for the long-term maintenance and management of any flood protection and or mitigation measures. • Safe access and exit from the site can be provided for routine and emergency access under both frequent and infrequent flooding. <p>It is unclear who will retain the overall design responsibility for the flood alleviation systems and their essential maintenance. We have identified and set the above parameters their proposal of building 1500-2500 dwellings, warehouses, roads and other buildings. The proposal contains no detail on how these vitally important measures are to be costed, implemented, maintained and managed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	I conclude that I will be prepared to give evidence at a public enquiry and clarify any details arising from the above.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	de Lara, John
<p>Consultee Full Name</p>	John De Lara
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS375
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 10:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The plan is unsound, rushed and not been subject to sufficient public or regulatory body consultation. Transportation: The local plan calls for a massive increase in the number of homes as part of the new town being proposed for north of Reading. This will all have cars that will need to leave the new town to travel to places of employment (Reading, Newbury, London etc). WBC have been very late in publishing their plans but funnelling a percentage of traffic to the country lanes of Harts Hill road and the surrounding area. In the document there are no studies or models to demonstrate the impact of this increased traffic or any drawings for the roads. In proposing this increase in traffic to the country roads of Upper Bucklebury, WBC are in direct conflict to their state of the art Environmental Assessment to increase safety and reduce accidents- how can increasing traffic volumes result in increased safety?

	<p>Consultation with ONR:</p> <p>Reading the local plan review WBC clearly have failed to consult with the ONR, as they should have as the developer of 12KM of AWE Aldermaston. In SP4, there are lots of words but nothing to say that WBC have done anything more than what is required (the comments are cut and paste from the ONR).</p> <p>Clearly there is a massive impact to the population profile and rather than read a website, I would have expected WBC to have consulted with the community. This clearly reinforces that WBC have rushed LPR 19 and not consulted with one statutory body, how many other statutory bodies have been consulted with? I believe that this lack of consultation demonstrates that WBC have rushed this consultation and have not taken the time to do the bear minimum.</p> <p>Consultation with Public:</p> <p>Between LPR 18 and LPR 19 WBC held no public consultation sessions, demonstrating that they are "hell bent" on their own agenda rather than discuss the proposed plans in public meetings creating a plan that is universally acceptable to the community. This has continued during LPR19 consultation period.</p> <p>The only consultation has been WBC publishing a 10,000 page document and expect the public to digest this and respond. WBC would have prepared public meetings, with summary plans, displays and community engagement.</p> <p>I believe that WBC haven't taken this plan to the community as they know it is unsound and would not stand up to public scrutiny. WBC have done the bear minimum.</p> <p>Environment:</p> <p>West Berkshire has a vast and varied environment with an ANOB contained within. The proposal's within LPR 19 include a new town north east of Thatcham, right up to the ANOB and this will have a negative impact on the local environment.</p> <p>The addition of 4000+ people, all wanting to enjoy the natural open spaces of Berkshire will have a negative impact on the local environment with increases use of the footpaths and woods. In the plan is a vague plan to have "country parks". These parks are difficult to create because of the contours of the land and will be to the developers advantage. Hence this plan is being led by the developer's environmental commitments.</p> <p>In SP 17 there is no evidence to ensure that this new town will have a neutral impact on the local environment, in fact it is clear that this new town will have a negative impact.</p> <p>Timing:</p> <p>WBC released LPR 18 consultation during Christmas 2020, at a time when the county was in lock down and this was not the best time to release LPR 19. WBC have always stated that they want to be a plan led authority, which is laudable, however they have not been a plan led authority in previous years. In December 2022 Michael Gove announced a major change to the volumes of housing that local authorities can build, yet WBC pushed forward with LPR 19.</p> <p>This reinforces my view that this plan is unsound and needs some serious rework to convert it into a sound and deliverable plan. It is my view that WBC should STOP this plan now and use the time to develop a sound plan during 2023 based on the new housing volumes.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	de Lara, Catherine
Consultee Full Name	Catherine De Lara
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS281
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 19:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Reason for objection:</p> <p>The plan is unsound, rushed, takes no account of the needs of the local population and has not been subject to sufficient consultation.</p> <p>Transport:</p> <p>The local plan includes a massive increase in the number of houses as part of the new town being proposed for the area. These houses will all have cars and will all need to drive out of Thatcham to places of employment including London, Reading and other areas. Opportunities are limited within Thatcham. WBC have suggested that this extra traffic would be funnelled towards the junction of the A4 and the A33. At times of the day is already at a standstill due to traffic volumes. Due to the rushed nature of the document the junction of the A4 and the A33 mentioned, this junction will funnel additional traffic towards upper Bucklebury and Cold ash. WBC in their own Strategic Environmental Assessment (SEA) state their objective to be to increase safety and reduce accidents, how can funneling large numbers of additional vehicles (including vehicles trying to avoid the A4), which have many roads without pavements be safer? This will also have the effect of local people being able to walk or cycle due to increased traffic, the complete opposite of objective 4 of WBC's SEA.</p> <p>Healthcare:</p> <p>Thousands of new houses will mean many thousands of people moving into the area, these people will all need access to healthcare. The planned development proposes a new primary healthcare facility, but with NO DETAIL of who will pay for the building and the development this will happen. At the moment it is difficult to obtain an appointment with a GP, unless there is a number of people to cope with the numbers of new residents its going to become almost impossible. This needs to be planned BEFORE the development that does not seem likely.</p> <p>Local dentists are also at, or near to capacity (The WBC endorsed Thatcham vision 2016 showed that 40% of Thatcham residents have a local dentist) The plan has no details of where the new residents of all these houses are expected to find a dentist. In my opinion the plan is unsound as it does not take into account the basic medical needs of the new population.</p> <p>Schools:</p> <p>My comments with regard to schools provision is broadly similar to those for healthcare. The local schools are already at capacity and the number of additional school places that will be provided by this development and at what point they will become available have not been planned for. All that has been suggested is a sum of money and no detail of whether this will be adequate to meet the needs before the families move in then they will either be forced to drive long distances to find an available school (adding to the traffic) or the already resident families will be forced to do the same. This cannot be regarded as sound planning.</p> <p>Environment:</p> <p>When protection of the environment is coming more to the forefront, the idea that building thousands of houses on the edge of the ANOB is totally unsound. With food prices increasing it is shocking that a local council will even consider a development of this scale. The estimated 4000+ extra residents will have easy access to the ANOB, the plan even states that there is the intention to build towards the ANOB. This cannot be sustainable and without doubt will have a negative impact on the local environment. There are no "country parks" there. The local plan (SP17) even concludes that this new town will have a negative impact. The mitigation of this by "country parks" is a joke, these are just areas where it is hard to build because of the shape of the land, it has nothing to do with either useable green spaces for the residents or to increase (or even maintain) biodiversity. This is just a box ticking exercise with no consideration for the environment.</p> <p>In conclusion this plan is unsound because WBC have not thought through the delivery of healthcare, dentists or schools and there is no consideration for local residents in terms of the increased traffic flow through the villages and no protection for the environment.</p> <p>Finally, in December 2022 Michael Gove announced a major change to the volumes of housing that local councils are required to provide. The plan has not taken this into account and has ploughed on regardless.</p> <p>The whole plan needs to be reconsidered putting the needs of local residents before the profits of the developers.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Morrison, Michael
Consultee Full Name	Michael Morrison
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS504
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	01/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>1 I am objecting to the plan as so much of it is seriously unsound and it would have a massively detrimental effect on the local area. The extra traffic, extra load on the health services and extra stress on bucklebury common are just a few of the things that will affect the locals.</p> <p>I would therefore urge refusal.</p> <p>1 The written ministerial statement by Michael Gove (6th December 2022) indicates that the housing numbers are not to be exceeded. The Inspectorate should no longer override sensible local decision-making, which is sensitive to and reflects local circumstances. The question of how many words is any of this development needed at all?</p> <p>1 The document talks about how the environment, both human and natural, will be improved or if not improved through the actions taken by the developers. The plan shows no evidence of any surveys to provide baseline conditions or indicators, nor does it explain exactly how the environment would be improved and what they would do to "mitigate" any destruction. This makes this important section of the plan unsound.</p> <p>1 Building a major Greenfield development in the north Wessex downs AONB will forever affect the enjoyment of the area for local communities. There will be a detrimental impact to legally protected wildlife known to be present on the site, not to mention the loss of use of existing areas such as Bucklebury common. This again shows that the plan is unsound in its analysis, reasoning and conclusions.</p> <p>1 I understand that before any development of this size is undertaken, there should be sufficient capacity in the sewerage system to handle the waste produced. I have seen no mention of analysis or funding for the expansion of the sewerage system to be completed before any building starts, surely that is another reason why the plan is unsound. With the current sewerage system no additional housing should be built.</p> <p>1 The plan is unsound where traffic considerations are concerned. There is no plan or funding for a bridge over the river. There are plans for exits from the estate onto a number of roads including Harts hill. This will produce a large increase in traffic on cold ash and Upper Bucklebury. There are comments in the plan that "modelling suggests" that all this will not cause any problems. It shows no modelling detail or results.</p> <p>1 There is no mention in the plan of building low energy, sustainable houses. Simply that the 2500 houses have been built. There is no indication as to exactly what the design of the housing would be Surely any council, in this current climate, should be required to make a massive change to the environment in the Thatcham area and as such, I feel that this makes the plan unsound in its analysis, reasoning and conclusions.</p> <p>1 The development is so far away from Thatcham station and Thatcham town centre that cars will be necessary. The plan does not mention a section on safe and sustainable transport and the strategic environmental assessment which accompanies the plan does not "promote and maximise opportunities for all forms of safe and sustainable transport". With probably 1500 extra cars the plan does not comply with the safe and sustainable transport objective. Another example of an unsound part of the plan.</p> <p>1 As a local resident for over 40 years, I feel that the building of 1500 houses so close to Upper Bucklebury will have a detrimental effect on the area detrimentally and forever for me, my household and anyone living in this very special area.</p>

	<p>1 There is no health impact assessment in accordance with guidelines from public health England, and no obvious surgeries. This makes the plan unsound and would also mean that none of the possible 1500 + residents would be available from the three local over-subscribed surgeries.</p> <p>1 The plan for secondary school provision is unsound with no timing or funding, no analysis of possible pupil numbers and location of any school.</p> <p>1 This is still essentially a plan for 2500 houses. The developers have simply reduced the headline numbers to make development the same. It would then be a comparatively easy matter to build the other 1000 houses in the future. There is no concession at all.</p> <p>I hope I have shown in the above examples that this unsound plan should be rejected. The West Berkshire housing requirement based on recent government figures of housing requirement and this will probably show that there is no need at all for this plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hubbard, Richard
<p>Consultee Full Name</p>	Richard Hubbard
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS284
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	27/02/2023 10:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I object to the proposed development plans for North East Thatcham. The plan is flawed in so many ways, but a few of the most egregious features are: General Infrastructure. The plan for increased housing has been prioritised over the need to provide a supporting infrastructure for the population. The planning ethos appears to be, that if the houses are built, then the infrastructure will follow. Past experience shows this is not the case. Roads. The effect on roads in the surrounding villages and AONB due to numbers of vehicle movements will be an increase. The roads through the villages are already strained and dangerous for pedestrian and cycle traffic at peak times. The increase in traffic, which is inevitable, will be the cause of harm to pedestrians and cyclists. This danger to life includes primary aged children on the roads. Green Spaces. The token "green spaces" are an insult to communities that have chosen to make their lives in a rural area. They are no more than car parks. Also, the designation criteria do not appear comply with guidelines as set out in the National Planning Policy Framework.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Neville, Margaret
Consultee Full Name	Margaret Neville
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS322
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	25/02/2023 22:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to object to the proposal to build 1500-2500 homes in NE Thatcham. This plan is unsound for the following reasons:</p> <p>1. Increased Traffic on Harts Hill, in Bucklebury and Cold Ash</p> <p>Drivers will inevitably look for quicker and shorter routes avoiding congestion on main roads and this will lead them to the hamlets as well as Cold Ash. Indeed WBC predicts "some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury". Broad Lane, Burdens Heath and The Ridge are already busy during peak times. There are no pavements on the latter two roads, just a concrete walk along the edge of the road. The area around St Finians School is particularly dangerous with parents parking on the road and cars waiting to turn into the school. Broad Lane has chicanes which do slow down traffic but will cause major delays. This will mean drivers will look for alternative routes and will drive down Little Lane, Fanny's Lane and The Slade. These lanes are quiet lanes where horses, walkers and cyclists will be present. They are single lane with passing places. Increased traffic will have a direct impact on the environment, damage verges and generally detract from the aim of quiet lanes which is to provide a safe environment for cyclists.</p> <p>Harts Hill itself, where traffic will exit the site, is narrow and bendy. There are no pavements and two large vehicles can't pass. It's very dangerous and it's very likely that a serious accident will occur here. It's particularly dangerous for cyclists. It's impossible to pass a cyclist without going onto the other side of the road and there are so many bends in the road that it's not sufficient to do so safely.</p> <p>2. Damage to the Environment in an AONB</p> <p>The sheer volume of people living next to an AONB will inevitably lead to an increased footfall on Bucklebury Common. This will reduce the biodiversity of the ancient woods and heathlands. It will detrimentally affect the wildlife, such as ground nesting birds, Nightjars, Barn Owls, Adders and Slow Worms to name a few rare species. The planned 'Community Parks' in the new development are unspecific and appear not to have any substance. It seems unlikely that people living in this new development will have enough room to exercise, walk their dogs and enjoy the outdoors within the AONB.</p> <p>3. Lack of provision of doctors, dentists and schools West Berks has a duty to provide these and yet no provision has been made. GPs and dentists are already oversubscribed. Bucklebury school children will be unable to attend Kennet School which is the nearest school given to residents of the new estate which will be closer to Kennet.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Matthews, Anne
Consultee Full Name	Anne Matthews
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS545
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposed housing development to the NE of Thatcham.</p> <p>The development is not sound.</p> <p>The loss of an area of Green Space on this scale would adversely effect an AONB. It would destroy the local environment. A variety of animals and plants depend.</p> <p>A significant increase in population (and therefore traffic) will have an adverse effect on the infrastructure of the area. The surrounding rural villages cannot cope with more traffic. It would have a detrimental impact on already badly maintained roads making them more dangerous.</p> <p>WBC need to revise their thinking on this matter in the light of a statement by Michael Gove at the end of 2022 that planning is ADVISORY not MANDATORY. Other potential development sites which would not have such a destructive effect on the environment should be under consideration.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Puri, Susan
Consultee Full Name	Susan Puri
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS279
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 18:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to express my objection to this development because of the following reasons Potential 2500+ more cars, increased air pollution, congestion on A4 and A340, rat runs through the local villages of Upper Bucklebury, Chapel Row, Bradfield, and congestion already at Thatcham station train barriers.</p> <p>The negative impact on local GP practices where it is already difficult to get appointments. Adding thousands of new houses will have a negative impact on the local population.</p> <p>The negative impact on the overstretched education system particularly secondary schools with schools already over capacity.</p> <p>The lack investigation into the Colthrop site where a bridge could be built moving a lot of houses away from the AONB.</p> <p>There would be no defined gap between Thatcham and Upper Bucklebury with Upper Bucklebury becoming a part of the built up area.</p> <p>The fragile eco system of the proposed area also needs to be protected and needs to be left as countryside to protect the area from the fight against climate change.</p> <p>The central government has removed the legal requirements for specific housing numbers to be met by councils, the good to understand why WBC is continuing to force through this huge development? What are the other external factors that are driving the council to build between 1,500 and 2,500 houses in this area where roads, public transport, GPs and schools are already crowded? The removal of the legal requirement makes it a great opportunity to pause and produce a properly put together, more sensible for this area</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thompson, Peter
Consultee Full Name	Peter Thompson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS474
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	28/02/2023 23:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Further to my e-mail of 5 February 2021, I am writing to object to the proposed development of up to 2500 houses as I am not satisfied with the Council's response to my objections and I am objecting to the plan as I find it unsound. My main reason for objection is the</p> <p><u>Removal of community boundary between Thatcham and Bucklebury</u></p> <p>The land north of Floral Way currently provides a strategic gap between Thatcham and Bucklebury. This proposal undermines the value of maintaining a strategic gap to separate communities by virtually eliminating it and would visually and socially break the link between the two villages.</p> <p>It is acknowledged that should the site be developed, there will be a reduction in the physical separation between Thatcham and Bucklebury. I do not believe the assurances that a landscape led development would, in reality, retain and protect the character of the individual settlements. It would be of lasting and irreversible detriment to the identity and community within which we live in because of its identity as a village community and the surrounding countryside.</p> <p><u>Traffic</u></p> <p>A development of the scale proposed would lead to a significant increase in traffic, which has not been adequately considered. It is an assumption that the bulk of traffic would use the A4, accessed via Floral Way; the A4 is already commonly over capacity and significant congestion which is harmful on the environment, and new residents would look to other routes. These routes are rural Parish villages, particularly for access to the A34 and M4, on rural single-carriageway roads with blind corners and not well-suited to coping with the additional volume of traffic:</p> <ul style="list-style-type: none"> • The increased traffic will negatively impact many surrounding villages including Upper Bucklebury, Cold Ash, and Bradfield • The current roads will not be sufficient to support this increased level of traffic • These roads already suffer with concerning levels of speeding (recent Parish Council SIPS deployment has confirmed the figures) and the proposal would exacerbate this issue further • The increased traffic will be a safety concern for local residents, particularly children whilst walking to and from school • The houses located on Harts Hill Road and Burdens Heath in Upper Bucklebury, and The Ridge in Cold Ash, will be impacted. Increased traffic along these roads will make it significantly more dangerous for pedestrians in these areas in particular • The increased volume of traffic will impact the quality of life for the residents of the villages mentioned through increased noise and air pollution <p>It is acknowledged that there will be delays at junctions and the highway network on the A4 corridor and adjoining links. The development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. It was also noted that the transport models do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of up to 10 minutes to the 2036 Core Forecast (without development). It should be noted that Upper Bucklebury and Chapel Row already experience delays in flow when there is congestion on the A4.</p> <p>It has since become apparent there is a plan for an exit at the north of the site onto Harts Hill road which will significantly impact Cold Ash, Upper Bucklebury and Chapel Row. I do not believe the Council's Transport Assessment has properly considered the traffic and there is not enough evidence to show proper modelling has been undertaken to consider all of the potential impacts of the site onto Harts Hill road. I therefore do not have confidence the mitigation measures and improvements to the local transport networks.</p> <p>There is also not enough evidence to back up the Council's assertions that the plans will reduce accidents and improve the opportunities for walking, cycling and use of public transport.</p> <p><u>Inadequate Supporting Infrastructure for Scale of Development</u></p> <p>A development of the scale proposed would have significant knock-on impacts to local infrastructure, a number of which have been considered.</p> <ul style="list-style-type: none"> • The proposal does not consider the increase in healthcare services required to support +25% housing increase • The proposal does not consider the strain of a likely increased demand on Thatcham Train Station. Parking facilities are already insufficient to cope with current demand and there would need to be a significant increase in the provision to cope with increased demand • The road infrastructure in a number of common commuting directions from the development are not sufficient, in particular the A4. This has already been experienced at the rail level crossing when travelling south <p>The Council noted my concern regarding infrastructure and stated that a development which does not provide adequate infrastructure will not be supported.</p> <p>It is evident that the Council and the developers have neither arranged a relevant Health Impact Assessment, nor have they been having appropriately liaised with local health care agencies or providers. I therefore do not have confidence the increased demand has been properly assessed and this will place extreme pressure on our existing healthcare services.</p>

Since raising my initial objections, it has also become clear that there is no clearly defined plan within the Local Plan for education from nursery, early years, through infant to secondary education, which the Council is obliged to meet. This is our existing education provision.

AONB

The proposed development is adjoining the Bucklebury Common and AONB and it would have a long-lasting negative impact on the area. There would also be a significant detriment in the loss of the open aspect of the local neighbourhood and loss of the green space. The close proximity of the development to the Bucklebury Common and AONB will have an impact directly and indirectly on visitors:

- The Common is protected because of its flora, fauna and situation and its special habitats are home to rare and ancient woodlands. I doubt that such a close, high-density development, will have a negative impact on this area and wildlife
- The plants in and bounding the AONB would suffer and the Common would be put under pressure from additional traffic
- The AONB is already suffering habitat damage from walkers, cyclists and motorised vehicles and the additional damage to this struggling environment
- The area already suffers from significant waste issues, that needs the support of local village volunteers to remove the waste on days to keep under control

There is no evidence to support the claims that SP17 will have a positive effect on the environment. The Local Plan Sustainability Charter to establish how policy requirements will be achieved and that the Charter will be informed by other policies on ecology. It is unclear that these strategy documents exist or, if they do, they have not been made available for public consultation.

SP17 has no clearly defined plan for providing adequate green space and protecting biodiversity. As stated previously, the plan would increase the numbers to the AONB and the Common and this will exacerbate the damage to this struggling environment. In fact, the plan has the intent for SP17 to drive additional traffic (people and cars) into the AONB. However, the management vision for Bucklebury Common is focussed on not increasing the human pressure on the habitat they are working to conserve.

There is not enough evidence to suggest the Council has made serious attempts to investigate, analyse and systemically assess the sustainability consequences that such a large, concentrated development site would bring. It would be of lasting and significant impact on the Common with devastating effects on the flora, fauna and wildlife in these areas which is something we as a family value. One of the main reasons for choosing this area to live in.

Pollution

The proposed development would generate pollution in the form of extraneous light which would drive local wildlife out of the area and also affect local Bucklebury residents by spoiling their night sky. Furthermore, the scale of the proposed development would increase pollution from carbon emissions and those associated with increased population density.

Whilst the Council has highlighted various policies that are intended to address concerns relating to pollution, it goes without saying that there will inevitably be a detrimental effect on residents. For example, it has been acknowledged that traffic flow and congestion on the roads will lead to increased pollution from carbon emissions at a time when the public at large is being urged to reduce its carbon footprint.

Additional Point

The Council should await the outcome of the National Planning Policy Framework consultation that closes on 2 March 2023. The emphasis in the consultation on considering the character of an area when assessing how much housing can be accommodated is pertinent in this case. The Council should pause the current plan on the basis that a lower housing requirement could be adopted for the area currently being planned for and produce a revised plan in line with the updated planning guidance when this comes out.

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Doggett, Carol and Colin

Consultee Full Name	Carol and Colin Doggett
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS341
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 11:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newby, David
Consultee Full Name	David Newby
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS264
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 15:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes	

* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>With reference to the above, I am writing to strongly object to the proposed development as I find it fundamentally un</p> <p>On 6.12.22, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement on the Standard Method for calculating the housing requirement for a local authority (and which has been used by West Berkshire Council as part of the plan), should now be an advisory starting point and not mandatory. The resulting ongoing consultation has a far greater opportunity to pause the plan making to await the outcome of the consultation with its updated planning guidance.</p> <p>The land north of Floral Way has maintained the gap between Thatcham and Bucklebury thus ensuring a rural environment for the benefit of overall wellbeing. The proposal all but eliminates the separation and will visually and socially break natural communities and well established planning norms which have been consistently applied in the recent past. It is incomprehensible that</p> <p>The proposed development abuts Bucklebury Common and the North Wessex Downs AONB. This development will have a significant impact on these special environs. Bucklebury Common is protected because of its flora, fauna and its situation. It contains numerous habitats that are known to be home to legally protected wildlife. The plants in and bounding the AONB will suffer and be under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorists and this will inevitably increase with the proposed development adjacent to it.</p> <p>There is no evidence in the background documentation provided by West Berkshire Council to support claims that the development will benefit the environment. In fact, it is much more likely that it will have a significantly negative impact. The plan's own Sustainability Statement will have a negative impact on environmental sustainability - 'The site is a greenfield site and therefore, would result in a loss of environmental sustainability which would be mitigated.' Nowhere in the plan is any detail given on what those mitigation measures would</p>

	<p>to undefined 'community parks'. In addition, the plan states its intent to provide a green infrastructure network to 'take to 'facilitate connection to the AONB', which will inevitably lead to increasing human pressure on the fragile ecosystem.</p> <p>In addition, the proposed development on a sloping site with associated runoff from concrete and tarmacadamed paving contribute to a greater risk of potential future flooding events along the river valley (A4/Bath Road and Thatcham).</p> <p>Overall, the focus of the SP17 policy is to build as many houses as possible in a small area of the countryside, with investigate, analyse and systematically address any potential consequences.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lyon, Liam
Consultee Full Name	Liam Lyon
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS476
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	28/02/2023 15:35:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<p>I have limited knowledge of planning laws, and the huge amount of information available on LPR Regulation 19 is compelling arguments promoting the benefits of this development unsound. I am lodging my objection on the grounds of the impact on me, my children, my community and the local environment.</p> <p>AONB and the destruction of wildlife</p> <p>This development would be a massive over-development of the countryside and would destroy the beauty of the area for dog-walkers, quadbike/scrambler riders, dog fouling and litter. The increase in cars driving and parking on the Commons would have a huge detrimental effect on the area...not to mention the destruction of the wildlife.</p> <p>Contrary to WBC claims in Regulation 19, there is every reason to believe that this development will have a significant impact on the environment.</p> <p>Traffic</p> <p>This will have a significant impact on traffic in the area, especially on the routes in and around Thatcham and over the top of the hills, increasing the traffic through all of the surrounding villages of Upper Bucklebury, Cold Ash, Chapel Row, Bradfield Southend etc.</p> <p>With the plan to have an exit at the north of the development site onto Harts Hill Road and a roundabout on Harts Hill Road, the risk of accidents on an already dangerous road and also lead to congestion on the A4. I'm also not sure what the new road is for?</p> <p>WBC say that there is likely to be a positive impact on road safety (as safe travel will be critical to the design of the site) but in this case, this can be the case.</p> <p>Medical Practices</p>

	<p>Although there are proposals for a new GP Surgery, a development of this size should have a Health Impact Assessment. The development's design has considered the impact on the health and well-being of existing and new communities. done.</p> <p>Also, it doesn't appear that WBC/developers can convincingly evidence that they've liaised with the local health care and can cope with the extra burden of these new houses.</p> <p>Schooling: There doesn't appear to be a clear detailed plan for the provision of nursery or early years education. For secondary education, Kennet School is already oversubscribed. If the development goes ahead, children from the area will be limited in getting into Kennet School. Children from Upper Bucklebury will be limited to going to the Downs.</p> <p>Although the LPR provides for a new secondary school being built, it's not clear where it will be located, or the number of places. It's not clear if the proposed funding is sufficient to meet this cost or the timing of this funding.</p> <p>General While I understand the need for more housing, WBC and the developers appear to want to build as many houses as possible. I am concerned of the consequences that a development of this scale will have on the health and education services, traffic and environment area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Cold Ash Parish Council
<p>Consultee Full Name</p>	Mrs Linda Randall
<p>Consultee Organisation</p>	Cold Ash Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS415
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail</p>	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	01/03/2023 13:55:00
Attached Files	CAPC Appendix 1.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Executive Summary</p> <p>Cold Ash Parish Council (CAPC) has made the following submissions in response to the West Berkshire Council (WBC) Regulation 19 (Reg 19) Consultation. The representations build on CAPC's objections to the regulation 18 *reg 18) version of Local Plan Review contains numerous significant flaws that cannot be fixed before the document is adopted.</p> <p>We specifically address the proposed THAT20 development for North East Thatcham, initially for 2500 homes and land on CAPC and our residents. We expressed our opposition to this development in 2021, arguing that the proposed number of homes was significantly reduced, and that the infrastructure to support any such development needed to be significantly improved. If this point is adequately addressed in LPR Reg 19, we have the same principal objections but build on them here.</p> <p>The proposed THA20 development appears to have been chosen in response to the constraints of potential development of a balanced review of options. Concerns have been raised about the lack of consideration for necessary infrastructure surrounding villages and transportation networks. Furthermore, the impact on Cold Ash Parish's quality of life and community is a serious concern. Cold Ash Parish Council strongly urges West Berkshire Council to reconsider and scale back the development. If the development is approved, there are serious concerns about its long-term viability and impact on Cold Ash Parish.</p>

This submission includes specially commissioned report data outlining the key reasons why we believe THAT20's traffic impacts have not been correctly considered and therefore flawed. It also emphasises previously argued objection points, but with new and different positions.

Given these flaws, our previous objections, the additional points in this submission, and the strength of feeling locally about the proposed development of THAT20, we conclude that the Local Plan Review and its accompanying evidence base should be either withdrawn, reworked and / or significantly reduced in housing numbers.

Cold Ash Parish Regulation 18 Feedback 2021

CAPC provided a formal response to WBC Reg18 Local Plan consultation dated 4th February 2021. A full copy of the response is available at the following URL address:

<https://coldashpc.org.uk/the-council/planning/west-berkshire-local-plan-review-to-2037/>

In summary our CAPC response highlighted the following key areas of comment and objection to the proposed LP:

- The proposed THA20 development is in response to constraints placed on potential development areas, such as flood zones, AONB, and other restrictions in AWE and flood zones.
- Development has been chosen in response to limiting development in the AONB, without regard for necessary infrastructure improvements surrounding villages and transportation networks.
- To address transportation and travel issues, significant infrastructure improvements and mitigation would be required.
- Quality of life issues will need to be addressed in this large-scale development. Historically, similar developments have resulted in isolation and quality of life.
- The impact on Cold Ash Parish could result in the loss of iconic views, increased traffic, noise, pollution, and strain on local services.
- Parish Council urges WBC to scale back strategic development and more evenly distribute housing.
- Serious concerns about the development's long-term viability if its size is not reduced.
- Current traffic through the parish is already high, and WBC traffic model growth is expected to have a significant impact.
- Concerns about long-term mitigation without destroying the character of settlements, as well as firm evidence, that the development will not be delivered.
- A limited road network with only 22% having pavements, and residents who are subjected to noise and air pollution.
- Concerns that promised facilities in the policy may not be delivered, and request for policy wording change from "will be delivered" to "will be delivered".

Extraordinary West Berks Council Meeting concerning Reg 19 Local Plan

CAPC agrees with and supports the WBC councillors' proposals for consideration at the extraordinary meeting of WBC on 12th February 2022. CAPC agrees that the following omissions and ambiguities clearly necessitates that the Council should undertake a new Regulation 19 Consultation in the future once these issues have been rectified.

<https://decisionmaking.westberks.gov.uk/ielistDocuments.aspx?Cld=116&Mld=7300&Ver=4>

- The housing numbers for northeast Thatcham were stated to the Council as a reduction from 2500 dwellings to 1500. The Consultation only envisaged 1250 dwellings to be built, which has now increased to 1500. The number of homes should therefore be increased to the original 2500 when the Plan is reviewed after 5 years or in the next plan period.
- The update of the Housing and Economic Land Availability Assessment (HELAA) includes a large number of sites that have been rejected. Councillors could not have been aware of this when they approved the Plan.
- The Air Quality Assessment is based on the Local Plan Review (LPR) running to 2037, not 2039, which affects the end of the LPR period and the resultant traffic pollution.
- The Council has not complied with its legal duty to cooperate with Berkshire West Clinical Commissioning Group for the surgery promised for northeast Thatcham.
- The Council has not consulted properly with Thames Water over the time needed for provision of water and foul services. We do not know if the houses for northeast Thatcham are deliverable in SP17 in the plan period.
- The Settlement Boundary background paper shows the Thatcham settlement boundary already extended to the east of the village, yet the plan now refers to a minimum of 1500 houses. This could be read that 2500 dwellings are still within the extended boundary.
- The new provision for secondary schools in northeast Thatcham is not consistent with Council guidelines for the number of schools.
- The Infrastructure Delivery Plan (IDP) has omitted any costs for a new secondary school in northeast Thatcham.
- The Secretary of State's Written Statement of 6th December 2022 should be taken into account by the Council to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans, removed top-down housing targets, and transition period for LAs in the final stages of preparing Local Plans.

The following sections detail current feedback, data and the points of objection raised by CAPC within the LP specific to Cold Ash by the Proposed THAT20 development.

Traffic & Transportation

Key Traffic & Transportation Objections to THAT20 (SP17) in the Local Plan

Following a thorough examination of the transportation evidence base (See Appendix A Study conducted by SW Traffic Modelling Ltd, 2023), serious concerns have been raised about the dependability of the modelling outputs. The WBSTM is a broad-area model used to guide strategic decisions about the district's future growth, with a focus on key traffic corridors. According to the evidence, there are serious concerns about the model's ability to accurately forecast impacts at the local level, including within Cold Ash parish.

- Despite the widely varying levels of growth and variable mitigation assumptions built into each test, there are very high predicted traffic flows for each of the model scenarios, as noted in Section 3 of our study. A key finding from the modelling is that the model is expected to result in traffic flow reductions in many areas of Cold Ash parish, with only minor increases elsewhere. Given the proximity in the Local Plan and the proximity of the THA20 site, this appears to be a highly improbable conclusion, casting doubt on the model's ability to accurately forecast impacts at the local level. The most recent Local Plan Forecasting Report recognises that modelling is an iterative and ongoing process. Further work is needed to fully understand and improve the model's functionality in the Cold Ash area, as well as possibly in other areas.
- THA20 consideration includes bespoke trip generation rates that are significantly lower than the default trip rates. The principle of using bespoke rates is not unreasonable, the methodology used in this case, as described in Section 2.4.2, underestimates the likely trip generation. In addition, additional trip discounts have been applied to account for public transport and cycling modes of transportation. Although it is a minor change, the predicted reduction is based on unsubstantiated aspirational mitigation measures that may not be implemented.
- Furthermore, as mentioned in paragraph 2.4.2 of our study, the traffic modelling currently does not include the impact of the proposed development on the District Council's target of 5,510. There is a 759-unit housing shortage. According to the Local Plan, the target is required to meet the District Council's target of 5,510. There is a 759-unit housing shortage. According to the Local Plan, the target is required to meet the District Council's target of 5,510.

portion of this shortfall (325 dwellings) may need to be provided on Cold Ash sites CA12, CA16, and CA17. This has a significant impact on the parish's road network, but it is not currently accounted for in the modelling.

Given the above, it is believed that the WBSTM outputs do not accurately reflect the changes in traffic flows that are expected and their significant impact on the parish. Thus, we conclude that the current evidence base does not provide a solid basis for the traffic impacts of Local Plan growth.

Please see Appendix A for the Full detailed Traffic assessment study of the Transport Evidence Base contained in the conclusions. <see attachment>

Spatial Issues

We object to the THAT20 proposed development on the grounds that it would significantly impact spatial and coalescence of the emerging Neighbourhood Development Plan (NDP). We believe that a scaled down solution or further work is needed to be addressed properly.

Why? We state in our emerging NDP CAP 1 Policy (Reg14 underway) that Development shall 'preserve or enhance the rural character of the area, including the setting of the North Wessex Downs AONB' In addition 'Such development must not individually or collectively result in the loss of or visual coalescence and loss of separate identity of the individual settlements in the parish (Cold Ash or Ashmole) and from each other'

We have significant concerns that such a large development would run against these policies and eventually not allow the parish to remain rural. For other local parishes these spatial policies would also be broken completely.

The strategic gap between Bucklebury and Thatcham is an extremely important one. Bucklebury is a rural parish with a rural setting. Thatcham is an urban town. Floral Way is the important boundary between them, and it should not be breached, otherwise the rural setting will be lost. The Bucklebury Vision states that local residents highly value the rural nature of the area in which they live and which they wish to pass on to future generations to enjoy.

All policies point to the requirement that these settlements should be distinctly separate and maintain their own defined rural setting. The requirement for separate settlements is made even more important if the remote nature of the AONB is to be protected in accordance with the NDP.

Unfortunately, the development at North East Thatcham would destroy this important feeling of separateness, with the housing estate with the rural setting of Upper Bucklebury. Although there is a "country park" strip between them, this is ineffective in maintaining the gap between the settlements. As Upper Bucklebury is lost into Thatcham, so too is the rural setting.

Further we believe that the development would put significant pressure on our proposed 'buffer zones' to maintain our parish separation.

The rural 'buffer zone', which has been identified by the community as the areas where development would most likely be avoided, is the character of the villages. Hence development should be avoided in this buffer zone, but any development that significantly reduces the green space buffers between any of the settlements will not be supported by policy CAP1.

We state in our emerging NDP (CAP 1.3) that '*In determining development proposals substantial weight will be given to the need to protect brownfield land within the settlement boundaries for either homes and/or other identified needs, or to support appropriate employment, provided that the land is not despoiled, degraded, derelict, contaminated or unstable land.*'

We feel that this has not been adequately considered in the LP and additional work is required to explore the potential of brownfield sites. CPRE (The Countryside Charity) Berkshire is encouraging members to take part in a public consultation on West Berkshire housing distribution. The organisation is advocating for a review of the current situation of brownfield sites rather than sacrificing countryside or overburdening local villages with development. According to CPRE, there are brownfield sites in Berkshire that could accommodate over 21,000 houses, with West Berkshire alone having 53 such sites. CAPC supports this view as stated in our Cap 1.3.

Education

The education plan presented in the Local Plan Review is inadequate and requires additional work before it can be considered coherent, is contradictory and incomplete, and fails to meet West Berkshire Council's obligation to provide education for all children.

The provision for education in the Local Plan Review is not clearly defined, with no end-to-end plan presented. As a result, the obligation to provide educational facilities for children is breached, rendering the plan for a large new housing development unworkable.

The lack of effective or justified education provision across the various proposed developments makes estimating the impact of the development on education impossible. The placement of a secondary school in the North East Thatcham development under policy SP17 would result in increased traffic throughout the Thatcham area, which has not been adequately considered in the LPR's traffic plans and modelling.

Furthermore, the provision for primary school education is ambiguous and contradictory, with no data or evidence on the impact of the development on 'primary school entry' requirements. While the LPR proposes that £12 million will be sourced from the SP17 developers to fund primary school education, no recent data to assess whether this funding would be sufficient to deliver the required education provision.

Secondary Education Concerns:

- Policy SP17 in the Regulation 18 emerging draft Local Plan (2020) stated the expectation of a new 8FE secondary school
- Policy SP17 of the Regulation 19 consultation reduced the provision to only land for secondary provision
- Thatcham Strategic Growth Study indicates that planned strategic development at a 6-8FE secondary level is not viable
- The provision of land sufficient for a 2.5FE Secondary School is below the minimum viable size for a Secondary School
- West Berkshire Council School Places Plan 2010 states that a 6FE secondary school will be considered as a minimum for new housing developments
- Department for Education's 'A guide to new mainstream free school revenue funding 2022 to 2023 (June 2022)' states that a secondary school should have a minimum of 4 forms of entry of 30 pupils (total of 120)
- Provision in SP17 for "Secondary provision - Land to meet the impact of the development" is inconsistent with the current policy for secondary education and would not receive funding from Government
- Kennet School and Trinity School are currently at full capacity, and there is no capacity in these schools to serve the needs of the pupils of the proposed development
- The Infrastructure Delivery Plan of January 2023 only has a figure of £5,027,613, which cannot be the cost of a secondary school. The policy is silent on how the building costs for a secondary school would be funded.

The situation for Bucklebury and Cold Ash secondary school students is unclear, with no details on the location of the secondary school, the provision of education, and thus no way of assessing its suitability, deliverability, or achievability. With a 40% reduction in the LPR (2022 to 2039) to 1500 houses, a secondary school simply cannot be sustainable or deliverable in this location, as stated in the Strategic Growth Study.

	<p>Furthermore, the Thatcham Growth Study noted that the education provision was based on WBDC data on pupil yield and the use of 11-year-old data insufficient. Although the LPR now states that land will be provided for development, the remains unsound for the following reasons:</p> <ul style="list-style-type: none"> • There is no convincing evidence of the number of students the school will serve. • It is unclear where a school would be located within the proposed development. • The number of Form Entries is not specified, but anything less than a 6FE school is considered unsustainable. • There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education and that the responsibilities for funding are unclear and have not been adequately costed in the viability appraisals. <p>West Berkshire Council is required to make arrangements for adequate school provision, but the LPR does not define what will be met across all school years. As a result, it is clear that the education plan presented in the Local Plan Review cannot be fully considered, and the inspector should reject it in its current form.</p> <p>Healthcare</p> <p>CAPC is concerned about the provision for Healthcare in the LP and its potential knock on to that provided to existing facilities. The proposed GP surgery should have been evaluated for viability as part of Policy SP17's Sustainability Appraisal. The sustainability issue in the Sustainability Appraisal, but the single sentence in Appendix 5 is insufficient and appears to not take into account the specific proposals in Policy SP17. As a result, the Sustainability Appraisal is not legally compliant.</p> <p>Given the expanding range of NHS healthcare services provided through primary care, we are concerned about the impact of the metre GP Surgery in North East Thatcham under Policy SP17. We also question the lack of any discussions between the healthcare groups about the size and impact of the proposed surgery, and propose that a Health Impact Assessment be carried out on the facility's size in the draft Local Plan to avoid potential risks.</p> <p>For Appendix A see attachment.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Burdwood Surgery
<p>Consultee Full Name</p>	Mark Foster
<p>Consultee Organisation</p>	Burdwood Surgery
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS493

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 08:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	No Health Impact Assesment was available
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<ul style="list-style-type: none"> • Burdwood surgery is currently full and could not take on the development patients as it stands • Appropriate additional health care provision must be present in the proposal for it to proceed • Burdwood Surgery could relocate in a new facility in the development • Burdwood Surgery proposal encompasses a thirty year health care planning horizon

	<p>Burdwood Surgery is one of the three local General Practice providers affected by the planned development of 1,500 Thatcham planning consultation.</p> <p>Burdwood Surgery is a three partner PMS primary care practice serving a population of 10,250 patients in the locality of good and a Patient Survey satisfaction level of 92%. The surgery is currently operating at 91% room occupancy with utilisation of 80% which is already limiting the ability to bring in new staff to create new patient capacity. The surgery has since its original build and now fully occupies its footprint. Surgery additional patient facing resources and services a space.</p> <p>The Burdwood site limits the integrated health and social care working potential of the Surgery for its population. The ageing population and the NHS policy shift to more care being delivered through General Practice settings mean constraints at the practice, care capacity and care quality are likely to be under extreme pressure, even without population growth. To solve this is a new site on which to relocate Burdwood Surgery. We would not support a Burdwood satellite site on the new site as a satellite site is not economically feasible, nor in line with NHS best practice. The existing Burdwood team plus additional staff would relocate to the new facility. The existing facility would be sold and or exchanged for the new facility as part of the completion of the new site. A new site would facilitate space for an enlarged team which would fit with the policy direction for more preventative care. Over the last ten years Burdwood Surgery has had to move towards only housing it's directly employed staff; this is to ensure we then do not have the same access to the allied professionals for their wider care. The shortage of space has been prevented by remote working, including remote consultations, but this leads to sub optimal surgery resource deployment. Further expansion of remote working would not be in line with best medical practice and would also likely make Burdwood Surgery a target for pressure based on rates of consultation done 'in person'.</p> <p>We have considered alternative approaches that have been suggested to us, such as moving most of our non-clinical staff to a consultation space. We strongly disagree with this idea as we do not believe that our clinicians can function optimally without the relationships we have with our support team. We believe the high patient satisfaction we have, is in large part due to the existing facility.</p> <p>The new facility would be modelled on the existing ethos of the Burdwood Surgery namely, doctor led with an aim for a practice we would be happy for our own families to be treated at. Based on the above the new facility would be approximately 1200m2 potentially across two floors as this works successfully currently and the enhanced footprint would meet future demand. The consideration also encompasses current undelivered services not offered at the practice due to space constraints such as dependency, Citizen's Advice, mental health clinics, physiotherapy and group consultations. The new facility would be built to Kennet PCN. The new surgery would successfully model and conform to the integrated health care structure and direction of the Oxfordshire and West Berkshire Integrated Care Partnership Strategic Priorities December 2022. The facility would also be designed to meet Practice zero emissions goal protocols consistent with the North East Thatcham Development Plan.</p> <p>In short, at Burdwood Surgery, we believe we are already at or beyond our patient capacity (especially when considering the needs of our patient group as they age). The practice was designed for 7000 patients using the standards of around 40 years ago when the standards of what they are now. We do not have the ability to safely take on more patients from a new housing development or a new site, or a guarantee that the new people arriving would not come under our care. In our opinion, to not do either would be a patient safety and quality of care locally.</p> <p>Accordingly, Burdwood Surgery believes for the above reasons the plan to be unsound in relation to SP17, the development. Burdwood Surgery thus requests either an assurance that none of the residents from the new development will be in the Burdwood Surgery catchment area or a new surgery is provided of circa 1200 m2.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>A Health Impact Assessment for review and consideration</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Williams, Ingrid
Consultee Full Name	Mrs Ingrid Williams
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS462
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I hereby wish to formally oppose West Berkshire council's plan to build 2500 houses in the proposed are of North Ea reasons:</p> <p>The increase in traffic will be quite considerable. This will in turn increase pollution and road safety also quite consid</p> <p>Bucklebury Parish council have commissioned a traffic study, undertaken by 'Yes Engineering'. From this study it app</p> <p>WBC are unreliable and not robust. No assessment has been made of the routes most likely to be affected by an inc</p> <p>the moment there is only 1 car in every household meaning that there will be an extra 2500 cars on the road. Consid</p> <p>road from the proposed site coming out on Harts Hill Road this will mean an enormous amount of extra traffic going thro</p> <p>and beyond I have lived in Upper Bucklebury for almost 20 years and in that time there has already been an great in</p> <p>This is of course with all the associated pollution not to mention safety issues!! I am aware that WBC are only menti</p> <p>are all aware that this will inevitably rise to the original number of 2500 houses!</p> <p>I understand that there will also be a car park built on Harts Hill Road as well as a new roundabout to allow traffic in</p> <p>development. This will add greatly to congestion on the already very busy A4 and roads coming off the A4. I am spec</p> <p>congestion that builds up because of inadequate measures taken with regards to railway crossing when trains pass</p> <p>I fail to see how WBC can claim that the increase in housing and therefore people will have a positive impact on roa</p> <p>talking about Harts Hill Road. I note that there are no modelling results for that so how did WBC come to this conclu</p> <p>Tying in with the increase of traffic is the consequential damage to the Common due to increase of footfall which will</p> <p>of national importance. A Greenfield development abutting an AONB where WBC has not given any up to date evidenc</p> <p>impact and overall biodiversity gain.</p> <p>The country park that is mentioned in the plan is to my mind nothing like the 3 small isolated areas inside the propose</p> <p>park has a meaningful environmental value which the 3 small areas in the plan most definitely cannot live up to!</p> <p>Then of course there is the increase of people in the area. These extra people will need to be looked after in terms o</p> <p>instance. This will place untold pressure on the already very stretched services that the existing GP, dental practises</p> <p>as schools are able to provide.</p> <p>I note that there is mention of a new primary healthcare facility to be built but there is no detail or insight onto the str</p> <p>does not appear to be fit for purpose health impact assessment in accordance with current guidelines from Public hea</p> <p>to be any mention of any discussions with health service providers with regards to impact on primary health care se</p> <p>that WBC should have done and if they have they should provide details of these discussions. I am sure that WBC is</p> <p>new GP practices are commissioned by NHS England even if they consider there to be a patient demand for health</p> <p>WBC seems hell bent on building as many houses as possible in a small area of countryside whilst making unsubsta</p> <p>the human and natural environment will be improved. There does not seem to be any evidence of any attempt to ana</p> <p>consequences of the plans WBC have put forward thereby failing to consider the impact this will have not only on the</p> <p>and natural, but also on the human and natural environment if the plans go ahead. I don't think it needs spelling out tha</p> <p>all round!!</p> <p>The overall thrust of the SP17 policy is clearly to build as many houses as possible in a small area of countryside, wh</p> <p>how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on co</p> <p>plans and justify the 'growth' requirement, there is no evidence of any serious attempt to investigate, analyse and systema</p> <p>Everything will be all right because their own unsubstantiated policies say it will be.</p> <p>I therefore am against the go ahead of the plans to build 2500 new homes on the proposed site. There are more suitab</p> <p>2500 houses do not have to be squeezed on a piece of land completely unsuitable for this.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ockwell, Clare
Consultee Full Name	Clare Ockwell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS262
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 14:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Being a Thatcham born resident, I wish to offer my opinion on the Local Plan and the associated Regulation 19 cons...</p> <p>There appears to be very little justification for the proposed devastation of the countryside to the north of Floral Way of Bucklebury. This is a beautiful area of our countryside, home to a vast amount of wildlife and enjoyed by many people using the footpaths through glorious open farmland.</p> <p>The plan describes building an extremely large number of new homes (1500 – 2500) on this beautiful landscape with no explanation of how this amount of people could live in and use the facilities in Thatcham or how the necessary infras...</p> <p>Thatcham has a population of around 26,000, living around a soulless former village, which has grown in excess of 100 years. The residents currently struggle to get a GP appointment, cannot easily get a prescription made and queue in traffic. The schools, particularly Kennet are at bursting point, the doctors surgeries are unable to cope with the number of patients and provision. There could be up to 3500 to 4000 new residents on the proposed site, many with children, cars, and in need of services and them and provide all essential services needed to live in the area.</p> <p>A proportion of the houses would be 'affordable', but what does that mean in reality? Social housing or the likely share of the houses by the developers.</p> <p>The plan suggests that a new secondary school would be built in the north to serve the new housing, but with no income or funding figure out of thin air. There is a similar projection for a new primary school. I recall when Dunstan Park estate was built there was space for a primary school, which subsequently was used for further housing.</p> <p>There is no area of level ground within the development site. Excavating an area for playing fields and sports facilities seems the only option, but where would the primary school go? Presumably on the same site? The pollution from the site is a threat to health of children or those using the area for recreation and sport.</p> <p>The creation of a new health centre for the use of the new households is not a decision of the local authority or the health authority, but part of a larger strategy to provide these services by the health authority. Where will they find doctors, dentists, nurses and staff to work in these settings when they can't appoint these staff now, due largely to cuts in the NHS?</p> <p>Such a large development would put strain on other local services, namely the ambulance and fire service, along with the police and its former Police Station several years ago. It is unlikely that Thatcham's current sewage works in Lower Way could cope. Can Thames Water cope with the additional water supply? There are housing sites in Thatcham, both in Lower Way and Hill putting even more burden on these essential services.</p> <p>Surely it would be better to offer plans to improve the current situation, both in the short and long term, for those living in this 'town'. Thatcham needs these things now, before even considering any further development. There is no competition for services by Newbury to those in Thatcham.</p>

	<p>The document states the “social infrastructure has not kept pace with housing growth”. This is true and I can see no the current decline taking place in Thatcham as businesses and shops close. For example, the bowling alley sits dead for young people to do, would it not be better to invest in their future rather than just bring far more young people to the town?</p> <p>The plan states “the growth has been accompanied by infrastructure growth in transport” but this is not seen in reality. The station with no facilities and two small car parks. It is not fit for purpose. After decades, the lack of a bridge at the level in the room’, causing delays and preventing traffic from moving easily to the south. There are buses, but these are few and far between. Thatcham is a town full of cars, yet the plan would bring thousands of additional vehicles to the overloaded road system. Bucklebury have become rat runs enabling traffic to get to schools and places of work on route to Reading. Hundreds of cars on the traffic levels to an amount that would damage the rural nature of the district, polluting the area of outstanding natural beauty. Yet the assessment says that policies are likely to have a positive impact on road safety as that safe travel will be encouraged. This could be achieved.</p> <p>In 3.1, there is mention of an exit from the north of the housing site onto Harts Hill Road, encouraging the traffic to use this route and without a pavement. Those using this route, cycling and walking to and from Bucklebury are encouraged to cross across fields for their safety. We need safe travel now.</p> <p>West Berkshire council predicts some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. I am aware that a number of properties in Harts Hill Road are unable to even drive onto the road from their homes, with the edge of a field to find a better exit with increased visibility. There appears to be no valid assessment relating to the impact of this on the greater area of West Berkshire.</p> <p>There is promise of a ‘community park’, whatever that may be, which is likely to have a detrimental impact on wildlife, and the loss of green fields.</p> <p>Improve what we have already and enhance the lives of the existing Thatcham residents instead of bringing new homes to the edge of the district. It is needed throughout the district, look at brown field sites, not the destruction of the green fields that people value.</p> <p>I find this plan totally unsound without any insight or forethought.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Jones, Nicola</p>

Consultee Full Name	Ms Nicola Jones
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS348
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 14:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

development in accordance with the policies of the NPPF.

* Yes

* No

Please give reasons for your answer

Please find below my objections to the Local Plan Review & North East Thatcham SP1 to the current consultation (Reg 19).

I believe that the Local Plan Review is fundamentally defective in providing the required evidence to back up the claims it makes as to the suitability and positive impacts of this development. Indeed, I am in no doubt that the unsound and vague nature of many of the positive reasoning are due to the lack of sufficient evidence having been found to date to do so once the development progresses. The Local Plan & this development as it stands has a highly negative impact on myself and others in existing local communities and users.

Additionally, given the recent announcement that housing numbers should now be a target and not mandatory and be sensitive to and reflect local constraints and concerns, the Local Plan should be updated through without sufficient impact assessment and missing the opportunity to gain this evidence and revise its plan with updated planning guidance and assessment on suitability of housing numbers.

Most notably:

1 Environment

- I have grave concerns on the environmental sustainability impact and foreseeable impact to the wildlife (including legally protected wildlife), local communities, Bucklebury Plateau Biodiversity Opportunity Area, the North West Common, myself as a dog walker in the Common, AONB and living on Long Grove (a key asset) due to the development to the Common).
- I have not found any strategy documents setting out how the biodiversity net gain target and impact on environmental sustainability will be achieved. In fact, the LP states that the net gain impact and provides no sound measures to mitigate this but states it will be achieved through measures that then they should already be available and documented in the LP. It also says that the development will have a positive sustainability impact without any evidence as to how this is achieved through measures. Assessments (especially for 1500 houses and also for 2500), questionable soundness of the environmental sustainability acknowledged. It does not come across as well thought out risk mitigation plans.
- There is no sound basis shown in this LPR as to how the community parks (is this a field, bench & swing set) and significant country parks at least implying wildlife may still frequent) will be sufficient green space for 2500 (with) given the development is significant reducing current greenfield area. The area and views will also be lost and horizon view and no longer a valley view from the top of the proposed development and only views of houses (current views of green space) which will have a negative impact on the sense of space, wellbeing derived from the area not to mention the poor impacted wildlife who will be displaced onto roads, losing nesting and hunting grounds. This will be reduced including of protected species.
- Traffic will also increase into the AONB which is a conflict with focus on limiting pressure on the fragile ecology.
- No evidence of consultation between WBC and Thames Water that water provision and waste drainage network capacity for the volume of housing proposed.

2 Traffic/transport

- There is no Modelling provided that shows that there will be no problems caused to local village roads and the volume of traffic, in particular coming via a newly entered exit on Harts Hill Road and car park, the obvious impact on schooling. The position that this will be limited is unsound as an exit here will principally lead to traffic going to Ash and Chapel Row on top of that already diverting from A4 to go this way too making a 'rat run' through villages.
- The increased traffic in villages will have a direct negative impact on those currently living there.

3 Housing volumes & Government directive

- The recent Secretary of State's statements concerning housing supply, targets and transition periods for the period to have been considered.
- The settlement boundary line for Thatcham shows the same line as for 2500 houses so does not align to the Developers and WBC plan to guarantee a country park larger to take up the space released and given the settlement boundary rather than maximum then it is obvious it is actually still 2500 dwellings which must be considered in the plan period.
- Additionally, the LPR Regulation 19 wording positions the LP as delivering a reduction from 2500 dwellings in the plan period (presumably to appear more positive) whilst in reality the reg 18 consultation envisaged 1250 dwellings. The studies are still based on 2500 so is actually increasing the provision for this LP period and maintaining the 2500. This is close to misrepresentation.
- There is still insufficient evidence of appropriate assessment with supporting evidence to back up rejection of the brownfield. The HELAA has been updated with additional rejected sites now at the end of the process rather than at the start of the process so allowing for adequate impact analyses.

4 Safety

	<ul style="list-style-type: none"> • There is no evidence that this development will provide a positive impact to Upper Bucklebury. It will negatively impact the area like myself. • Harts Hill Road and parts of current housing areas have no footpaths or cycle paths and hence the increased level of risk of accidents – no studies have been offered by WBC or the Developers to show this would have a significant positive impact purported in WBC assessment. A number of current public footpaths through the area through areas with dwellings and negatively impact the enjoyment and safety of local walkers, dog walkers and children. • Having an exit on Harts Hill Road will be risky to users of the road given the bending nature of the road and is not easily seen from distance. We see no evidence presented to show the contrary. • There will be an increased cost to us living on Long Grove as we pay to maintain the bridleway as the Council is used by cars alone and provides no modelling to alleviate our concerns that the obvious increased footfall in places where people who already come up from Thatcham area will not increase/deepen the pot-holes and thus our cost, frequent maintenance. • Additionally, there is no evidence submitted to counter the perceived increased risk to property and personal safety due to potential anti-social behaviour on Long Grove/Upper Bucklebury as people travel to and from the public house. This impacts the mental health of residents, many who are aged. Also, the impact on potential anti-social behaviour is increased due to the proposed car park. I see no supporting evidence that the policy and any future site design is likely to reduce the risk to safety – this, if at all feasible which is highly unlikely, would in any event require significant business case to justify when the time comes. <p>5 Education</p> <ul style="list-style-type: none"> • There is an inconsistency in the education level proposed between the primary school provision of 2.5 forms of entry and secondary school provision and to the WBC policy of 4 forms of entry, thus that proposed is not of minimum standard and is unsound. • It is not clear in the LPR that the provision to provide sports fields can be met, there is no evidence for funding for sports fields. The LPR assumes that the sports fields will also be playing fields then the provision of playing fields must be met. If fields are not provided or accessibility guaranteed. • Details are incomplete and contradictory and provide no guarantee that the proposed funding by Developers for the proposed schooling and, as there is no timing or site committed, that it will even be provided for the initial period. We know that the already stretched current facilities will not be over-subscribed impacting school age children living in Upper Bucklebury from Bucklebury will be disadvantaged in obtaining places at Kennet School if the policy of those living near the school. • No detailed modelling has been provided to calculate the demographics and potential future demand for schooling. The proposed schooling set out cannot be accurately assessed. <p>6 Health facilities – GP & dental</p> <ul style="list-style-type: none"> • There is no evidence of the required level of consultation and cooperation between WBC and Berkshire WSP with respect to the GP surgery size proposed. Detail is lacking on any multi agency/service provider discussions. Details of those having been taken place into account in planning the proposed facility, the timing, the sufficiency of the business case for existing practices to site branch facilities on the SP17 plan (or provide increased low income housing elsewhere), or that wellbeing and health of existing communities are not unacceptably impacted, and together with the Impact Assessment / modelling of thousands of increased patient numbers on GP and dental practices. • For existing communities, it is already difficult and lengthy waits to obtain face to face GP appointments particularly in winter. We have not been able to secure NHS dental care in the locality. • The LPR now runs to 2039 so all assessments must run to that period not to 2037. The air quality assessment period of coverage which will directly impact the traffic level forecasts and pollution calculations.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dugdale, John
Consultee Full Name	John Dugdale
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS259
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 13:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to register my objection to the proposed Thatcham NE development as I find the plan unsound. I am detailing below my reasons for my objection.</p> <p>Transport</p> <p>The amount of extra traffic generated by this huge development will have a disastrous effect on Upper Bucklebury of through the village is already used as a cut through and it has already been acknowledged traffic displacement will u It will also generate more traffic on the A4. It would appear a new car park is planned on Harts Hill but will surely add dangerous road.</p> <p>I understand the objective is to promote safe and sustainable transport but would question how this assessment has</p> <p>Healthcare</p> <p>It would appear no engagement has took place between the consortium and local health practices. The current prac The same applies to dental practices in Thatcham who are unable to provide care for the current population. I would Assessment has been carried out for the proposed development.</p> <p>Environment</p> <p>How can it be acceptable to build 1500 houses on what is a valuable green field site that will cause damage to legall that 4000 people will be concentrated on the development site. Their is no provision for adequate green space and thi areas such as Bucklebury common.</p> <p>This can only result on irreparable damage on fragile ecosystems</p> <p>Education</p> <p>There are no plans in the LPR for provision for Nursery or Early Years education</p> <p>The LPR is inconsistent on the provision of secondary schooling. It would seem a secondary school is not sustainab the number of houses. This will only put extreme pressure on the existing schools i.e Kennet and Downs.</p> <p>Finally has Thames Water been consulted to ensure that there is adequate provision for water and foul water drainag</p> <p>I am prepared to appear at the public enquiry if invited</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Morgan, Michael
Consultee Full Name	Mr Michael Morgan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS454
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	01/03/2023 10:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to strongly oppose the proposed north-east Thatcham housing development (SP17) on the basis that the plan reasons:</p> <p>1 <u>Timing of the Local Plan Review Consultation</u></p> <p>Following Michael Gove's statement on 6th December 2022, the consultation version of the National Policy Planning not mandatory. Updated guidance comes later this year and therefore many Local Authorities have chosen to pause housing level may be possible and so preserve our green fields. Why did WBC not choose this option? There would to do so.</p> <p>1 <u>Education</u></p> <p>There are no details for the provision of Nursery and Preschool education. There is no site proposed and no assessment. Primary school provision is based upon out-of-date costs and, importantly, does not specify when during the plan period to be built. There is no estimate of pupil numbers or the number or size of any schools.</p> <p>The Development Plan states that NE Thatcham development is not sufficient to fill and sustain a 6-8 FE secondary school out of date (2011). There is no detail of the land's location, so it is not possible to assess its suitability as an educational site. There is no indication that any of the schools would be built before the housing.</p> <p>The only flat land available for any school sports fields is directly beside the A4, as the development site is on a hillside. Locating any new outdoor child sports facility beside busy main roads because of pollution and traffic fumes. I can find no sports field provision.</p> <p>The NE Thatcham is likely to result in the Kennet School being oversubscribed. This may mean that children completing Year 6 at Kennet School will need to travel 9 miles to Downs School in Compton rather than 1-2 miles to the Kennet School.</p> <p>The arrangements made for nursery, preschool and primary and secondary schools are unsound.</p> <p>1 <u>Environment</u></p> <p>There is a real and obvious impact upon wildlife in ribbon development. Firstly, by destroying wildlife corridors provided between Bucklebury Common and the River Kennet. Secondly, by surrounding the various ancient woods, Harts Hill, Blacklands Woods and Ouzel Wood, the fauna will disappear as the green fields surrounding the woods disappear. In addition, on nearby Bucklebury Common and the North Wessex Downs Area of Outstanding Natural Beauty (AONB).</p> <p>I could find no evidence that SP17 will have a positive impact on the environment. There are no strategy documents to refer to. For information, I note that in a recent planning application to extend the completion date for gravel extraction at Hartley, an area of small ponds is being set aside that will increase biodiversity. This land is owned by the Wasing Estate who are planning to plant trees. Is this relevant to achieving biodiversity net gain? If so, why is it not mentioned within any plan documents? Why the lack of trees?</p> <p>I can find no record of individual plant or animal species in any of the WBC council and Stantec documentation. There are no records of the landscape, and records of the grading of agricultural farmland, hedgerows, and woodland. How is it possible not to conduct a wildlife survey of bats, badgers, dormice, great crested newts, or orchids? For example, there are at least six old farms in the area that have pipistrelle bats with implications for the construction of adjacent housing.</p> <p>1 <u>Healthcare</u></p> <p>The proposal for a healthcare facility within the NE Thatcham Development appears not to take account of local health needs. It is unrealistic or to have involved adequate liaison with healthcare providers and agencies in West Berkshire.</p> <p>There has been no published relevant Health Impact Assessment (HIA) demanded by Public Health England guidance. There has been no engagement between the NE Thatcham Development Consortium and the local GP surgeries whose practice areas are affected. This has been cursory.</p> <p>A new GP practice would not be permitted to be set up in Thatcham with current NHS England prioritisation guidance. A new practice for a modern-day GP surgery. The three existing GP practices would not establish a branch surgery because of the resource difficulties in administration, IT links, staff working across sites it would impact on their financial viability.</p> <p>Local pharmacies and dental practices are already struggling. The Lloyds pharmacy in the Kingsland Centre has reached capacity and staffing problems. 40% of Thatcham residents must travel outside the town for dental services. There is a shortfall for this shortfall. Local GP practices are at or beyond capacity – the Burdwood surgery had to close its doors to all patients in December as a force majeure because of unmanageable demand.</p> <p>There is no evidence that WBC or the developers have involved Berkshire West Integrated Care Partnership in offering services at the proposed development site, say 1,500 to 2,000 sq m that would involve the relocation of an existing practice.</p> <p>In summary, the 450 sq m site suggested is too small to be viable, and there seems to have been inadequate consultation so the proposal is unsound.</p> <p>1 <u>Transport</u></p> <p>The plan for an exit at the north of the site onto Harts Hill Road will have a significant impact on traffic load and road safety. Ash, Chapel Row and Bradfield Southend. Most cars have traffic SatNavs that will quickly redirect them away from a site each morning and evening. There is no allowance for traffic calming measures, pavements, or a change in speed limit. The road has frequent bends, ice patches in winter and witnesses multiple accidents, some fatal.</p>

	<p>The inclusion and siting of a car park on Harts Hill Road will result in yet more traffic as well as night-time anti-social behaviour. Because the whole NE Thatcham Development site is a ribbon development at a distance from Reading, Newbury and other nearby towns, it will be overwhelmingly by car. Public transport only accounts for an exceedingly small fraction of commuting to work and is further away than from most parts of Thatcham and the bicycle stand at Thatcham station is always underutilised.</p> <p>1 <u>Concerns about Process</u></p> <p>There have always been alternatives to the proposed NE Thatcham Development. For example, restricting the site to residential use (as recommended by the technicality by the Planning Inspector in 2015) and adding Henwick Park (acknowledged by WBC to have been overlooked in the current plan) and multiple village sites (there are 60 villages in West Berkshire, many of which have a village house, village shop, post office, bus service or church). I suspect that WBC have taken the easy option of agreeing to the proposed development.</p> <p>The Thatcham Strategic Growth Study was commissioned by WBC and contracted to David Lock Associates and Stantec. A Freedom of Information (FOI) request from a parishioner in 2021 established that £100,000 was, in turn, paid to WBC by the Development Corporation, A2Dominium, Donnington New Homes, and Ptarmigan. WBC acknowledged that they had not previously acknowledged this information. There is an obvious conflict of interest. I have since spoken to a Stantec professional who confirmed my suspicion that they had not previously acknowledged this information but only 'all things being equal', 'he who pays the piper'. How was the decision made to allow a back payment? Why is this information in the public domain?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Stephenson, John
<p>Consultee Full Name</p>	Mr John Stephenson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS594
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p>	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	01/03/2023 22:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	I object to the WBC LPR Regulation 19 proposal as it is unsound and, on a number of levels, directly impacts me. Education - lack of relevant infrastructure for a 6FE facility The provision of any education infrastructure is either unclear or contradictory. There is no complete description of p to sixth form.. The plan is unsound. Where is there no research on the impact of traffic levels during term time? No definition for the structure of the Nursery education plan The detail on Primary schooling appears to have no basis on research, therefore how can any plan or budget be dev The development will adversely affect secondary school education choice in Bucklebury. Currently children can opt f there is oversubscription to a school those closest are given priority. This will effectively mean that Bucklebury pupils to The Downs.

My family have lived here since the 60's. I am concerned that our choice of secondary school will be severely constrained. The strain on schooling may have a negative impact on the QUALITY of education provision to my family and others.

The planning for provision of a secondary school appears to be a mess and is therefore unsound

There is no modelling on pupil numbers

The location for the school has not been identified

Any school with less than 6 Form Entries is NOT sustainable

Funding is not clear on whether or how the council's obligations can be met

The chronology of funding provision is not clear

West Berks Council is an Education authority and has a duty to make arrangements for suitable school provision. The requirement. The provision of sports fields by WBC and the proposed development has NOT been met. There has been no funding OR suitable locations.

Sportsfield Provision -

Where is the flat ground for the sports fields? The proposed development area is on the side of a ridge. How does this affect playing fields?

Where is the funding for the fields as the developer has retracted their offer on the secondary school?

Transport - Unsound modelling, planning and evaluation

The scale of the development will introduce a large number of new vehicles to the roads. The planned exit to the North will result in large quantities of vehicles onto small village roads. Where is the modelling on traffic impact? The impact on safety, pollution and noise is immense.

The Transport Assessment says at paragraph 3.26 : 'The access arrangements for the northern end of the NET site will be provided (with right turn lanes where appropriate) on both Floral Way and Harts Hill Road. Where is the modelling for this proposed access?

Why has a new car park been planned for Harts Hill? What is the rationale and who is it supposed to serve? Was there any consideration of carpooling behaviour?

The Sustainability Appraisal Objective 4 / Strategic Environmental Assessment includes the statement: "To promote all forms of safe and sustainable transport." The Council assessment is "The policy is likely to have a Positive Impact on transport." How can this be so when we know that there will be a large increase in traffic volume? What are the traffic calming policies?

Another Council Transport Assessment states: The policy is likely to have a significant impact on walking, cycling and public transport. The plan should be designed with these in mind. Looking at the plans I see little evidence to support the assessment. How is this to be achieved and attained? It looks like fine words, but once again no policy or planning.

Healthcare - no strategic planning or matching proposals to the plan therefore the plan is unsound on this matter

Healthcare in the area is already on its knees. I have long waits for hospital and GP appointments. For example blood tests. Adding 1500 dwellings to the area is almost beyond belief in terms of medical support. Where is the healthcare provision in the future?

There is no realistic chance of a new surgery being established in Thatcham, The proposed 450 sq m. surgery cannot be a standalone operation and too expensive to be a satellite office. Even the satellite office would be unable to cope with the planned development. The development appears to believe that existing surgeries can take the new patients. This is not a realistic engagement with health providers PRIOR to the plan being completed.

Dental Care planning is as poor as the general health items above.

Personal Note: One of my sons is at present UNABLE to register with a dentist. How can dentists deal with the proposed increase in population? Why has there been no dialogue with the local dental practices?

There will be a significant NEGATIVE impact on the environment. There is no evidence of serious investigation into the impact of the proposed development.

The proposal claims a positive impact on the environment. How can that be?

Massive pressure on the Bucklebury Plateau Biodiversity Opportunity Area through increased traffic and a 4000 increase in population.

A development crammed right up against the North Wessex Downs AONB is obviously going to have a damaging effect on the AONB. There will be a loss of major areas of adjoining open countryside. The North Wessex AONB was not envisaged as an island of green space.

Legally protected wildlife is known to be present on the site. Minor areas of grassland will not mitigate the impact of the development on the AONB for new residents.

The LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability. The plan states by SP17, to have new routes into the AONB.

Water and sanitation

The Thames Water infrastructure is at its limit serving the existing community. Where is the planning to provide for the proposed increase in population?

	<p>Where is the modelling on water and sanitation usage and the impact on sewerage, river water quality and drinking</p> <p>Alternative development sites</p> <p>Where is the evidence that existing brownfield sites will not meet the requirements?</p> <p>In conclusion, the Regulation 19 Proposal has a massive lack of planning, clarity, funding and explanation and is the</p> <p>I am happy to become involved in the discussions on the proposal should the council wish to involve me.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Holland, Russell
<p>Consultee Full Name</p>	Russell Holland
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS266
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	25/02/2023 17:26:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<p>My name is <redacted>. I am a resident of Bucklebury Village and live within the Bucklebury Conservations area.</p> <p>I object to the Local Plan review proposal to build between 1500 and 2500 houses to the North East of Thatcham. W housing will be required in West Berkshire during the review period and beyond, I believe that there are elements of that will damage quality-of-life for both the current and future population of the area.</p> <p>I also believe that The Plan has a strong potential to do lasting damage to the rich natural environment that we enjoy to for future generations.</p> <p>The following objections reflect my perceptions of how the Plan will impact me as an individual and the wider commu</p> <p>Transport</p> <p>This large development of homes, many of which will have multiple car ownership, will significantly increase the num numbers of car journeys made each day.</p>

While it may be anticipated that the vast majority of additional journeys will be accommodated, though not without the main A4 road, The Plan will inevitably increase the volume of traffic on the network of (country) roads to the North and South of the area. These roads:

East West:

- Cold Ash to Chapel Row
- Hermitage to Chapel Row
- Bucklebury Village to Frilsham
- Chapel Row to Bradfield Southend
- Hermitage to Yattendon

North South, including but not limited to:

- Fanny's Lane
- Briff Lane
- Pease Hill and others

These roads and wider the network of lanes in the Pang valley are already under stress. Increased traffic volumes, in addition to the appearance of inadequate maintenance have created hazardous and unsightly highways.

The hazards include:

- Verge erosion that has extend the carriageway beyond the limit of the metalled surface which in turn has created dangerous conditions for cars can or may be forced to drive.
- Significant pot holes and ruts in the road surface. This creates a particular hazard for cyclists that chose to ride in the area.

The proposed development will increase traffic volumes, exacerbate the deterioration of the road system, increase the noise and reduce the aesthetic qualities of the AONB in which they are located

A previous Local Transport Plan (WBC 940, by Adams Hendry) indicates that the "Highways and Transport Environment" is responsible for delivering a sustainable transport system. Whether this goal is being met in the Pang Valley is questionable. The proposed development is almost certain to exacerbate problems with attainment.

Additional objections related to transport:

- Any increase in east bound traffic will lead to congestion and to an increase in the already, hazardous conditions which exist at the south east corner of the Englefield Estate
- The potential for increased congestion and pollution at the Thatcham railway crossing. Inevitably, this may increase the traffic at Brimpton and addition strain on routes to the A339 road to Basingstoke.
- The apparent nature and extent of the proposed development will make short car journeys a necessity to access schools and leisure activities. Again, more pollution and congestion.

Healthcare

I am registered at the <redacted> and have previously been registered at both the <redacted> and <redacted> practices. The <redacted> practice appear to be stretched and enquiries to a peer group suggests that this is also true of the Thatcham practice.

I am not clear how the measures in the proposed plan will deal with the Healthcare needs of the increased population and a GP practice falls considerably short of what I would consider to be a joined up solution for a community of this size.

Even on the basic offer in the Plan, the difficulty in creating a new GP practice appears to have been underestimated. The existing practices will be stressed further.

The same concerns exist in the context of dental care. I use private dental care because there appears to be a shortage of dentists. I'm told that new arrivals in the area have to travel further afield to receive dental care. There is little in the proposed plan to suggest that adequate provision will be made.

Education

At present, children in Bucklebury have options both at primary and secondary level. The proposed Plan does not mention that additional schools will be provided for an increased population and my fear is that existing schools will become unreasonably crowded for both parents and children. I object to either of these eventualities.

The Environment

I live in the AONB and within the boundary of the Bucklebury Conservation Area. I believe that both should serve an

- A near pristine amenity for the enjoyment and well-being of people in the area
- A means of protecting and maintaining diversity in flora and fauna
- A way of preserving and sustaining landscape and important rural activities.

I have no wish and there can be no mechanism to restrict access to these areas but a development of this scale, with a provision for leisure and social activity, on the edge of the protected area will inevitably lead to degradation and loss

The importance of Bucklebury Common should not be underestimated. The work that is being done to preserve its status is important and the siting of a development on the scale of that which is proposed is certain to impair and devalue it. A recent Conservation area notes potential harm to the public and natural realms. These include:

- Degradation of grass verges
- Degradation of the surface and the edges of the metalled road
- Damage to and shrinkage of the grassed/planted traffic island in the centre Bucklebury village.
- On street car parking.
- Loss of flora and fauna due to the attrition of specific species and attrition in the spaces in which flora and fauna can thrive
- Loss through unsustainable levels of footfall.

Bucklebury Village attracts and welcomes visitors that come:

- To appreciate the environment that is the Conservation Area and surrounding countryside.
- To access the junior football coaching that takes place on the playing field.
- To use the Victory Room which hosts clubs, classes and a other appropriate activities

These amenities are used in a manner and with a frequency that sustains their fabric and respects the needs of village

I believe that the proposed development, as specified, is light on support for social and physical activities and if that is the case on Bucklebury Village, on the Conservation area and on the surrounding countryside will be excessive and damaging

General Comment

Previous Structure Plans have spread necessary development across multiple locations. The approach appears to have

However, the development of what is effectively a new settlement without a centre, where the amenity is missing or inadequate (e.g. health, education, social and shopping) is a concerning prospect. One that will have a negative impact both on the current residents and on the new comers and one to which I object.

I am happy to discuss these comments in the context of this review should that be a requirement

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination

- * Yes
- * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kelly, Maria
Consultee Full Name	Maria Kelly
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS480
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 14:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I object to Policy SP 17 in this plan, the proposed North-East Thatcham Development, on the following grounds.</p> <p>EFFECT ON THE ENVIRONMENT</p> <p>I do not accept WBC's claim that there would be a "net biodiversity gain" and I believe the basis for that claim is unconvincing and lacks meaningful evidence. The small areas of "community park" and "greenway" proposed for the development's boundaries are not sufficient to offset the loss of deer and foxes, hares and badgers and owls. I have seen artificial creations like this beside housing estates and they do not support the same varieties of wildlife. It seems ridiculous even to suggest that building houses over an area of farmland and woodland will do anything to improve the range and varieties of wildlife in that area.</p> <p>EFFECT ON THE BUCKLEBURY COMMON AONB</p> <p>WBC has a legal obligation to "conserve and enhance" Areas of Outstanding Natural Beauty, but its SP17 Plan proposes to do so alongside a small AONB which local volunteers are struggling to maintain and restore following the impact of the crowds during the 2020 COVID lockdown. Even the responsible walkers and cyclists had an adverse effect, the increased numbers of people and ground-nesting birds and inevitably trampling on more plants. The irresponsible ones also trampled new paths, left behind dog excrement. The population of the proposed NE Thatcham Development would bring back all of the damage to the AONB, as a permanent thing. SP17 does not even acknowledge this inevitable and unpreventable consequence.</p> <p>The new population would clearly use the lanes across the Common as a "rat-run", adding to the large numbers already in the proposal's Transport Assessment, any assessment of the likely impact of this, or any plan to limit or prevent it, is already causing harm to the AONB's wildlife.</p> <p>So I think the SP17 proposal is unsound and contrary to WBC's legal obligations regarding AONBs.</p> <p>EFFECT ON HEALTHCARE</p> <p>The local surgeries are overloaded and struggling to cope with current patient numbers. If the SP17 development were to proceed, more would be needed but only a very small one is proposed and I can see no evidence or reassurance that the NHS could cope. This makes the proposal unsound.</p> <p>EFFECT ON ME</p> <p>I have a >personal details redacted<. I moved to Upper Bucklebury ten years ago, needing for genuine reasons of health and peace of mind of noise and building in the urban area in which I lived previously, but still remaining not too far away from my children and grandchildren. The peace and quiet of this village has helped my condition, being able to enjoy my garden and the calm of the surrounding countryside. I have a total of 46 different bird species in my garden, the most recent being a tawny owl who visits regularly. The quiet and peace when I am able to visit it.</p> <p>For the reasons given above, the creation of the SP17 development would clearly increase the numbers of vehicles, through the village, making it a busier and noisier place, while the increased numbers of pedestrians, cyclists, off-road motor vehicles and the Common would reduce the diversity and volume of its wildlife. I would find myself no longer living in the calm and peace that has benefitted me these past ten years and I would find less enjoyment in watching the wildlife in my garden, because the noise and traffic would be too much for me.</p> <p>My medical condition, coupled with my advancing years, means that I am also very worried over the impact that the development would have on healthcare services.</p> <p>I strongly believe that the North-East Thatcham Development plan, if permitted to proceed, would do great harm to the AONB and in its surrounding areas, while also diminishing the quality of life for many of the area's residents.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McQuaid, Grainne
Consultee Full Name	Mr Grainne McQuaid
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS335
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 13:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>I am lodging my objection to the LPR (Regulation 19) as I find the proposal to be unsound.</p> <p>I have no knowledge of planning laws, and the huge amount of information available on LPR Regulation 19 is completely overwhelming. I find many of WBCs arguments promoting the benefits of this development unsound. I am lodging my objection on the grounds that the development will have on me, my children, my community and the local environment.</p> <p>Traffic: This will have a significant impact on traffic in the area, especially on the routes in and around Thatcham and will increase the traffic through all of the surrounding villages of Upper Bucklebury, Cold Ash, Chapel Row, Bradfield South and Thatcham. With the plan to have an exit at the north of the development site onto Harts Hill Road and a roundabout on Harts Hill Road, this will lead to an increase of accidents on an already dangerous road and also lead to congestion on the A4. I'm also not sure what the new road is for?</p> <p>WBC say that there is likely to be a positive impact on road safety (as safe travel will be critical to the design of the site) but I think this can be the case.</p> <p>Schooling: There doesn't appear to be a clear detailed plan for the provision of nursery or early years education. For secondary education, Kennet School is already oversubscribed. If the development goes ahead, children from the development will be limited in getting into Kennet School. Children from Upper Bucklebury will be limited to going to the Downs.</p> <p>Although the LPR provides for a new secondary school being built, it's not clear where it will be located, or the number of places, or how clear if the proposed funding is sufficient to meet this cost or the timing of this funding.</p> <p>AONB and the destruction of wildlife: This development would be a massive over-development of the countryside in the area. There would be an increase in dog-walkers, quadbike/scrambler riders, dog fouling and litter. The increase in dog-walkers and dog fouling etc. would have a huge detrimental effect on the area...not to mention the destruction of wildlife.</p> <p>Contrary to WBC claims in Regulation 19, there is every reason to believe that this development will have a significant impact on the local environment.</p> <p>Medical Practices: Although there are proposals for a new GP Surgery, a development of this size should have a Health Impact Assessment carried out to assess how the development's design has considered the impact on the health and well-being of existing and future residents. It appears to have been done.</p> <p>Also, it doesn't appear that WBC/developers can convincingly evidence that they've liaised with the local health care providers to ensure they can cope with the extra burden of these new houses.</p>

	While I understand the need for more housing, WBC and the developers appear to want to build as many houses as possible of the consequences that a development of this scale will have on the health and education services, traffic and environment area.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Doggett, Carol and Colin
Consultee Full Name	Carol and Colin Doggett
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS331
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 11:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Transport Massive increase of traffic on all our roads Roads already in a dreadful state of repair Increase in traffic through the villages especially Bucklebury, Cold Ash and Bradfield No pavements, street lighting Increased perils to pedestrians, cyclists and horse riders More wild life road kill - deer, muntjac, pheasant The Common Road from Upper Bucklebury to Chapel Row is particularly fast and The Avenue has had a large number of accidents Healthcare Local GP surgeries already overstretched. Where will the new ones be sited? I trust not using more greenfield sites A Hospital would need to be built as Reading and Basingstoke are overloaded. Where would that be sited? Dental Surgeries, again already full to the brim. No discussion with any of the above have been instigated Only 3 small pharmacies in Thatcham that cannot cope with demand now Promises have been made with previous developments that this would be addressed but nothing has ever been done Utilities After years of correspondence and complaints to Thames Water we have at last got a reliable Pumping Station so water comes out. However, this has brought on another problem of old and weak pipes resulting in numerous pipe bursts, supplies. Thames Water are overstretched allowing leakages to carry on for hours (sometimes days) and then just cover Elastoplast on the pipe which is never permanent. A development of this size would negate any benefit we have gained Sewerage Needs updating as the present stations are old and inefficient and will not cope with the development. Any leakage will pollution Environment The surrounding area has a wide, diverse and important range of flora and fauna which will be lost forever As the population grows we need more greenfield sites for farming to feed us, not taking them away What is the point of have protective status, i.e. SSSI's and AONB's, if they can be overruled and ignored when it suits</p>

	<p>The increased footprint over Bucklebury Common and the surrounding areas will damage the balance of wildlife. It will affect walkers and horse riders who need to avoid the now very dangerous, busy local roads</p> <p>Education Schools already oversubscribed so will need to build more. Where? Greenfield sites again? Promises have been made with previous developments that this would be addressed but nothing has ever been done. No research or plans have been made to fulfil the Council's duty to make arrangements for suitable school provision.</p> <p>Local Amenities Where will residents of the development shop? Thatcham only has 3 small supermarkets and the rest of the units are hair dressers Where will these people park? Leisure Facilities Very restricted and no plans to address this</p> <p>In conclusion this beautiful area where I have lived for over 60 years is gradually becoming a concrete jungle with no quality of life or nature. The countryside, flora and fauna are being eroded with thousands of houses and flats being built. Promises made to update this and upgrade that, build schools etc but NEVER have any of these promises been fulfilled. The area is being destroyed by increase of use especially with anti-social behaviour, motorbikes, 4-wheel vehicles who have already damaged the Common and people who have no idea of the Countryside Code, resulting in loss of livestock to farmers and damage to the land. It breaks my heart to see this lovely area destroyed and I take my life in my hands whilst walking or horse riding. I don't want these houses built.</p> <p>No one has made any attempt to address the problems of health and education and certainly have made no attempt to consider what this development will make on the area.</p> <p>There is also the statement in December by Michael Gove that the housing number should now be an advisory starting point. So, please will you listen to the voice of the people and reject this proposed development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Newby, Carol
<p>Consultee Full Name</p>	Carol Newby
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS263

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	With reference to the above, I am writing to strongly object to the proposed development as I find it fundamentally un On 6.12.22, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement on the Standard Method for calculating the housing requirement for a local authority (and which has been used by West Berkshire Council for the plan), should now be an advisory starting point and not mandatory. The resulting ongoing consultation has a f

	<p>an area when assessing how much housing can be accommodated. Unlike a number of other Local Authorities, West Berkshire Council has the opportunity to pause the plan making to await the outcome of the consultation with its updated planning guidance.</p> <p>The land north of Floral Way has maintained the gap between Thatcham and Bucklebury thus ensuring a rural environment and overall wellbeing. The proposal all but eliminates the separation and will visually and socially break natural communities and well established planning norms which have been consistently applied in the recent past. It is incomprehensible that this is the case.</p> <p>The proposed development abuts Bucklebury Common and the North Wessex Downs AONB. This development will have a negative impact on these special environs. Bucklebury Common is protected because of its flora, fauna and its situation. It contains rich habitats that are known to be home to legally protected wildlife. The plants in and bounding the AONB will suffer and be under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorists and this will inevitably increase with the proposed development adjacent to it.</p> <p>There is no evidence in the background documentation provided by West Berkshire Council to support claims that the development will be in the environment. In fact, it is much more likely that it will have a significantly negative impact. The plan's own Sustainability Statement will have a negative impact on environmental sustainability - 'The site is a greenfield site and therefore, would result in a loss of sustainability which would be mitigated.' Nowhere in the plan is any detail given on what those mitigation measures would be or how they would be implemented to undefined 'community parks'. In addition, the plan states its intent to provide a green infrastructure network to 'take account of the AONB' to 'facilitate connection to the AONB', which will inevitably lead to increasing human pressure on the fragile ecosystem.</p> <p>In addition, the proposed development on a sloping site with associated runoff from concrete and tarmac paved areas will contribute to a greater risk of potential future flooding events along the river valley (A4/Bath Road and Thatcham).</p> <p>Overall, the focus of the SP17 policy is to build as many houses as possible in a small area of the countryside, with little regard to investigate, analyse and systematically address any potential consequences.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Coulson, Bernard
<p>Consultee Full Name</p>	Bernard Coulson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS267
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 16:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I strongly object to the Thatcham NE Development as currently proposed because it is unsound for many reasons, some of which are given below.

	<p>The scale of the proposed development is far too large and poorly thought through in terms of its negative impact on the rural environment, on protection of the Area of Outstanding Natural Beauty and the ecological value of that area, and traffic issues.</p> <p>APPEARANCE Blocky and visual in the extreme given the relief of the landscape. Utterly discordant. Not well thought through.</p> <p>PROTECTION OF THE AREA OF OUTSTANDING NATURAL BEAUTY AND ITS ECOLOGICAL VALUE The West Berkshire Council LPR states the intent of SP 17 is for more people to take advantage of the landscape. This is crass and misguided given the fragility of the ecosystems involved and the even before proposed further development. Mitigation by way of dedicated green areas, so called, is flimsy and casual. Not well thought through.</p> <p>HEALTHCARE There appears to be no evaluation and consideration of potential issues arising from the development proposals by the Development Consortium and local general medical practices. It makes no financial, organisational or geographic sense to set up branch surgeries. There is no detail available covering strategic healthcare planning. Not well thought through.</p> <p>EDUCATION The provision for primary and secondary education is not clearly defined in the Local Plan Review. This breaches the duty to provide education facilities. The proposed development exacerbates this inadequacy. Moreover there is no evidence that school funding is sufficient to provide education following any increase in pupil numbers. Not well thought through.</p> <p>TRAFFIC ISSUES The proposed development will see a greater volume of traffic using rural roads that were not designed with that in mind. It will transform roads currently given Quiet Lane Status, particularly so in the Upper Bucklebury area. It cannot be maintained that the proposed development will have a positive impact on road safety beyond the site perimeter. Where are the details for the north of the site onto Harts Hill? Not well thought through.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes</p>	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Puri, Anoup
Consultee Full Name	Anoup Puri
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS674
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 20:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

The following are all valid reasons for my objections.

Roads - negative impact via a massive increase in cars and car journeys from the proposed new development

There is a lack of modelling or plan for the traffic that will be generated from the development and pushed onto Harts Hill i.e. through Upper Bucklebury, Cold Ash, Chapel Row and Bradfield Southend. The route through Upper Bucklebury and the M4 (J12 & J13) and Reading. Improving a few junctions on the already busy A4 will not solve this. There will be a negative impact on the area. Negative impact on the environment.

Speeding is already a huge issue in our local villages, and particularly on the road that runs from Harts Hill through Southend to Common Hill. Nothing is shown in the plan help prevent this issue or help control the dangerous speeding. This is a Negative impact on local villages. Negative impact on environment due to an increase in the extra pollution from litter dumped out of car windows. I regularly carry out litter picking on the main roads through Upper Bucklebury and Southend. Negative impact on road safety, both for road users and pedestrians. There will also be a negative impact on many more road kills (foxes, Deirdre, squirrels, pheasants, et cetera et cetera).

The junction where Union Road meets Common Hill, and where Common Hill then meets the A340 can not cope with the extra road traffic. This will be made much worse by the extra road traffic if the new houses are built and this route via Reading and the M4. Negative impact on road users. Negative impact on environment.

The final stretch of Union road where it meets Common Hill is not suited for additional vehicles. It is already narrow and needs improvement. Negative impact on road users. Negative impact on road safety. Negative impact on environment.

There appears to be little concern for other environmental impacts additional cars will cause - eg traffic noise, increased air pollution, racing on the straight roads through the common for example. Negative impact on residents in local area. Negative impact on environment.

There appears to have been very little thought on how to provide public transport so that not using a car is a sensible option. Negative impact on environment, local population. Negative impact on the environment.

What is the car park on Harts Hill for if use of Harts Hill is going to be dissuaded? Negative impact on local population. Negative impact on road safety as cars use country roads rather than A4. Negative impact on environment.

I understand the SEA states the development will have a positive impact on walking, cycling and public transport. This is how. Really seems that someone is just dreaming up some of these so called positive impact statements without any substance. Significant improvement in public transport is needed to stop creation of driving "rat runs". Negative impact on local population. Negative impact on environment.

The roads around Thatcham station and the train barriers can hardly cope at present. The traffic queues are already long. There will be a marked increase in the pollution from road traffic on the cars are stopped at the barriers. There is insufficient capacity to cope with the increase in People using the trains. I don't believe the residents of the new development will be walking to the station. They will be using the cars to drive to the station and hunting for car park spaces.

Healthcare - negative impact

It is already hard to get timely GP appointment in this area of West Berks. Adding thousands of additional people to the area will make the situation worse. Relying on current GPs in Chappel Row and Thatcham and local villages will not work. It will also put more pressure on the A4 to get to proposed GP surgeries i.e. to Chapel Row. Negative impact on local population.

Proposal for GP surgery to be built isn't clear. Eg funding, finding suitable qualified medical team doesn't appear to have been considered. GPS, which surely would be the first step? Negative impact on local population.

How long would it take to get the surgery built, staffed with qualified medical people and running? Acknowledged it is a long time. GP surgery. Surely needs to be open before housing is completed. Negative impact on local population.

This new development will rely on GP surgeries with a high elderly demographic, with higher reliance on healthcare. This will have a hugely detrimental effect on current users. Negative impact on local population.

Environmental - negative impact

- obviously this development will have a huge detrimental impact on the local environment and ecology simply by paving over a large part of the countryside. Negative impact on environment, ecology, the aonb, local countryside, local native and protected species, climate change.

With the open land covered over by the new build, There will be less space for the rainwater to soak into the ground. This will lead to increased runoff downhill, and more water being drained towards the Kennett and Avon Canal.

- there will be significant protected species that will be negatively impacted regardless of measures put in place. Negative impact on local population.
 - no evidence presented that it will have a positive impact, as appears to be stated in the proposal.

To replace the existing countryside with man made country parks is an expensive way to fight nature. This appears to be a way to leave it as countryside. Negative impact on local environment and ecology.

- how will the country parks improve ecology and biodiversity? Negative impact on local ecology.
 - the development should make an ecological improvement to the area, this plan doesn't clearly show any benefit. Negative impact on local environment and environment.

- a development of this size on a greenfield site will have a negative impact on national efforts to prevent climate change and against climate change.

	<p>- a development of this size on a greenfield site will have a negative impact on local efforts to prevent climate change climate change.</p> <p>Education - negative impact The local schools are already over subscribed. There is also a lack of suitable well qualified new teaching staff. Neg population.</p> <p>Legal requirement - Inconsistent with current central govt guidance - central government has removed the legal requirements for specific housing numbers to be met by councils, these a to understand why WBC is continuing to force through this huge development? What are the other external factors m build between 1,500 and 2,500 houses in this area where roads, public transport, GPs and schools are already crea - the removal of the legal requirement makes it a great opportunity to pause and produce a properly put together, mod sensible for this area.</p> <p>Character of the local area - this development will effectively make Upper Bucklebury part of Thatcham, eroding Upper Bucklebury village's unio potential to open up further developments that erode the countryside that defines and spearates the various towns an another. Ensuring villages remain just that, villages, is an important part of this part of West Berkshire. This proposa the character of the ara and on the local population.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Williams, Tim
<p>Consultee Full Name</p>	Tim Williams
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS287
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	27/02/2023 23:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The health authorities have not been consulted in preparing this plan. The relevant water company has also not been
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The proposal does not take account of the revised targets announced by Michael Gove in December.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No

Please give reasons for your answer	Neither the water supplier nor the local health authority have been involved in preparatio of this plan.
4. Proposed Changes	<ol style="list-style-type: none"> 1. The numbers of houses being built should be reconsidered in light of revised guidance 2. Thames Water need to be consulted and to produce plans to manage the water and sewage needs 3. The relevant local health bodies should e consulted with over the viability of health provision in the plan, 4. The plans for education facilities should be reconsidered in light of the government's advice and that of West Berk 5. A thorough ecological assessment should be completed before outline planning is granted 6. The transport plan needs to be more realistic and consistent with the council's own estimates.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I am able to state the case in more detail
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holland, Sheila
Consultee Full Name	Mrs Sheila Holland
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS303
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 18:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am a resident of Bucklebury Village. I wish to object to the plan to build 1500 to 2500 houses to the North East of Thatcham. My objections are: 1. This large development is equivalent to a new settlement not an addition to the existing town of Thatcham. 2. In a settlement of this size all entry and exit movements will be by car. Without a centre and without adequate amenities, residents will have to "go somewhere" to shop and to access services (schools, medical care, dentists and recreational amenities). This will add to congestion and pollution and will be detrimental to the countryside and to the general environment. 3. There will be direct access from this development to country roads which are currently in poor condition with potholes and poor surfaces, reflecting inadequate maintenance by West Berks Council, and which will deteriorate further with increased traffic volumes. 4. More cars and more traffic movements will increase the congestion that already occurs at the Thatcham level crossing, the Brimpton railway bridge and on all other roads in the area. 5. The proposed plan is not specific in its description of the amenities (Healthcare, schools, shops and an adequate range of recreational facilities) that will be provided to support this new settlement. Without adequate provision existing amenities in the area will be further stretched.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hughes, David
Consultee Full Name	Mr David Hughes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS366
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 09:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to object to NE Development on the following issues:</p> <p>Increased Traffic.</p> <p>The fact that traffic from the new development will exit at the North of the site onto Harts Hill Road. This means this traffic will be routed through Bucklebury, splitting between Cold Ash and Upper Bucklebury and Chapel Row.</p> <p>In fact you are aware of this "some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury"WB area, there will be some serious accidents. It will be a default route if traffic is heavy on the A4 to Reading, making it a dangerous route to Bucklebury. Presently it can be dangerous to join Harts Hill Road, this volume of traffic will make the task almost impossible for cyclists and walking route and this will no doubt cause some accidents if this development goes ahead. This cannot be considered as a safe route.</p> <p>Access and Junctions.</p> <p>The transport assessment shows no modelling results for Harts Hill Road, why is this?</p> <p>Car Parks</p> <p>Any new proposed car parks on Harts Hill Road will add traffic to the area, and could result in night time anti-social behaviour.</p> <p>Accidents and Road Safety</p> <p>Any development of this size will NO doubt increase traffic and as a consequence have a dangerous impact on walking routes.</p> <p>Healthcare.</p> <p>A huge development this size will mean the occupants of the houses will need access to Doctors Surgeries, all 3 practices are currently stretched with approximately 2000 patients per GP. This will be the case for the residents having to access already over capacity practices. There is no provision for a viable primary care medical facility.</p> <p>Environment</p> <p>Damage to Bucklebury Plateau Biodiversity Area, in particular the Common.</p> <p>This development is a Major Greenfield development of North Wessex Downs AOB. Presently there are wild deer and other wildlife on the development will rob them of their habitat and cause more collisions with wildlife on the roads with the new increase in traffic.</p> <p>There is NO evidence this development will have a positive impact in fact quite the contrary there will be a significant negative impact on the environment.</p> <p>Opinion.</p> <p>To target a greenfield site is extremely shortsighted and taken as the easy option but the impact would be enormous.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	In my opinion the development should be targeted on a "Brownfield site", an area already developed that would benefit e.g Colthrop area.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bridle, David
Consultee Full Name	David Bridle
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS551
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 21:00:24
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>With regards to soundness, the small Town of Thatcham does not 'need' additional 2500 homes. The Local Authority needs to be doubled in size without appropriate provision of services. Such a development is not sustainable as the new homes will drive vehicles to do shopping, access services and ferry young children about. Upgrading a road to a dual carriageway and the existing Town allowing for a cycle way does not mean many residents will use a bicycle to go shopping!</p> <p>With regards to soundness, the Local Authority has not properly assessed that the Town needs to be doubled in size to provide all services required to sustain it. The plan is not deliverable over the plan period as there cannot be reliable assurance that all phases will be sold allowing for the next phase to be built. The Primary schools would need to be built before the housing will need to be retail zone allowing for Aldi / Lidl within the development to make it sustainable. There is no such zoning in the town which will be driving through the town and Floaral Way to Newbury where there are low cost shopping options as there are no shops in the East thus exacerbating the air pollution issues that already exist. This is therefore NOT sustainable development!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>A previous engagement event hosted by the Authority's external consultant took place where the host effectively asked residents to be located where without considering what the adverse impacts there will be on local residents. The planned development of a significant and excessive number of homes exclude any mitigation for enhanced traffic flows in all surrounding residential areas which has a pre-school and no safe crossing points and there are no specific 'improvements' specified / detailed for the Proposed 'park' within the development is far from most of the Town which means most will have to drive to access it. Where are the specific improvements to all the poor quality play areas / parks and other areas of land?</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Clarke, John
Consultee Full Name	John Clarke
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS242
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 21:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I wish to object to the above scheme [email subject] for the following reasons.</p> <p>The development between Bucklebury Common , it's villages , and Thatcham would have a significant negative impact on an AONB and the people living there now and in the future.</p> <p>TRANSPORT</p> <p>The plan to put an exit on the north side on to Harts Hill would send traffic towards Upper Bucklebury and Chapel Road congested and potentially dangerous . There have been no modelling results for this exit and the second exit on to F...</p> <p>A new car park has been proposed off Harts Hill .This entrance will add even more danger to drivers using Harts Hill at time antisocial behaviour already experienced in the car parks on the Common.</p> <p>The Safe Travel and Road Safety design detail has not been clearly demonstrated. Similarly the positive impact for the public transport claimed in the council assessment has not been proven.</p> <p>HEALTHCARE</p> <p>Neither the Council nor the developers appear to have arranged or published a Health Impact Assessment to the proposal. Because of the UK general shortage of GPs identified by the NHS Berkshire West Commissioning Group there is no practice being established in Thatcham or West Berkshire in the foreseeable future. Existing practices in the area are at service levels.</p> <p>There has been no approach by the WBC or the developers to any local GP practice to discuss an appropriate branch and manpower. The objective to improve access to the health service component of community infrastructure with a view to has not been met.</p> <p>ENVIRONMENT</p> <p>There will be collateral damage to the Bucklebury Plateau Biodiversity Area and it's ancient woodlands and heaths, and the impact on the landscape by local communities.</p> <p>A major greenfield development in the broader landscape setting of the North Wessex Downs AONB will forever impact on the landscape by local communities.</p> <p>The development will cause detrimental impacts to legally protected wildlife known to be present on the site. The vag... will not be sufficient mitigation.</p> <p>There is no evidence to support claims that SP17 will have a positive impact on the environment. There is every reason to believe a significantly negative impact.</p> <p>Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there be spill over on to other areas.Indeed the LPR states it's intent for SP17to drive additional traffic (people and cars) into the AONB. The man... Common is explicitly focused on NOT increasing human pressure on the fragile ecosystems they are working to rest...</p>

	<p>The overall thrust of the SP17 policy is to build as many houses as possible in a small area of countryside, while making the environment - human and natural - will be improved or mitigated.</p> <p>EDUCATION</p> <p>The provision for education from Nursery , Early Years, through Infant to Secondary education into clearly defined with is no coherent end to end plan : this breaches the Council's obligations to provide education facilities for children. With large new housing development cannot proceed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hamilton, Abigail
<p>Consultee Full Name</p>	Abigail Hamilton
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS443
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	28/02/2023 21:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>WBC LPR Regulation 19 Objection</p> <p>As a resident of Thatcham I am writing to lodge my objection to Thatcham North East Development based on the negative impacts this will cause as the proposals are unsound. Firstly as a resident next to Pipers Way we have already seen increased traffic due to the railway crossing. With the addition of a minimum of 1500 houses and the congestion on the A4 it will cause more traffic along Pipers Way and surrounding roads such as Falmouth Way which could become a rat run to skip any congestion on A4 from Pipers Way and the traffic calming down Falmouth Way will become a dangerous chicane.</p> <p>The proposed traffic management is insufficiently and irresponsibly considered and will adversely affect road safety by channelling additional volumes through Falmouth Way and occasionally Agricola Way.</p> <p>Rather than increase opportunities for walking cycling these the proposals will have an adverse affect on current levels based on increased traffic and congestion. The council has failed to demonstrate how these increased opportunities will be created across all residents in the local area.</p> <p>Secondly I would like to raise objection in relation to the impact this development will have on local environment. Wildlife wandering in the fields across from Colthrop Industrial Estate cross the already busy road- additional traffic will create further loss of wildlife. I also frequently use the footpaths as do others from Thatcham which lead up to Bucklebury the loss of the beautiful countryside on our doorstep will be diminished and will in fact turn Thatcham into an overdeveloped area and could turn into sprawling housing like Didcot.</p> <p>The local area infrastructure is already at risk from flooding, The additional demands for water and sewerage as well as rain water run off onto the A4 will cause significant detriment to the local area.</p> <p>The Council's support of this development is expedient and ill considered from lack of sufficient consideration of health care provision in line with current guidance from Public Health England. The current level of resources are already over stretched in terms of GP provision and Dentistry and the council and developers have demonstrated insufficient engagement with the integrated health bodies to reassure a genuine concern for the wellbeing of the additional new residents. The proposals in relation to education and school places are also inconsistent and vague and the developers suggested solutions to education requirements are platitudes to ensure approval.</p> <p>Please listen to local residents and reject this development which is over scales, poorly planned and detrimental to those in the surrounding areas.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Hubbard, Alison</p>

Consultee Full Name	Alison Hubbard
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS260
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 14:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	I object to the Thatcham NE development on the grounds stated: The components of the plan are unsound. The inevitable increase in traffic through Upper Bucklebury and Chapel Row has the potential for serious accidents. some without pavements - used by pedestrians and cyclists, including children, and increased traffic is totally unaccept
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tate, John
Consultee Full Name	John Tate
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS268
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 16:30:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposed plan to build 1500-2500 Houses in NE Thatcham as I find the plan unsound and impact on me.</p> <p>The proposed development of 1500-2500 Houses will have a significant health impact and should include a fit for purpose Health Impact Assessment (HIA) in accordance with the guidance from Public Health England. There has been no discussion with health services or on primary health care providers. There are insufficient GPs within the practices supporting Thatcham today, NHS Berkshire Group (CCG) confirms that Thatcham is in an area with the worst shortage of doctors in the country, with doctors ap... arrange let alone adding another 1500-2500 families. The plan offers no new GP practice, and it is unlikely that NHS practice. The additional homes will stretch the few facilities we have in Thatcham impacting me, my family and fellow... of WBC or the developers having arranged or conducted a relevant HIA or demonstrated any liaison with local health... GP practice facility will not solve the problem on its own - there needs to be funding for sufficient GPs to support the a... proposed development which does not seem to be addressed or catered for within the plan.</p> <p>It's not just doctors there is a significant lack of dentists in Thatcham, so much so I have had to register as an NHS p... - the proposed development will add increased pressure on already over-stretched dental practices.</p> <p>The Development provides no details of support for Nursery / Early Years, Primary or Secondary education. The plan... numbers and the likely impact on existing schools at Nursery / Early Years, Primary or Secondary and the Local Plan... define the provision of education and WBC has a duty to make suitable and effective school provision. Additionally its... classrooms/schools (the plan is unclear) there is the need to fund the teachers and staff to provide the necessary ec... payment but a sustained financial pressure that will be placed on WBC.</p>

	<p>The objective of WBC and NE Thatcham Development Consortium is to provide sports fields has not been met and there is no suitable location. The topography of the proposed development is a south facing slope, providing natural drainage for the site and therefore there is no suitable area in which to locate sports fields within the proposed development and there is no suitable area in Thatcham.</p> <p>The development will increase traffic and pollution in NE Thatcham, the Thatcham rail crossing, a known choke point with traffic likely to back up to the A4, a main road between Newbury, Thatcham and Reading. This development will increase traffic through the neighbouring villages.</p> <p>The proposed development takes up valuable green space on the edge of Thatcham, removing the opportunity to extend the green space in Thatcham. The proposed development removes significant green space, hedgerows habitat for birds and wildlife (back garden) and light pollution for the woods which the new development will border.</p> <p>There has been significant investment in flood prevention in NE Thatcham, including at Harts Hill - the proposed development will result in no natural drainage through the proposed development increasing the likelihood of flooding. There is a risk of water from the fields near Harts Hill onto the road, which will increase as a result of the proposed development.</p> <p>It is for these reasons, outlined above that I am objecting to the proposed development of 1500-2500 homes in NE Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pembroke, Marilyn
<p>Consultee Full Name</p>	Mrs Marilyn Pembroke
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS321

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing to object to the above plan as I feel it is unsound. My husband and I have lived in Chapel Row since the beginning of 1979 (nearly 44 years). In that time we have raised our children, made friends and acquaintances and become very much part of village life. We have been extremely happy here and plan to spend the rest of our lives here.

	<p>Over the past five years or so, traffic in the village has seen a big increase, especially when there are problems on the village roads do not have paths and street lighting. Drivers do not always take notice of the speed limits through the common. With the proposed plan to build at least a further 1500 houses in the North East of Thatcham, we foresee a plans for possible speed restrictions or calming measures proposed. We can see the potential for serious accidents</p> <p>We use the footpaths and byways on Bucklebury Common regularly for walking and exercising the family dogs, (especially) However, over the last few years this has become increasingly spoiled by people driving their quad bikes, motorbikes not intended for this purpose. Also fly tipping is on the increase. Allowing more people access will undoubtedly result a significant impact on walking, cycling, horse-riding. It will also impact on the wildlife in the area.</p> <p>The plan will have a big impact on education in the area, especially secondary education, and NHS doctors, and dentists There appears to be no serious attempt to investigate and address the consequences of building such a large number of brownfield sites around that would be more suitable and less impactful.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Cook, Brian
<p>Consultee Full Name</p>	Mr Brian Cook
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS326
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail</p>	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	27/02/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would like to object to the plan to build new houses in North East Thatcham under the Regulation 19 consultation process.</p> <p>My objection focuses on the negative impact that this development would have on me personally, the locality, the environment and the economy. I am also concerned that there are components of the plan that are unsound.</p> <p>I have grouped my objects in themes:</p> <p>The Environment</p> <p>I have 3 main areas of concern:</p> <ol style="list-style-type: none"> 1 The damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands and heaths, in

- 2 Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB the open countryside by local communities.
- 3 Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient mitigation will be taken after development e.g., through the vague promise of a 'community park'.

Taken together, and after a review of the background documentation provided by WBC in support of the draft LPR, I have no evidence to support claims that SP17 will have a positive impact on the environment. In fact, there is every reason to expect a negative impact. For example, the WBC states in the LPR that a Sustainability Charter is required to establish how 'positive' impacts (including the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability) will be 'informed by' various strategy documents (including one on ecology). Yet, the strategy documents either were not made available for the Regulation 19 consultation.

With an estimate that at least 4,000 people will be concentrated in the development site and will need access to green space for their wellbeing, I do not believe that the claimed provisions for green space will satisfy this demand on site. The original Thatcham proposal for two 'country parks' spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming to provide biodiversity enhancement over its current land use. No details were provided about how they would be formed and the information about the preparation of the parks, how they will be managed and funded to deliver that stated biodiversity enhancement looks as though the country parks have been downgraded to an undefined category of 'community parks' which only WBC has given to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be a negative impact on adjacent areas. The LPR also states its intent for SP17 to drive additional traffic (people and cars) into the AONB. 'It is intended that a network which will 'take advantage of the landscape' to 'facilitate connection to the AONB and include leisure routes across the landscape'. The management vision for Bucklebury Common is explicitly focused on **not increasing** human pressure on the fragile landscape to restore and nurture.

In fact, the LPR's own Sustainability Appraisal accepts that SP17 will have a **negative** impact on environmental sustainability and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated by whatever whatsoever on any such mitigation plans. This is not acceptable. However, the very same Sustainability Appraisal suggests that the development is likely to have an overall positive impact on sustainability – largely by absurdly ignoring the environmental consequences and the benefits that are highly questionable. The overall thrust of the SP17 policy is clearly to build as many houses as possible while making empty promises about how the environment – human and natural – will be improved or, if not, mitigated. The consultants to prepare the housing plans and justify the 'growth' requirement, there is no evidence of any serious attempt to systematically address the consequences. Do you want me to assume that everything will be all right because your consultants say that it will be? I am afraid I cannot do that.

Transport

There is no doubt that building so many houses will increase the amount of traffic using the roads, especially in the surrounding area.

The immediate links into Floral Way and Harts Hill means that the construction traffic from, or to, the site will adversely affect Chapel Row. Two very small villages and Cold Ash, which is already busy with traffic at peak times of the day. In all these areas, the roads are inadequate even with current traffic flow; they do not have pavements and therefore have the potential for serious deterioration. In the terrible condition of the roads, the increased noise and pollution, it will be disastrous for the villages and the people living there. The conclusion can also be applied to the increase in traffic once the development has been built. Research has shown that for every 1.24 cars. With an estimate that at least 4,000 people living on this site, this is a considerable increase in traffic is a significant increase.

The Sustainability Appraisal and Strategic Environmental Assessment which accompanies the Local Plan consultation for Thatcham East Thatcham against key Sustainability Objectives. Objective 4 aims to promote and maximise opportunities for all forms of transport. The Council Assessment concluded that the policy is likely to have a positive impact on road safety as 'safe and secure' of the site. Where is the evidence of this? How can an increase in all forms of traffic, walking and cycling journeys co-exist with a sustainable traffic environment?

The Transport Assessment says in paragraph 3.26 : 'The access arrangements for the northern end of the NET site (with right turn lanes where appropriate) on both Floral Way and Harts Hill Road. Results from the modelling suggest that the current situation is inadequate. However, the document shows no modelling results for this. There are drawings for all the other proposed junctions but no drawings for this. Why is this not available? I also understand that there are drawings showing a new car park on Harts Hill. This will be a significant part of what is already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the area.'

Education

West Berkshire Council, as an education authority, has a duty to plan for suitable school provision. How this obligation is met over the next 10 years is not defined or evidenced in the LPR.

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined in the LPR. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for all children. The Plan for a large new housing development is untenable. The lack of a coherent Plan on Schools Provision across the area also means that it is impossible to estimate the subsequent impact on traffic. The siting of a secondary school to the south of the site, a significant increase in traffic across the whole Thatcham area and are not considered in the traffic plans and modelled in the School Provision.

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 NE Thatcham States that 'the site will provide Early Years provision'. The provision for Primary school education is unclear and contradictory on the planned numbers of schools or Form Entry requirements. The LPR proposes that the sum of £12 million be contributed to primary education. However, with no recent data available (the only data referenced is from 2011), it is impossible to determine if this does not state the timing of this funding or school place provision. Clearly, schools need to be available before houses are built.

The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs or Kennet schools. Both are in the catchment area for both. Where schools are oversubscribed those children who live nearer to the school are prioritised. That children from the proposed NE Thatcham development would be able to opt for Kennet and those from Bucklebury for The Downs. The LPR is inconsistent, incomplete and contradictory on the provision of secondary schooling in and around Thatcham. This is a contradiction to the supporting documentation. It proposes that the sum of £15 million be contributed by the developer. However, there are no details of the location of the land to be provided and hence no possibility of assessing its suitability.

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new secondary school, half-funded by developer contribution. Government guidelines are that Secondary Schools with less than 6FE are not sustainable. However, the Development Plan states that the NE Thatcham development (which proposed 2,500 houses), is not sufficient to justify a new secondary school. The provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The funding proposed is not sufficient on its own to fill a 6-8 FE secondary school.

Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities for the catchment area. It is not feasible for a new school to be smaller than 6FE. With an apparent 40% reduction in the housing allocation in the 2020 Development Plan, a secondary school simply cannot be sustainable in this location. Earlier, in this same Thatcham NE Development Plan, the education provision exercise was based on WBDC data on pupil yield from a study in 2011. Clearly, the use of 11-year olds as a proxy for secondary school demand and early years educational demand across the town and has not attempted to predict the long-term capacities of existing schools. The Development Plan states that 'this study has not engaged in a detailed demographic prediction and modelling exercise'. Policy SP17, states that land (but not the Secondary school itself) will be provided for the development.

In summary, the plan for secondary school provision is 'unsound'. There is no satisfactory evidence of the number of Form Entries, the location of a school is not clear. The number of Form Entries is not defined, and anything less than a 6FE school is not sustainable. The funding is not clear and there is no evidence that the proposed funding is sufficient to meet the Council's obligations.

Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- 1 Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the road, the most traffic and pollution.
- 2 There is no funding earmarked for these facilities.

I am not clear if the school playing fields would also be available as Sports Fields. If the school itself is not viable, the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public due to safeguarding and liability. WBC and the North-East Thatcham Development Consortium to provide sports fields has not been met as they have not provided a suitable location.

Healthcare

It appears that WBC and the developers have neither arranged a relevant HIA nor provided evidence of having approached care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and therefore unable to mitigate the burden that 1,500+ new houses will make on a local NHS struggling to cope.

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that it be referred to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is no detail or insight into strategic healthcare planning. Proposals for a major development that is likely to have a significant impact on the local health and wellbeing, size and location, should be accompanied by a fit for purpose Health Impact Assessment (HIA) in accordance with the requirements of the Health and Safety Executive and Health England. The HIA should include reference to how the proposals for development have been discussed with health and wellbeing partners and impacts on primary health care services. The development proposals should demonstrate how the conclusions of the HIA will be reflected in the design of the scheme because an unacceptable impact on the health and wellbeing of existing or new communities would be unacceptable.

It is of concern that neither WBC nor the developers appear to have arranged or published a prospective HIA specific to the Thatcham development. Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy 2021-2030 has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Integrated Care Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity to understand the care requirements associated with new development. It is of concern that there appears to have been **no direct engagement** with healthcare providers. Thatcham Development Consortium and local general practices. Few new GP practices are commissioned by NHS England in the area. There is to be patient demand for improved services. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an even worse shortage of GPs in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or West Berkshire in the foreseeable future.

GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable. It would make no financial sense to extend the range of services and primary healthcare professionals available on a single site. It would make no financial sense to extend the range of services and primary healthcare professionals available on a single site.

	<p>sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the ac and staffing costs and encumbrance working across two sites. There has been no approach by WBC or the developo discuss an appropriate site, floor-space, or location to which one or more practices could relocate. An enlarged prima might be better located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Th to the centre of the population. Local practices did not have input with the inadequate 450 sq. m floor size proposal v the SP17 Policy of December 2022, Appendix D. The proposed North-East Thatcham development site is covered b of Thatcham Medical Practice (west of Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Ro understanding is that all three practices are already overstretched. The two Thatcham doctors' surgeries run indepen combined lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. Newly registe developments tend to make a greater demand on GP services because there are more young children, a higher mater family support and there is initially a higher housing turnover. One permanent and repeated temporary pharmacy clo exacerbated pressure on primary care locally. Thatcham dental practices are unable to provide dental care for the w minority of patients needing to travel further afield for NHS and private dental care.</p> <p>Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentis doctor outside Thatcham). There is no evidence provided that either WBC or the developers have approached any lo potential impact of increased workload resulting from additional housing.</p> <p>Reviewing the scant healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Ass Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be establish process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report publ no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at health centre. The objective of WBC and the North-East Thatcham Development Consortium to improve access to th community infrastructure has not been met as they have not provided evidence for the provision of a viable primary</p> <p>Finally, On 6th December 2022, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) releas detailing that the housing numbers should now be an advisory starting point and not mandatory. The statement wen Inspectorate should no longer override sensible local decision making, which is sensitive to and reflects local constr</p> <p>The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March 2023. The Consultati that the standard method for calculating the housing requirement (as used by West Berkshire for the regulation 19 ve not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation N of an area when assessing how much housing can be accommodated. On the back of this announcement, several L plan making process whilst they await the outcome of the consultation on the basis that a lower housing requiremen than the one currently being planned for. I feel that the council should take the opportunity, as others have, to pause forward a revised plan in line with updated planning guidance when this comes in later in 2023.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Vaessen, Stuart
Consultee Full Name	Mr Stuart Vaessen
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS339
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 13:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

I object to this proposal as I find it unsound for the reasons detailed herein.

3.1.1 TRANSPORT

I live in Upper Bucklebury - with the proposal for the new development this will increase traffic through the village causing the wellbeing of the residence and local wildlife. The main road going from Upper Bucklebury to Chapel Row (Broad Lane) is the common land and consequently a lot of local wildlife are in danger from the current traffic, increasing the flow of traffic through the village making the increase in traffic a risk to pedestrians and children who have to attend the local school. Although there are two width restrictions either end of the village an increase in traffic will only make the roads between the two even more unsafe than currently due to the increase in traffic.

As it stands currently there are no footpaths or road crossings between the common land either side of Broad Lane, and the roads between the two are even more unsafe than currently due to the increase in traffic.

Whilst the development is taking place the amount of large plant & vehicles being delivered to and from the site will increase around the neighbouring villages and access roads with the roads also becoming covered in excess mud from the site.

The proposed plan for an exit at the north of the site onto Harts Hill Road (and only became apparent in Phase 2 Traffic Assessment 2021). WBC predicts 'some DISPLACEMENT of A4 traffic onto wider **RURAL** routes such as Upper Bucklebury ...'

I ALSO DRAW YOUR ATTENTION TO THE COUNCIL'S REFUSAL FOR AN ACCESS ROAD CONNECTING FIVE MILE CROSSING AND ST GABRIELS FARM at Cold Ash (near Thatcham) THAT HAS BEEN REFUSED BECAUSE IT WOULD HAVE AN 'ADVERSE IMPACT'. This argument applies in this case too and I object to the proposed plan and demand that this is equally applied to Upper Bucklebury.

3.1.2 Access and junctions

There is no modelling plan results (despite saying these will not cause a problem) for the new priority junctions for bus stops - this is unsound

3.1.3 Car Parks

A proposed new CAR PARK on Harts Hill would encourage even MORE traffic to this dangerous road (I refer you to the report on that stretch of the road in the recent cold spell - despite the council gritting the road it remained impassable for several days - this car park? How is anti social behaviour and night time 'racing' of cars through the common road going to be quelled? meeting site?

3.1.4 Safe and Sustainable Transport

More transport will increase the risk to residence wellbeing and add pollution to the area. How do the council possibly have a Positive impact on road safety and travel, walking, cycling and public transport when the impact on Upper Bucklebury is **OPPOSITE as cited above.**

3.2 Healthcare

The NE Thatcham Development plan proposes a Primary Healthcare facility which the likelihood of funding being approved for this be a guarantee and if so is the facility for residence of the proposed site only or for the surrounding villages. Currently a GP takes weeks, so if there is no healthcare facility the impact on local GP's and the waiting time for an appointment will be significant. any proposal for a dental surgery on the site as this will also have the same impact on local dental surgeries and be a significant impact.

3.3 Environmental Impact

Upper Bucklebury consists of ancient woodlands, heaths and an historic and beautiful common (Bucklebury Plateau) with habitat for important vegetation and animal life.

Placing a major green field development in the broader landscape setting of the North Wessex Downs AONB would cause a significant impact on wildlife known to be present on this site.

THERE IS NO EVIDENCE TO SUPPORT CLAIMS THAT SP17 WILL HAVE A POSITIVE IMPACT ON THE ENVIRONMENT. IT IS EVIDENT THAT IT WOULD HAVE A SIGNIFICANTLY NEGATIVE IMPACT.

Of note the strategy documents required for the Sustainability charter (if they exist) have not been made public for the region and this proposal is unsound.

The updated SP17 text makes note of two 'community parks' that were initially put forward as 'country parks'. This demonstrates a lack of commitment to protecting the natural environment and peoples' enjoyment thereof.

As SP17 does not provide proven plans for providing adequate green space within the development nor demonstrate how to protect and delicate biodiversity, there will inevitably be spill over of people visiting the common areas locally and causing wildlife damage which is in polar opposition to the management vision for Bucklebury Common which is explicitly focused on NOT increasing the number of ecosystems that they work hard to restore and nurture. **The LPRs sustainability Appraisal accepts that SP17 will have a significant impact on environmental sustainability. This would be irreparable thus is unsound and unacceptable.**

3.4 Education

There is no clear plan showing provision for education from nursery through to secondary education which renders the current conceived housing plan untenable.

	<p>The proposed development would have significant impact on secondary school provision for children in Upper Buckle only one school catchment (near Compton) with no provision of a paid for school bus which would prove prohibitive and not been considered in the plan.</p> <p>There is no evidence of the number of pupils a proposed new secondary school would have to cater for.</p> <p>The location of the school is not clear</p> <p>There is no clear plan of the funding nor that such funding is sufficient to meet the councils obligations to provide education.</p> <p>None of this is clearly defined nor evidenced in the LPR thus making it unsound.</p> <p>IN ADDITION</p> <p>The water and sewerage systems in this locality are often overwhelmed with Thames Water frequently having to attenuate even more worryingly currently having to pump effluent into the local river nearby. Additional housing (and certainly the associated infrastructure) in such circumstances is simply not tenable.</p> <p>The Secretary of State for Levelling up, Housing and Communities issued a statement on 6th December 2022 stating that Local Plan Reviews are NOT mandatory and that THE PLANNING INSPECTORATE SHOULD NO LONGER OVERRIDE SENSIBLE LOCAL PLANNING WHICH IS SENSITIVE TO AND REFLECTS LOCAL CONTRAINTS AND CONCERNS.</p> <p>I urge WBC to do as other local councils have and PAUSE the planning process in order to bring forward a revised plan in line with the updated planning guidance.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mullis, Lisa
Consultee Full Name	Mrs Lisa Mullis
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS343

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 20:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to register my objection to the proposed new 'Thatcham NE Development' as I find it unsound. Transport <ul style="list-style-type: none"> Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a re through the villages. We sought assurances and were led to understand by WBC planners that traffic from the

Way and the A4. This is true but what they 'forgot' to mention was a plan for an exit at the north of the site onto the A4. This is apparent on Friday, 6th January when the Transport assessment was published: Phase_2_Transport_Assessment. **is serious for us because traffic from, or to, the site is only going to go in one direction from this exit – where it will split between the traffic going through Cold Ash and the traffic through Upper Bucklebury**

- I understand there are access arrangements for the northern end of the NET site proposes new priority junctions (where appropriate) on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause any significant impacts (document has no modelling results for this. There are drawings for all the other proposed junctions but none for the new junctions)
- There are drawings showing a new car park on Harts Hill. The purpose is a mystery but will surely add more traffic to an already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park

Healthcare

- The NE Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that it be referred to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. **bereft of detail or insight into strategic healthcare planning!**
- It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, appear to have undertaken any prospective HIA specific to the proposed North-East Thatcham development.
- Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Health Partnership. **I have a concern that there appears to have been no direct engagement between the North-East Thatcham Consortium and local general practices.**

Environment

I have a concern on three main areas:

- Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area, and its ancient woodlands and heathland. This is a Common.
- Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB that is valued for the open countryside by local communities.
- Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient measures will be taken after development e.g. through the vague promise of a 'community park'
- Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the plan, I concluded that there is no evidence to support claims that SP17 will have a positive impact on the environment. **reason to believe it will have a significantly negative impact.**
- I understand it has been estimated that at least 4,000 people will be concentrated in the development site. The plan does not provide green space for recreation and general wellbeing. We do not believe that the claimed provisions for green space are sufficient. The original Thatcham Growth Plan had a vague proposal for two 'country parks' spaced across the top of the site. The Biodiversity Opportunity Area, claiming the potential for significant biodiversity enhancement over its current land use
- In the updated SP17 text, the country parks have been downgraded to undefined 'community parks' which only offer a limited benefit. WBC has given to protecting the natural environment and public enjoyment of it.

Education

Information has been provided by WBC regarding education, however I find the plan for secondary school provision is inadequate.

- There is no satisfactory evidence of the number of pupils the school is to cater for;
- The location of a school(s) is not clear;
- The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- The timing of the funding is not clear; and
- There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education for all children in the area.

West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. Funding for secondary education across all school years is not defined or evidenced in the LPR.

Miscellaneous

The Regulation 18 Consultation stated that only 1250 dwellings would be built in the plan period, and this I understand is a maximum. The 15000 number is stated as both a minimum and an approximate number and supporting studies are still based on the assumption that this could increase to the original 2,500 when the plan is reviewed after 5 years or in the next plan period.

There is no evidence WBC has consulted properly with Thames Water over the time needed for provisions of water and sewerage for the proposed new dwellings.

The Secretary of State's Written Statement of 6Th December 2022, which removed the need to maintain a 5-year housing strategy, and the decision to update Local Plans, removed the top-down housing targets (particularly for Local Authorities with constraints like AONBs) and a transition period for LS's in final stages of preparing Local Plans and this statement should be taken into account by all Local Authorities.

In conclusion- because of the concerns I have raised, the Reg 19 PPR Submission in its entirety should be considered as inadequate.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brown, Graham
Consultee Full Name	Graham Brown
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS357
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 22:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>During the [personal information redacted] I have lived in Upper Bucklebury I have seen house numbers increase with services which support the area. The additional housing has already placed more pressure on the existing inadequate and utility service provision. However, that growth is insignificant compared to the proposed NE Thatcham development sufficiently thought through and is totally unsound.</p> <p>I strongly oppose the NE Thatcham development on the following grounds:</p> <p>1. Traffic:</p> <p>In the years that I have lived [personal information redacted] the traffic volumes have increased significantly. It travels at speed limit, along a stretch of road where there is no pavement or street lighting, making it unsafe for pedestrians and greatly increase the volume of traffic including along Harts Hill Road, which is a particularly unsafe and windy stretch with frequent accidents. Increased traffic volumes will pose yet further threat to the safety of pedestrians, cyclists and motorbikes. There has been no modelling for the proposed junction on Harts Hill Road presumably because any such junction would be inherently unsafe. It is quite strange to see a proposed car park on Harts Hill. I really don't understand why one would be needed and to perform a traffic assessment to work that out.</p> <p>The Council's assessment that the development will reduce accidents and improve safety as well as increase opportunities for public transport (which is pretty much non-existent in Upper Bucklebury) is totally ludicrous and without any basis or evidence. The opposite is likely to be true given the current problems with traffic volumes, which would be dramatically worsened.</p> <p>2. Healthcare:</p> <p>The NHS is in crisis and unable to provide adequate primary care to those already living in the area. The development will increase the need for health care and there is no coherent plan as to how and where the health care needs of those living on the proposed development will have their primary care needs met. In turn there will be increased pressures on hospital services which are similarly under pressure. The prospect of a new GP practice being established and no financially viable prospect of one of the existing GP practices closing. Dental practices will be similarly unable to provide for the needs of those on the development. There is no evidence that the development is considered with local health care agencies or providers.</p> <p>3. Environment:</p> <p>The site is a greenfield site and would therefore have an extremely detrimental impact on environmental sustainability. This negative impact on the environment will be managed and mitigated, if indeed that is remotely possible. There is no space on the development site. This development will simply increase traffic (people and vehicles) to Bucklebury Common, the fragile ecosystem of the Common requires. It presents a threat to legally protected wildlife on the site and in the area.</p> <p>4. Education:</p> <p>Education for the children that would live in the development does not appear to have been addressed. How does the development have an obligation to provide suitable education facilities for these children? The current schools in the area are mostly in a poor state of repair and facilities lacking. As a parent of school age children I am constantly being asked to provide transport to a local authority school system which is struggling with the lack of funding. I fail to see how creating further schools</p>

	<p>make a difference. It is clear that there isn't a proper plan for secondary school provision. The number of pupils to be financial viability of a school unlikely. There is no indication of where the school would be located or indeed when it v seems there isn't adequate funding.</p> <p>It is clear that there has been no consideration given to the infrastructure necessary to support such a development extremely detrimental impact that the development will have on the local environment and the lives of those living lo</p> <p>Please keep me updated on the status of this development proposal.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Williams, Tim & Nicki
Consultee Full Name	Tim & Nicki Williams
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS353
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 22:36:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>We believe that the Local Plan Review is being undertaken in an unsound and possibly illegal way and represents a poor use of council resources. One of us would be prepared to appear at any enquiry.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We are writing to express concerns about the Local Plan Review. We believe that the Local Plan Review is being undertaken in an illegal way and represents a poor use of council resources. One of us would be prepared to appear at any enquiry.</p> <p>The proposed submission (Reg 19) local plan review document is the outcome of an unsound process of consultation in 2020 before the revisions to the protected zones around Burghfield and Aldermaston. The proposal to site 2500 houses (1500 houses) appeared after the previous round of consultations closed. It is therefore an unsound submission and does not comply with section 110 of the Localism Act.</p> <p>The document presents a new build of 1500 houses throughout as though that were an upper limit. We would suggest that the words at least 1500 houses. The aim of the North East Thatcham development is for 2500 houses as revealed by the words at least 1500 houses. The need for this number of houses is based on outdated guidance from Central government. Following Michael Gove's level of housing need is described as advisory and not a requirement.</p> <p>Inappropriate consultation process</p> <p>All public bodies have a duty to make public consultations available to all interested parties. This includes making reasonable adjustments for parties who may have problems with complex language or reading. Implicitly the consultation should not be restricted to online only. Restricting the consultation to online only means that those parties who do not use the internet or have disabilities relating to language are excluded. It is our view that the online only form of the consultation (the proposals have not been subject to any form of public consultation) has excluded poorer and less able members of the community. The council could have protected themselves against these points by making easy to read versions of the documents available on request.</p> <p>Inadequate evidence</p> <p>1. Water</p> <p>We have not found evidence that the council has considered the water run off issues identified in several objections submitted to the council and Natural England. In this connection We note that it is not the council that is ensuring the water supply capacity. Instead it is the water companies.</p>

Instead the statement refers to the “developers are aware of requirement for upgrades to the water supply network a case of other developments in the District the water supply and water treatment were required before the developme

2. Transport
The transport modelling is incomplete. There is no evidence that can be examined on the traffic flows due to the exis
Harts Hill Road and Floral Way. We also note that the estimated additional delays on the A4 and Floral Way of an ex
contribute to degradation in air quality along these roads.
There is no evidence to suggest that this development is sustainable in terms of a detailed public transport plan. The p
far from Thatcham Station and will promote car travel along the A4 corridor in particular.
There will also be an increased traffic density on the roads around Bucklebury which will endanger the lives of cyclist
and traffic cannot manoeuvre easily around cyclists or indeed horse riders. Most of the roads have no pavements an
danger to pedestrians.
In connection with the Highways Assessment there is no mention of a railway bridge to replace the level crossing at
believe that the Phase 1 Transport Assessment has considered the effects on queues at that point in Thatcham. We
Assessment is itself unsound. Our view is supported by the fact that the 2023 West Berkshire Infrastructure delivery pl
Level Crossing at all.
West Berkshire Council has already shown that it is unable to plan for alternatives to the use of motorized transport.
Berkshire Council along the A4 are unpleasant to use and regularly intersected by vehicle access points. This repres
3. Facilities including public services
Paragraph 7.47 of the local plan review requires that residential developments should be located “where there is alre
and facilities”. The area being considered for housing is at the outer edges of Thatcham and is further from existing
current roads are already over crowded and in parts smaller than current standards.
The local plan review identifies sports fields as being part of the development. HoWever sports fields requires level grou
for development is undulating and it is difficult to see where sports fields could be placed. No funding has been identi
fields which would require considerable landscaping (removing hills and filling valleys).
4. Natural Environment
The environmental assessment is lacking in the level of detail that would allow it to be considered fully. On this basis th
for consultation.
We have not been able to identify any mitigation measures for the rural character of public rights of way or for the bi
Common.
The consultation document identifies the « Thames Valley Environmental Research Centre” as providing an initial as
that We can identify. There is a Thames Valley Environmental Record Centre which exists to “share knowledge”. It is
environmental assessment for the purpose of large scale development unless some other body has already done th
piece of evidence which suggests that the plan is unsound.
Much of the development covers areas that are identified as biodiversity opportunity areas.
5. Health Infrastructure
The current GP practices are not involved in the consultation nor are the Health Planning Authorities. Although the re
that there were significant health issues that needed to be addressed the issues are not addressed in the regulation
All three local practices are already restricting access by patients in order to cope with the demand from the existing
not workable with existing resources.
The failure of the local authority to take account of the health needs of additional population indicates that the plan is
6. Education
The plan does not identify provision for early years education.
The information on primary schools is unclear.
The ability of the secondary schools in the area to cope with the demand is already stretched to breaking. The propose
considerable central government support and the nature of the phase 1 development is such that it is unlikely to attr
The size of the development is too small to attract support from central government. For the building of a new school
is therefore unsound.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hutton, Olivia
Consultee Full Name	Olivia Hutton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS309
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 11:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>WBC LPR Regulation 19 Objection</p> <p>I am writing to object to the proposed development to the proposal to build 1500-2500 Houses in NE Thatcham because it will have a negative impact on Upper Bucklebury and the surrounding area.</p> <p>1. Transport</p> <p>I am concerned about the extra traffic this will generate through Upper Bucklebury and the additional congestion on the road. I understand that despite assurances that this will have a 'positive impact on road safety' I understand that there is a risk of the site onto Harts Hill. This is of great concern because traffic to and from the site is only going to go in one direction through Bucklebury. In addition WBC predicts 'some displacement of A4 traffic into wider rural routes such as Upper Bucklebury and Upper Bucklebury are narrow and already busy and it is my genuine concern that extra traffic will result in a serious increase in traffic on Upper Bucklebury to Chapel Row is a long straight road which allows people to drive legally up to 60 miles per hour, making it dangerous to cross at the junction of Carbinswood Lane and Pease Hill.</p> <p>2. Healthcare</p> <p>The proposed development will put enormous strain on our existing GP practices. There appears to have been no discussion with the North East Thatcham Development Consortium and general practices. In the present climate of GP shortages and the fact that GP practices are commissioned by NHS England, and I think it is fair to say there is therefore no realistic prospect of a new GP practice in Thatcham or West Berkshire in the foreseeable future. As far as I am aware, there has been no approach by WBC to a GP practice to discuss opening a new practice. The existing practices are already overstretched and I fear that the arrival of new patients will make a huge demand on our already stretched local GP services.</p> <p>Environment</p> <p>I understand that approximately 4000 people will be living on the development site. These people will need access to green space since SP17 has no proven plans for providing adequate green space and protecting biodiversity which will inevitably impact on the adjacent green areas. You are no doubt aware that management of Bucklebury Common is explicitly focused on not disturbing the fragile ecosystems. In addition, despite the Sustainability Appraisal accepting that SP17 will have a negative impact on the environment there is no detail whatsoever of any mitigation measures.</p> <p>In light of the above I feel that the council should take the opportunity to stop this planned development as it is both a significant and negative impact on the local area. I am prepared to appear at the public enquiry if invited.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kennedy, Linda
Consultee Full Name	Linda Kennedy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS506
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	28/02/2023 10:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to raise my concerns and ultimate objection to the proposed housing development of 1500+ houses in M consideration, whilst I do not disagree that new homes are needed, I do feel strongly that the proposals as they stand Chapel Row for the past 26 years and prior to that as resident in Thatcham for 11 years, I have watched the town an</p> <p>The roads have become so much busier, and in Chapel Row, I already note too many motorists speeding and many there people are often walking on the roads, perhaps with young children and dogs etc. The new plans not only on Hill Road. The additional traffic being pushed through Upper Bucklebury and along The Avenue will be significant an an unacceptable impact on The Common. It is already apparent that the roads are not geared to increased traffic as on the A4 and traffic diverts. There is no street lighting and it is already a challenge and dangerous when larger vehi have also noted that a car park is planned on Harts Hill - why? Does the development not have enough parking for t in previous developments that parking for each house, driveways and garages has been limited, a naive belief that if p have cars perhaps? Drive round the streets now - they are littered with cars. What is the purpose of this proposed ca can't park? I am concerned that it may become a meeting point and another location to encourage anti-social behav occurs in some locations on the Common.</p> <p>We really must, collectively, protect our local environment and that means very, very carefully looking at various opti must consider the true impact of the development on the local ecology. Is there a publically accessible document on development? I have not been able to find one. A proper assessment of the additional hosuing, and potential additi be properly assessed to protect what we have for all over many many more years.</p> <p>I recall being able to get a Drs appointment at my local surgery, both in Thatcham and Chapel Row, in a reasonable ti houses have been built in the surrounding areas it became difficult for people to register with their nearest GP so the new patients. People should be able to register with a GP without great difficulty and be able to access appointments timeframe, but unfortunately the latter is no longer the case. This new development is only going to make this worse, new GP surgery is not going to happen any time soon and I have been unable to see a HIA specifically associated v therefore have no confidence in any statements advising me that 'all will be well'.</p> <p>In conclusion, I feel compelled to object to this development, I feel the plans are unsound and more consideration is to local concerns. Pause and think carefully - is this not the right thing to do in light of new planning guidance that is</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cook, Gillian
Consultee Full Name	Mr Gillian Cook
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS323
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
 * Yes
 * No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

I would like to object to the plan to build new houses in North East Thatcham under the Regulation 19 consultation process.

My objection focuses on the negative impact that this development would have on me personally, the locality, the environment and the wider community. I am also concerned that there are components of the plan that are unsound.

I have grouped my objects in themes:

The Environment

I have 3 main areas of concern:

- 1 The damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands and heaths, in particular the open countryside by local communities.
- 2 Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB and its surrounding countryside.
- 3 Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient measures will be taken after development e.g., through the vague promise of a 'community park'.

Taken together, and after a review of the background documentation provided by WBC in support of the draft LPR, I have no evidence to support claims that SP17 will have a positive impact on the environment. In fact, there is every reason to believe that it will have a negative impact. For example, the WBC states in the LPR that a Sustainability Charter is required to establish how 'positive impacts' will be achieved (including the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability). The Charter 'will be informed by' various strategy documents (including one on ecology). Yet, the strategy documents either do not exist or are not made available for the Regulation 19 consultation.

With an estimate that at least 4,000 people will be concentrated in the development site and will need access to green space for their wellbeing, I do not believe that the claimed provisions for green space will satisfy this demand on site. The original Thatcham proposal for two 'country parks' spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming to provide biodiversity enhancement over its current land use. No details were provided about how they would be formed and the information about the preparation of the parks, how they will be managed and funded to deliver that stated biodiversity enhancement looks as though the country parks have been downgraded to an undefined category of 'community parks' which only provides a veneer of WBC's commitment to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be a negative impact on adjacent areas. The LPR also states its intent for SP17 to drive additional traffic (people and cars) into the AONB. 'It is intended that a new network which will 'take advantage of the landscape' to 'facilitate connection to the AONB and include leisure routes across the landscape'. The management vision for Bucklebury Common is explicitly focused on **not increasing** human pressure on the fragile landscape to restore and nurture.

In fact, the LPR's own Sustainability Appraisal accepts that SP17 will have a **negative** impact on environmental sustainability on the site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated by whatever whatsoever on any such mitigation plans. This is not acceptable. However, the very same Sustainability Appraisal suggests that SP17 is likely to have an overall positive impact on sustainability – largely by absurdly ignoring the environmental consequences and the benefits that are highly questionable. The overall thrust of the SP17 policy is clearly to build as many houses as possible while making empty promises about how the environment – human and natural – will be improved or, if not, mitigated. It asks consultants to prepare the housing plans and justify the 'growth' requirement, there is no evidence of any serious attempt to systematically address the consequences. Do you want me to assume that everything will be all right because your consultants say that it will be? I am afraid I cannot do that.

Transport

There is no doubt that building so many houses will increase the amount of traffic using the roads, especially in the surrounding area.

The immediate links into Floral Way and Harts Hill means that the construction traffic from, or to, the site will adversely affect Chapel Row. Two very small villages and Cold Ash, which is already busy with traffic at peak times of the day. In all these areas, the roads are inadequate even with current traffic flow; they do not have pavements and therefore have the potential for serious safety issues.

terrible condition of the roads, the increased noise and pollution, it will be disastrous for the villages and the people. The conclusion can also be applied to the increase in traffic once the development has been built. Research has shown that 1.24 cars. With an estimate that at least 4,000 people living on this site, this is a considerable increase in traffic is a

The Sustainability Appraisal and Strategic Environmental Assessment which accompanies the Local Plan consultation for East Thatcham against key Sustainability Objectives. Objective 4 aims to promote and maximise opportunities for all transport. The Council Assessment concluded that the policy is likely to have a positive impact on road safety as 'safe' of the site. Where is the evidence of this? How can an increase in all forms of traffic, walking and cycling journeys co-exist in a sustainable traffic environment?

The Transport Assessment says in paragraph 3.26 : 'The access arrangements for the northern end of the NET site (with right turn lanes where appropriate) on both Floral Way and Harts Hill Road. Results from the modelling suggest that However, the document shows no modelling results for this. There are drawings for all the other proposed junctions but Why is this not available? I also understand that there are drawings showing a new car park on Harts Hill. This will be part of what is already a dangerous road and may also promote the night-time antisocial behaviour all too apparent

Education

West Berkshire Council, as an education authority, has a duty to plan for suitable school provision. How this obligation over 10 years is not defined or evidenced in the LPR.

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Plan. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for the Plan for a large new housing development is untenable. The lack of a coherent Plan on Schools Provision across the town also means that it is impossible to estimate the subsequent impact on traffic. The siting of a secondary school to the north of the site is a significant increase in traffic across the whole Thatcham area and are not considered in the traffic plans and model for School Provision.

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 NE Thatcham Strategic Planning states that 'the site will provide Early Years provision'. The provision for Primary school education is unclear and contradictory on the planned numbers of schools or Form Entry requirements. The LPR proposes that the sum of £12 million be contributed to primary education. However, with no recent data available (the only data referenced is from 2011), it is impossible to verify. It does not state the timing of this funding or school place provision. Clearly, schools need to be available before housing

The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs or Kennet are in the catchment area for both. Where schools are oversubscribed those children who live nearer to the school are prioritised that children from the proposed NE Thatcham development would be able to opt for Kennet and those from Bucklebury would go to Downs. The LPR is inconsistent, incomplete and contradictory on the provision of secondary schooling in and around the town a contradiction to the supporting documentation. It proposes that the sum of £15 million be contributed by the developer but there are no details of the location of the land to be provided and hence no possibility of assessing its suitability.

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new secondary school, half-funded by developer contribution. Government guidelines are that Secondary Schools with less than 6FE. However, the Development Plan states that the NE Thatcham development (which proposed 2,500 houses), is not sufficient. The provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town and the proposed is not sufficient on its own to fill a 6-8 FE secondary school.

Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities for the town. It is not feasible for a new school to be smaller than 6FE. With an apparent 40% reduction in the housing allocation in the 2020 Plan, 200 houses, a secondary school simply cannot be sustainable in this location. Earlier, in this same Thatcham NE Development Plan, the education provision exercise was based on WBDC data on pupil yield from a study in 2011. Clearly, the use of 11-year-olds. The Development Plan states that 'this study has not engaged in a detailed demographic prediction and modelling exercise for 11- and early years educational demand across the town and has not attempted to predict the long-term capacities of existing schools to 2039, Policy SP17, states that land (but not the Secondary school itself) will be provided for the development.

In summary, the plan for secondary school provision is 'unsound'. There is no satisfactory evidence of the number of Form Entries. The location of a school is not clear. The number of Form Entries is not defined, and anything less than a 6FE school. The funding is not clear and there is no evidence that the proposed funding is sufficient to meet the Council's obligations.

Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- 1 Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the town, the most traffic and pollution.
- 2 There is no funding earmarked for these facilities.

I am not clear if the school playing fields would also be available as Sports Fields. If the school itself is not viable, the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public due to safeguarding and liability. WBC and the North-East Thatcham Development Consortium to provide sports fields has not been met as they have not identified a suitable location.

Healthcare

It appears that WBC and the developers have neither arranged a relevant HIA nor provided evidence of having approached care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and therefore mitigate the burden that 1,500+ new houses will make on a local NHS struggling to cope.

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is no detail or insight into strategic healthcare planning. Proposals for a major development that is likely to have a significant size and location, should be accompanied by a fit for purpose Health Impact Assessment (HIA) in accordance with the guidance from Health England. The HIA should include reference to how the proposals for development have been discussed with healthcare providers and the impacts on primary health care services. The development proposals should demonstrate how the conclusions of the HIA will inform the design of the scheme because an unacceptable impact on the health and wellbeing of existing or new communities would be unacceptable.

It is of concern that neither WBC nor the developers appear to have arranged or published a prospective HIA specific to the Thatcham development. Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy 2021-2030 has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Integrated Care Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity to understand care requirements associated with new development. It is of concern that there appears to have been **no direct engagement** with the Thatcham Development Consortium and local general practices. Few new GP practices are commissioned by NHS England and there is therefore no realistic prospect of patient demand for improved services. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an even worse shortage of GPs in other areas of the country. There is therefore no realistic prospect of a new practice established in Thatcham or West Berkshire in the foreseeable future.

GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable and to extend the range of services and primary healthcare professionals available on a single site. It would make no financial sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional staffing costs and encumbrance working across two sites. There has been no approach by WBC or the developers to discuss an appropriate site, floor-space, or location to which one or more practices could relocate. An enlarged primary care site might be better located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham site is to the centre of the population. Local practices did not have input with the inadequate 450 sq. m floor size proposal within the SP17 Policy of December 2022, Appendix D. The proposed North-East Thatcham development site is covered by the existing Thatcham Medical Practice (west of Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row Surgery. The understanding is that all three practices are already overstretched. The two Thatcham doctors' surgeries run independent lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. Newly registered patients tend to make a greater demand on GP services because there are more young children, a higher proportion of patients with family support and there is initially a higher housing turnover. One permanent and repeated temporary pharmacy closure has exacerbated pressure on primary care locally. Thatcham dental practices are unable to provide dental care for the small minority of patients needing to travel further afield for NHS and private dental care.

Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentist (the remainder at a dentist outside Thatcham). There is no evidence provided that either WBC or the developers have approached any local dentist to assess the potential impact of increased workload resulting from additional housing.

Reviewing the scant healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates, 2016), Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established as part of the process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in 2016 provides no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at capacity and a new health centre. The objective of WBC and the North-East Thatcham Development Consortium to improve access to the community infrastructure has not been met as they have not provided evidence for the provision of a viable primary care site.

Finally, On 6th December 2022, Michael Gove (Secretary of State for Levelling Up, Housing and Communities) released a statement detailing that the housing numbers should now be an advisory starting point and not mandatory. The statement went on to state that the Inspectorate should no longer override sensible local decision making, which is sensitive to and reflects local constraints.

The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March 2023. The Consultation states that the standard method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the Local Plan) is not mandatory and should only be the starting point for local plan. There is a particular focus within the consultation on the need to pause the Local Plan making process in an area when assessing how much housing can be accommodated. On the back of this announcement, several Local Plan making processes have paused whilst they await the outcome of the consultation on the basis that a lower housing requirement is likely than the one currently being planned for. I feel that the council should take the opportunity, as others have, to pause the Local Plan making process forward a revised plan in line with updated planning guidance when this comes in later in 2023.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Billing, Moira
Consultee Full Name	Moira Billing
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS391
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 11:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	<p>The online form is difficult to follow with many links that make it difficult to understand the structure of the document terms of legal compliance, under the letter of the law I am not qualified to judge, even asking this question of West B and any response there were supplied would not be valid evidence because most residents including myself are not have the necessary knowledge or skills to decide.</p> <p>In terms of the spirit of the law I believe the consultation is not compliant. Carrying out a consultation implies access to an expert(s) and the consultees to enable the latter to make an informed decision. The information supplied should be understandable by the consultees and not in technical jargon.</p> <p>This consultation fails in several areas:</p> <ul style="list-style-type: none"> A huge amount of information has been provided, but is difficult to interpret and to make overall sense of. It's not clear the structure of the consultation and when the council form is accessed is suddenly refers to lots of other documents which I do not do. They will probably give and not submit a response. There is too much complicated information

	<ul style="list-style-type: none"> • Mainly available online – no access for people who are computer illiterate or do not have suitable hardware to access the documents. If people work they cannot access the documents in the council offices if they work full time, they cannot fully understand all the documents. • The policy map is illegible on a standard computer screen. It is far too small to be of use and the legend included is difficult to understand and couldn't readily find out what it means. • Many residents do not even know that this consultation is taking place. Emails were sent out to people on the council without electronic devices would not be notified. It has been in the local paper but not everyone reads that either. It is circulated by a number of dedicated people who have leafleted houses in their area. • This is an important plan setting policy for the next 15 years and I believe that a genuine consultation process should involve the provision of a summary leaflet to every property in the district setting out the basic details of the plan that the public was consulted on. There should also have been a public exhibition put on during the full length of the consultation period in several locations to give the public an opportunity to view the details. Staffed by council officers it would have allowed questions and concerns to be raised and answered to be provided to the council. The provision of large scale map would be a critical part of the exhibition so the effort put in to the plan is established, rather than just each individual proposal. <p>The council may be complying with legal requirements but it clearly doesn't care a bit about genuinely consulting with the public.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Once again, the question is written for experts to complete and expecting resident to read and understand the National Planning Policy Framework as well as the local plan, is unrealistic so I can't say that the plan is sound because I don't know.</p> <p>From information from Michael Gove MP in his role as Secretary of State for Levelling Up, Housing and Communities it is clear that the plan is not sound. He has indicated his preference for Brownfield sites, which is not presently the case, and he has delayed some of the matters that will affect the preparation of Local Plans. If that is so then the West Berks Plan does not conform to that policy. The matters that have been suggested by developers are noticeably absent from this plan. In particular the redevelopment of the Faraday Colthrop industrial area which included a major infrastructure improvement, a bridge over the railway and rivers in Thatcham to solve traffic issues of the level crossing.</p> <p>Many local authorities have delayed their local plan preparation until this information has been released, surely this is the case in Berkshire because of the potential impact on the lives of all West Berkshire residents.</p> <p>As a resident of Thatcham I have particular concerns about this policy</p>

	<ul style="list-style-type: none"> • This is a proposed greenfield site development. I believe the government is favouring brownfield sites. Why has not been included – surely this meets the requirements of the plan, especially when it includes a proposal for a to remove the Thatcham level crossing and its associated traffic issues. • Thatcham cannot cope with any more housing without major infrastructure improvements, which I cannot find. Public transport is poor. There is little parking at the railway station and no improvements indicated. People take 20 minutes to come back into Thatcham from Woolhampton at 5.30pm, it can only get worse. • From previous experience, proposals for consultation are never reflected in subsequent planning applications v oppose them as happened with the proposed development to the east of Floral Way at the A4 junction. Access infrastructure improvements didn't materialise and it would have negatively affected nearby properties. What is the Thatcham NE development • Areas of semi-ancient woodland are at risk from the development of the site. The green break between Thatcham virtually removed. • What is the point of proposing green spaces when the development is just taking away green spaces and public • The present road infrastructure is poorly maintained and not being repaired by the Council – how will it cope with traffic? • There is no proposal for a second secondary school, I understand that Kennet School is at capacity • What provision has been made for new employment opportunities in the area which could reduce the need for parking in Newbury have been converted to housing which could have been short sited – home working may not last for • How was the decision made to include Thatcham NE in the plan when it doesn't appear to meet planning requirements excluded which probably did. It will have a detrimental effect on the environment and the general well-being of <p>In summary I feel that this process does not provide a suitable consultation process to the residents of West Berkshire decisions regarding the Local Plan Review. The process should be delayed to wait for further guidance from the Government consultation to be carried out.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Adams, Paul
Consultee Full Name	Paul Adams
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS316

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I have tried to register my objection via the online portal but I'm afraid that I found it too confusing. I strongly object to the proposed plan to expand to the north east of Thatcham for the following reasons. I am willing required. 1 Transport

The area around the east & north of Thatcham is already very often heavy with traffic & traffic jams, (causing pollution & traffic).

I believe that the "Traffic Survey" carried out for the plan was done during the Covid Lockdown & is therefore unsound & corrupt!

Adding more houses to the area would increase the traffic & pollution, with increased volume & danger along Harts Road.

1 Access & Junctions

The transport assessment proposes new "priority junctions" but gives no details of where, how many, or how these would be created. Modelling results at all, even though, again these would have been created during the Covid pandemic.

1 Car Parks

I do not understand the need for car parks, unless it is to provide a location for anti social behaviour of an evening. The plan surely acknowledges an increase in car use?

1 Safe & sustainable Transport

The plan will increase the use of private vehicles on already crowded small roads. This will have a detrimental effect on the area, dangerous to walk or cycle in & around the area.

5 Healthcare

The population of Thatcham is already very high for the number of General Practice Doctors & especially dentists. There is no appointment at both. Putting more houses in the area without having completed a Health Impact Assessment does not seem to be no plans, (just words) for increasing the infrastructure to both GP surgeries & dentists. Thus increasing the problem in the area.

6 Environment

Most mornings I see some deer & muntjac, the occasional fox, kestrels, red kites & buzzards from my house. The plan will remove a couple of the trees which will be felled by this development. I have, in the past seen a snake, (not sure if was an adder) & a crested newt, in the proposed area. Also, most evenings during the warmer months, bats are flying around the area. If the development goes ahead as suggested. There are also a number of beehives at the rear of my property. If this plan goes ahead, they will no longer have anywhere to forage.

7 Water

At the moment Thames Water often end up releasing untreated waste water, (including raw sewage) into the River Kennet. This is due to the waste water treatment plant being overwhelmed with the amount of rain water being disposed of by the area. There are another 1500 - 2500 homes added to this & acres more tarmac & concrete, then it is obvious that the amount of water to be disposed of will increase & therefore Thames Water will have to release more & even more often.

The whole of this proposed development is a "green field" site & the impact on the environment will be devastating. There is no evidence (in words, no evidence) that it will have a positive impact on sustainability. Again, I would suggest, disingenuous, (possibly illegal) to suggest otherwise.

It appears that the main motivator for this development seems to be financial. Plans for a development on Siege Cross were approved of years ago, apparently due to "urbanisation" of the area & lack of infrastructure & yet this plan, (incorporating the same site) was approved without regard to the previous decision?

The "gap" between Newbury & Thatcham is already only one field / width of the A4 wide & by increasing the size of the development is being proposed, we are going to end up with another urban sprawl, similar to Slough. A massive conurbation in the area.

I also believe that there are some suitable "Brown Field" sites, such as Colthrop, which developers have suggested for a road bridge to assist with the level crossing. I have been told that this was turned down by the council as "Drivers would be waiting at the crossing". I do not understand this logic?

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

Yes

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mahoney, Ruth
Consultee Full Name	Ruth Mahoney
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS276
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 18:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I object to the plan to build 1500 extra houses and I find it unsound for the following reasons:</p> <p>The amount of extra traffic generated in Upper Bucklebury, already subjected to heavy through-traffic, would be unsu... is a plan for an exit at the north of the proposed site onto Harts Hill. This is an extremely dangerous road, narrow, b... cyclists and a no-go area for pedestrians, having no footpath - totally unsuitable for any additional traffic. The council... some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury would occur. Although a cyclist m... into Thatcham because of the danger on Harts Hill, and the one thing that would improve my life would be a safe cycl... - surely we need safe and sustainable transport, and the proposals will do anything but achieve this. The council cla... a significant positive impact on walking, cycling and public transport as the development should be designed with the... the positive impact is to be achieved. In addition, there are no illustrations in the Transport Assessment for the propo... proposal to create a new car park on Harts Hill is not backed up by evidence of the need for it.</p> <p>The increased traffic would also have a serious environmental impact, because air quality would deteriorate further. L... calming" on Broad Lane, which is what we would have with possibly 1500+ more cars, causes severe air pollution. T... have a positive impact on the environment, though in fact it is likely to have an adverse effect, damaging the irreplic... in the North Wessex Downs AONB, not to mention farmland that might be needed in the future for food security. The... brownfield sites on which to build houses, not greenfield sites.</p> <p>I am also concerned about the lack of thought to the provision of healthcare. It is difficult enough to get a doctor's ap... thousands more residents, the surgeries will be stretched to breaking point. Where is the Health Impact Assessment...</p> <p>Has the impact of the proposal been considered with regard to infrastructure, in particular foul waste disposal, surface... We have intermittent problems with water supply in Upper Bucklebury, when faults occur at the Harts Hill pumping s...</p> <p>To summarise, I believe the plan is unsound because too many aspects remain unjustified, and the environmental in... north east Thatcham would be severe and irreversible.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Revell, Michael
Consultee Full Name	Mr Michael Revell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS381
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p><u>WBC LPR Regulation 19 Objection</u></p> <p>I am writing to object to the proposed development to the proposal to build 1500-2500 Houses in NE Thatcham because it will have a negative impact on Upper Bucklebury and the surrounding area.</p> <p>1 Transport</p> <p>I am concerned about the extra traffic this will generate through Upper Bucklebury and the additional congestion on the road. I understand that despite assurances that this will have a 'positive impact on road safety' I understand that there will be a displacement of traffic from the site onto Harts Hill. This is of great concern because traffic to and from the site is only going to go in one direction. Upper Bucklebury are narrow and already busy and it is my genuine concern that extra traffic will result in a serious safety issue. Upper Bucklebury to Chapel Row is a long straight road which allows people to drive legally up to 60 miles per hour, making it dangerous to cross at the junction of Carbinswood Lane and Pease Hill.</p> <p>1 Healthcare</p> <p>The proposed development will put enormous strain on our existing GP practices. There appears to have been no discussion with the North East Thatcham Development Consortium and general practices. In the present climate of GP shortages and the fact that GP practices are commissioned by NHS England, and I think it is fair to say there is therefore no realistic prospect of a new GP practice in Thatcham or West Berkshire in the foreseeable future. As far as I am aware, there has been no approach by WBC to any GP practice to discuss opening a new practice. The existing practices are already overstretched and I fear that the additional patients will make a huge demand on our already stretched local GP services.</p> <p>Environment</p> <p>I understand that approximately 4000 people will be living on the development site. These people will need access to green space and that since SP17 has no proven plans for providing adequate green space and protecting biodiversity which will inevitably result in the loss of visiting adjacent green areas. You are no doubt aware that management of Bucklebury Common is explicitly focused on the fragile ecosystems. In addition, despite the Sustainability Appraisal accepting that SP17 will have a negative impact on the environment there is no detail whatsoever of any mitigation measures.</p> <p>In light of the above I feel that the council should take the opportunity to stop this planned development as it is both unsound and has a negative impact on the local area. I am prepared to appear at the public enquiry if invited.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kelly, Joseph
Consultee Full Name	Mr Joseph Kelly
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS390
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 12:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to state my objections to the above plan, with specific reference to Policy SP 17, the proposed North-East Thatcham site, so via this email as I was disappointed to find that the Council's web tool for this task is overly complex, unhelpfully inflexible and difficult to use in relation to the submission of comments by ordinary citizens.</p> <p>THE ENVIRONMENT</p> <p>Placing a housing estate over an area of countryside spells doom for many species of plants and creatures in that area. A "net biodiversity gain" is surely ridiculous and I challenge West Berkshire Council (WBC) to substantiate that claim. The impact of housing developments.</p> <p>Within the area in question, which I walk regularly with my dog, I see hares, foxes, badger spoor and numerous species of insects and meadow plants for which I am too ignorant to know the names. The small areas of "country park"/"community park" that WBC boundary would <u>not</u> contain this diversity. As evidence to support that assertion, I look to the "green" areas in place of modern housing estates, with which I am also familiar as a walker, e.g. the land between the southern developments north/north-east at the sides of the Harts Hill Road between Floral Way and the A4. I invite WBC to commission a wildlife survey that it will reveal massive quantities of litter, but very little wildlife. That is the sad reality of a small green area alongside a housing estate.</p> <p>In this regard, I believe that the SP17 proposal is unsound but also that it contravenes the spirit, and quite possibly some provisions of the Environment Act.</p> <p>THE AONB, BUCKLEBURY COMMON</p> <p>This Government's 2019 manifesto included a pledge to deliver "the most ambitious environmental programme of an ever Conservative Government". The Environment Act was headlined as "a world-leading programme for nature recovery". Yet WBC proposes a vast housing estate on a protected and fragile Area of Outstanding Natural Beauty, Bucklebury Common, with all the inevitable negative impact that would result.</p> <p>A taste of that impact was seen during the 2020 COVID lockdown, which greatly increased the numbers seeking out the open woodland and open common ground, along the footpaths and bridleways, and the many informal paths that weave across the landscape. The impact of a dramatically increased footfall was everywhere visible. New sections of paths were trampled through the thick grasses of original path churned to a quagmire by the volume of feet and wheels. Informal paths, previously nothing more than narrow tracks, were swathed. Plants were trampled, occasional/seasonal water courses disrupted and diverted, ground-nesting birds displaced, and numbers of deer and other mammals noticeably fewer. And a large increase in litter offered danger to those creatures that did still survive. New spaces were created at the sides of lanes, crushing verges, shrubs and saplings.</p> <p>The building of <u>any</u> houses on the NE Thatcham site would undeniably increase the volume of road traffic using the "rat-run". There is nothing in the proposal's Transport Assessment to suggest any measures to limit or prevent this, nor any assessment of likely impact in this regard. The volume of traffic on these lanes is already unacceptable in terms of its impact on the environment.</p> <p>Inherent in a new housing development of any size, there would also be an increase in levels of artificial light at night. WBC attempts to mitigate this, and with consequent negative impact on nocturnal species of mammals and birds.</p> <p>WBC has a legal obligation to "conserve and enhance" AONB's in its domain but instead it plans a development which would result in a massive further increase in the recreational use of Bucklebury Common AONB, and thus in the human impact upon it. This is unsound and not legally compliant.</p> <p>HUMAN SAFETY</p> <p>The volume of traffic cutting through the lanes on Bucklebury Common is a hazard to human safety too. Those same lanes used by walkers and cyclists but are mostly narrow, winding and devoid of either pavements or streetlights. Increased traffic flow would be a significant hazard to human safety.</p>

the likelihood, of injury or death in road accidents. This would fly in the face of both national initiatives and WBC's own for "zero" such events.

And quite how WBC supports its claim that this development would "have a positive impact on road safety" is unimagineable to the Council itself as no genuine evidence is offered to support that statement. It is clearly nonsense as a forecast that WBC is guilty of a gross misrepresentation of the truth in this matter.

SEWERAGE

I witnessed a detailed report, given at a meeting in December 2022 in the Upper Bucklebury Memorial Hall, which dealt with the main sewerage infrastructure in terms that implied it is very close to maximum capacity, or perhaps already exceeding it. It was WBC's Executive Director responsible for planning. He (Mr Owens) raised no argument with the facts and statistics, nor do I see anything in the SP17 proposal to reassure me that any action is intended to address this apparent infrastructure problem. It makes the SP17 proposal unsound.

MEDICAL SERVICES

Publicly available statistics, coupled with patient experience, confirm that the area's general practice surgeries are overwhelmed with their current patient numbers. In the event that the SP17 development were to go forward at any size, if there were no new facility then medical services to the local population would surely collapse, to the very serious detriment of all residents.

And yet I see no promise of this, and no Health Impact Assessment, in the development proposal. The same must be true of other services, which are likewise confirmed as inadequate in this area. WBC must surely have a moral obligation, if not a legal one, in a situation arising. As it stands, the implications of SP17 for medical services in the wider Thatcham area render the proposal unsound.

NATIONAL FOOD SECURITY

The countryside over which this development is proposed is currently to a large extent farmland, seemingly quite fertile and with nothing to go by. The deletion of such land is clearly at odds with central government's rather wider view – the implications as highlighted by the supply-chain events of the past few years and most especially the war in Ukraine. The Government's aim for our country "a healthy and sustainable domestic food supply-chain" (PPS to Environment Minister, 4 October 2022) and the need to be blind to all this?

CONCLUSION

I consider the NE Thatcham Housing Development Plan SP17 to be fundamentally flawed, disturbingly unsound and the reasons given above, and I would willingly attend a public enquiry on the matter.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Mahoney, Geoffrey</p>
<p>Consultee Full Name</p>	<p>Geoffrey Mahoney</p>

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS407
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:56:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>The traffic in Upper Bucklebury has grown massively in the last ten years and this proposal will make it intolerable, particularly on the main road. 1500 houses means possibly 3000 more cars and a proportion of them will use Harts Hill and Brookley Road, the A4. The noise and pollution will be unacceptable. Cycling or walking on Harts Hill is not safe at present and this proposal will cause environmental damage and damage to health.</p> <p>It is not clear that you have given any consideration to infrastructure.</p> <p>Last summer we had water shortages and this will only be exacerbated with possibly 5000 more people all needing water and surface water drainage? Have you consulted with Thames Water?</p> <p>The proposal to build partly on usable agricultural land which may be needed in the future does not make sense. One is not convinced that the WBC have given adequate consideration to alternative brownfield sites.</p> <p>I am concerned about the effect on healthcare in the area, which already is vastly overstretched. The burden of an additional surgery will be insupportable for our current doctor's surgeries. Again, what consultation has taken place?</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Baker, Margaret
Consultee Full Name	Mrs Margaret Baker
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS291
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	25/02/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am objecting to the above as unsound for the following reasons. HEALTHCARE PROVISION A development of the proposed size will have a massive impact on our health services in this area. There is a huge shortage of GPs in this country so there is no realistic prospect for this area of a new GP practice. Added to this the knock on affect to other services the impact would be an unmitigated disaster. SCHOOL PROVISION There seems to be no clear decision within LPR for Nursery or Early Years. It also seems the provision of Primary schools is unclear and contradictory together with unsound details of Secondary Education ie evidence of pupil numbers for so

	<p>funding timings etc. The council has a duty to suitable school provisions and how this is met across all school years in addition sports field provision needs addressing for North East Thatcham.</p> <p>INFRASTRUCTURE</p> <p>There are grave concerns what impact these additional properties will have on the existing roads system around pa</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Palmer, Blaire
<p>Consultee Full Name</p>	Blaire Palmer
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS299
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Web
<p>Response Date</p>	28/02/2023 09:34:37
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	This feels like the least creative way of solving the housing shortage. We are facing a climate emergency yet the only solution is to build on green land. Within Newbury and around Thatcham town centre is a huge amount of poorly designed brownfield, former empty office space and ugly low quality housing. This is the land which needs to be developed. It would mean that people can walk to amenities or jump on the train without using a car. It would improve the look and feel of Newbury and Thatcham by bringing in more people to the area. It would be economical. it would be environmentally friendly and it would require creative, architecturally interesting housing of the variety of housing needed. By contrast your plan simply involves building bland, mass produced houses on land which is currently used as farm land or land used by local people for leisure. This land enhances the quality of life of people living here and provides a variety of wildlife. It separates villages from each other and villages from towns. Such development here will destroy the very reason people want to live here. And let's talk about the infrastructure. In addition to these houses there will need to be facilities, all on this lovely, natural greenfield land. People will be drawn away from the town centres in Newbury and Thatcham (with their empty shops and charity shops, the neglected Kennet centre and shabby sports centre) when we should be encouraging activity in the centre. And the traffic! The level crossing in Thatcham already causes long tailbacks at peak times. The roads coming off the Robin Hood roundabout. To cope with this number of new families coming from the outskirts of the town will either massively increase traffic (and pollution) or require the widening of roads and the building of more roads through the beautiful countryside. At some point we have to stop doing this. When you watch the news and see the climate destroying the world do you consider that these decisions are part of that problem? Do you think that, somehow, this is OK as long as it's not from our cardboard? We need much, much cleverer solutions. We need to have as little impact on the environment as possible. To say these projects are carbon neutral but you cannot have an influx of so many new families, build on greenfield land in parts of the area that then require them to drive to get to amenities and claim there is no impact on the environment is a little bit of your conscience?
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bearman, David
Consultee Full Name	David Bearman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS337
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to lodge an objection against Thatcham NE Development, reason being there is no added infrastructure being</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mullis, Collin
Consultee Full Name	Mr Collin Mullis
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS345
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	27/02/2023 20:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

the statement of common ground.

- * Yes
- * No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

I wish to register my objection to the proposed new 'Thatcham NE Development' as I find it unsound.

Transport

- Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a road through the villages. We sought assurances and were led to understand by WBC planners that traffic from the Floral Way and the A4. This is true but what they 'forgot' to mention was a plan for an exit at the north of the site onto the A4, which was apparent on Friday, 6th January when the Transport assessment was published: Phase_2_Transport_Assessment. **This is serious for us because traffic from, or to, the site is only going to go in one direction from this exit – where it will split between the traffic going through Cold Ash and the traffic through Upper Bucklebury**
- I understand there are access arrangements for the northern end of the NET site proposes new priority junctions (where appropriate) on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause any issues. The document has no modelling results for this. There are drawings for all the other proposed junctions but none for the new ones.
- There are drawings showing a new car park on Harts Hill. The purpose is a mystery but will surely add more traffic to already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park.

Healthcare

- The NE Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to refer to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. **I am bereft of detail or insight into strategic healthcare planning!**
- It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, appear to have conducted a prospective HIA specific to the proposed North-East Thatcham development.
- Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Partnership. **I have a concern that there appears to have been no direct engagement between the North-East Thatcham Consortium and local general practices.**

Environment

I have a concern on three main areas:

- Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area, and its ancient woodlands and heathland Common.
- Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB that will impact on the open countryside by local communities.
- Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient mitigation will be taken after development e.g. through the vague promise of a 'community park'
- Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the plan, I have concluded that there is no evidence to support claims that SP17 will have a positive impact on the environment. **My reason to believe it will have a significantly negative impact.**
- I understand it has been estimated that at least 4,000 people will be concentrated in the development site. The plan does not provide green space for recreation and general wellbeing. We do not believe that the claimed provisions for green space will be sufficient. The original Thatcham Growth Plan had a vague proposal for two 'country parks' spaced across the top of the Opportunity Area, claiming the potential for significant biodiversity enhancement over its current land use
- In the updated SP17 text, the country parks have been downgraded to undefined 'community parks' which only provide a limited benefit. WBC has given to protecting the natural environment and public enjoyment of it.

Education

Information has been provided by WBC regarding education, however I find the plan for secondary school provision is unsound.

- There is no satisfactory evidence of the number of pupils the school is to cater for;
- The location of a school(s) is not clear;
- The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- The timing of the funding is not clear; and
- There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education for all children in West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. Funding for secondary education across all school years is not defined or evidenced in the LPR.

Miscellaneous

	<p>The Regulation 18 Consultation stated that only 1250 dwellings would be built in the plan period, and this I understand is based on the 15000 number. The 15000 number is stated as both a minimum and an approximate number and supporting studies are still based on the assumption that this could increase to the original 2,500 when the plan is reviewed after 5 years or in the next plan period.</p> <p>There is no evidence WBC has consulted properly with Thames Water over the time needed for provisions of water and sewerage for the proposed new dwellings.</p> <p>The Secretary of State's Written Statement of 6Th December 2022, which removed the need to maintain a 5-year housing target to update Local Plans, removed the top-down housing targets (particularly for Local Authorities with constraints like AONBs) and a transition period for LS's in final stages of preparing Local Plans and this statement should be taken into account by the Regulator.</p> <p>In conclusion- because of the concerns I have raised, the Reg 19 PPR Submission in its entirety should be considered for a full review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reeves, Anthony
Consultee Full Name	Anthony Reeves
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS355
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other</p>	E-Mail

* SMS * Web * Unknown	
Response Date	27/02/2023 22:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I have lived at [personal information redacted], but this latest development between 1500 to 2500 houses to be built [redacted] is like adding another town to the already encroached area and feel it is totally unsustainable. I am writing in to object to say No to Thatcham NE Development as the plans presented as I find them unsound, for - Increased traffic flow - this is already over stretched especially getting onto Foxglove Way especially in the morning existing estate, and during schools runs, this new development will only exhaust the situation even further, as there are others. - Healthcare - Thatcham Healthcare Service is already well over stretched, not being able to get a Doctor's appointment see strategic healthcare planning within this newly proposed development. - Impact on the Environment – Building on Greenfield sites which are classed as “Natural outstanding Beauty” and are legally protected wildlife. - Where is WBC plans for reducing pollutant gases on the carbon footprint, supporting this development will surely m
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holden, Wendy
Consultee Full Name	Wendy Holden
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS363
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 20:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The plan has taken absolutely no account of alternative sites, in particular alternative brownfield sites in Thatcham which would destroy an AONB.</p> <p>Bucklebury Says No has identified a number of serious environmental threats posed by the proposed Thatcham site (SP17). These include:</p> <ol style="list-style-type: none"> 1 Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area (*see map at end) [<i>map not included</i>] and heaths, in particular the Common; 2 Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB of the open countryside by local communities; 3 Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that can be taken after development e.g. through the vague promise of a 'community park'. <p>Taken together, and after a thorough professional review of the background documentation provided by WBC in support, we concluded that there is no evidence to support claims that SP17 will have a positive impact on the environment or any reason to believe it will have a significantly negative impact.</p> <p>For example, the WBC states in the LPR that a Sustainability Charter is required to establish how '<i>policy requirements</i>' the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability) <i>be informed by</i> various strategy documents (including one on ecology). Yet, the strategy documents either do not or are not publicly available for the Regulation 19 consultation.</p> <p>We estimate that at least 4,000 people will be concentrated in the development site. They of course must have access to and general wellbeing. We do not believe that the claimed provisions for green space will satisfy this demand on site. The Plan had a vague proposal for two 'country parks' spaced across the top of the slope, inside the Biodiversity Opportunity Area for significant biodiversity enhancement over its current land use. No details were provided about how they would be delivered, showed the complete lack of preparation for such country parks, not least that they should be merged, and properly managed that stated biodiversity enhancement. Now, in the updated SP17 text, the country parks have been downgraded to uncared for only proves how little commitment WBC has given to protecting the natural environment and public enjoyment of it.</p> <p>Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will be increased pressure on visiting adjacent areas.</p> <p>Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green space will '<i>take advantage of the landscape</i>' to '<i>facilitate connection to the AONB, and include leisure routes accessible to a wide range of users</i>'. Meanwhile, the management vision for Bucklebury Common is explicitly focused on <u>not</u> increasing human pressure on the site working to restore and nurture.</p>

	<p>In fact, the LPR's own Sustainability Appraisal accepts that SP17 will have a <u>negative</u> impact on environment greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the p</p> <p>However, the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall po – largely by absurdly ignoring the environmental consequences in favour of social and economic benefits that are an other articles herein) <i>[articles not included]</i>.</p> <p>The overall thrust of the SP17 policy is clearly to build as many houses as possible in a small area of countryside, wh how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on co plans and justify the 'growth' requirement, there is no evidence of any serious attempt to investigate, analyse an consequences. Everything will be all right because their own unsubstantiated policies say it will be.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	WBC have only taken account of information provided by the developers on one site. The developers have not been brownfield areas
<p>4. Proposed Changes</p>	There should be a proper assessment of alternative brownfield sites in the local area.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Barrett, Nick
<p>Consultee Full Name</p>	Nick Barrett
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS435
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Web

Response Date	01/03/2023 20:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	A plan paid for in part by the developers themselves means the premiss is flawed at its origin. The outcome is determined by a non defunct government directive on a 5 year housing plan that is now no longer required.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	There is a poorly thought out document that fails to recognise the detrimental effect on public health, an AONB and cope with its traffic levels, the Thatcham railway crossing is prime example of where the infrastructure cannot support unclear whether it is 1500 houses, 2500 houses or any number in between. The strategy is now not in line with government review.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	Thames water has not been properly engaged on this project.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	No

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bunnett, Jill
Consultee Full Name	Mrs Jill Bunnett
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS327
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	27/02/2023 17:56:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan as I find it unsound.</p> <p>Transport - Harts Hill is the direct route to Upper Bucklebury, Chapel Row and Bradfield and is a very busy road esp afternoon as people go to/from work and children to/from school. There is no footpath and the road is dangerous esp. Latterly the lorries from the gravel pits often take up more than half the road, another hazard. How is it possible to increase, not to mention site traffic, with all the extra pollution it would bring.</p> <p>Access - there are no plans to indicate the location of new priority junctions and what is the purpose of a car park? Traffic antisocial behaviour causing much distress to those living in the vicinity.</p> <p>Healthcare - when did you last try to make a face to face appointment to see a Doctor? Surgeries and dentists in the area are at full capacity both of which would collapse under the huge influx of patients. Consultation with local healthcare providers either by the developers or the WBC. This issue must be addressed.</p> <p>Environment - The site of the proposed development borders AONB and would have a very detrimental affect on the various times during the year there are sightings of deer, foxes, red kites, bats, a huge array of bird varieties and the like. What will happen to these creatures? There are no plans to provide adequate green space and protecting biodiversity. This further add to traffic congestion, especially on Harts Hill.</p> <p>I have seen no solution put forward to combat the problem of water drainage off the hill. After heavy and prolonged rain Floral Way is saturated and not suitable for building on. The issue would be exacerbated by building roads, houses and the like. The water to go so flooding would be inevitable in some areas.</p> <p>In conclusion, based on the objections above, I am of the opinion that the proposed development is ill conceived, unworkable and a disadvantage to everyone.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gould, Joan
Consultee Full Name	Joan Gould
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS340
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 13:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to formally object to the proposed Thatcham North East Housing Development as I believe that the approved plan is unsound for the following reasons:</p> <p>Healthcare</p> <p>As I understand it, only vague references have been made towards the provision of infrastructure to support such a development, such as medical services, etc.</p> <p>On the subject of healthcare, a 450 sq/m primary healthcare facility with the suggestion that a GP surgery be offered to the development was presented to the Integrated Care Board but the document contains no details into strategic healthcare planning. A development of this scale requires a fit for purpose Health Impact Assessment (HIA) according to current guidelines from Public Health England. The current HIA is overstretched so obviously there would be serious negative impact on both existing and new residents. The only reason a HIA is that the inevitable conclusion would be an acceptably high negative impact on existing and new communities and such a development should not be permitted. Again, the proposals for this development are fundamentally unsound as any required documentation has been deliberately ignored. None of the local GP practices have been consulted and none would be prepared to take the development as a branch surgery on economic/practical grounds.</p> <p>The same argument applies to the provision of dental services in the Thatcham area.</p> <p>Transport</p> <p>There would be serious traffic management issues with the major trunk route of the A4 (single carriageway and currently used for the majority of the traffic). The plan includes an exit from the development onto Harts Hill Road, a single track road serving the village of Upper Bucklebury. With the inevitable congestion caused along the A4, this will lead to much of the traffic seeking an alternative route through the unlit villages eastwards through Upper Bucklebury, Chapel Row and Bradfield Southend. Potentially, much of the traffic will be heading in a westerly direction towards the Bradfield College area. Any traffic heading in a westerly direction would inevitably make its way through Cold Ash Road junction 13, passing by the schools of St Finian's Catholic Primary School and Downe House School. The current proposals are unsound and unsafe to the point of being dangerous. Furthermore, WBC claim that modelling suggests that these new roads will solve the problems. However, they not produced any modelling results to this effect. For some reason WBC have also failed to consider the impact on the Hill junction. This again would seem to be unsound as scant thought appears to have been applied.</p> <p>Environmental</p> <p>The land that it is being considered for development is currently on a green field site and is prime agricultural land. As a result of the development to become more self-sufficient in our foodstuff production and less reliant on imported goods. Furthermore, the land at the development (a Common) and such a large development would have a huge detrimental effect on such a fragile and diverse eco-system. A full environmental consideration has been given to the negative impact on this valuable resource.</p> <p>Much of this land also lies in the Kennet river valley which at present floods regularly down stream – a situation which is a significant problem for the neighbouring communities.</p> <p>I do not believe that WBC has given serious consideration to brown field sites that are currently available for development.</p> <p>Education</p> <p>WBC as an Education Authority has a duty to make arrangements for suitable school provision. How this obligation will be met is not defined or evidenced in the LPR. It is therefore clear that the plan for secondary school provision is unsound for the following reasons:</p> <ol style="list-style-type: none"> 1. There is no satisfactory evidence of the number of pupils the school is to cater for. 2. The location of the school is not clear. 3. The number of Form Entries is not defined but it is noted that anything less than a 6FE school is unsustainable. 4. The timing of the funding is not clear. 5. There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education for the number of pupils the school is to cater for. <p>Timing of the LPR Consultation</p> <p>At the outset, one of the reasons given for this development was to fulfil WBC's obligation to meet certain Government obligations. One of the reasons to use this particular area was that there was nowhere else suitable due to the high percentage of AONB and nuclear fall out.</p>

At the time, it was acknowledged that the siting was far from ideal. Since the latest announcements from Michael Gov (Up, Housing and Communities) a Written Ministerial Statement was released setting out forthcoming amendments to the Framework (NPPF).

The Statement set out the following (inter alia):

I will retain a method for calculating local housing need figures, but consult on changes. I do believe that the plan-making process should start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory. It will be used in consultation with their communities, to determine how many homes can actually be built, taking into account what should be protected, such as the precious Green Belt or national parks, the character of an area, or heritage assets. It will also be up to them to increase housing if they wish.

My changes will instruct the Planning Inspectorate that they should no longer override sensible local decision making based on local constraints and concerns. Overall this amounts to a rebalancing of the relationship between local councils and the Government to give local communities a greater say in what is built in their neighbourhood.

Obviously none of this has been taken into consideration. Local communities have been totally ignored. The precious Green Belt, the AONB will be severely impacted. The fact that the site was not ideal at the outset and the mandatory requirements for it is unsound to go ahead and develop on an unsatisfactory site.

Furthermore, the information available to support the current consultation (Reg 19) being undertaken on the Local Plan is riddled with factual inaccuracies.

The housing numbers for northeast Thatcham – positioned in Reg 19 as a reduction from 2500 dwellings to 1500 - is a minimum and an approximate number and the supporting studies are still based on an eventual size of 2500 dwellings. Consultation envisaged that only 1250 dwellings would be built in the plan period, and this has increased to 1500. The number of sites that have been added since the last update, and which have been rejected. The WBC process is the process not the end.

The Air Quality Assessment that is part of the consultation documents is based on the LPR running to 2037, not to 2025, which affects the traffic levels forecast for the end of the LPR period and the resultant traffic pollution.

There is no evidence WBC has complied with its legal duty to cooperate with Berkshire West Clinical Commissioning Group (WBC) GP surgery promised for north east Thatcham.

There is no evidence that WBC has consulted properly with Thames Water over the time needed for provision of water supply to the houses for north east Thatcham are deliverable in SP17 in the plan period.

The Settlement Boundary background paper shows the Thatcham settlement boundary already extended to the line of the 2500 houses, yet the plan now refers to a minimum of 1500 houses – this could be read that 2500 dwellings is still suitable within the extended boundary.

The new provision for secondary schools in north east Thatcham is not consistent with WBC guidelines for the minimum viable size for a secondary school. If the primary provision is 2.5 Forms of Entry, then so presumably is the secondary provision to meet the impact policy 2013 states that the minimum viable size for a secondary school is 4 Forms of Entry.

The Secretary of State's Written Statement of 6th December 2022, which removed the need to maintain a 5-year housing target with up-to-date Local Plans, removed top-down housing targets (particularly for Local Authorities with constraints like the Green Belt) and a transition period for LAs in the final stages of preparing Local Plans and this statement should be taken into account. Because of these points, and many more, the Reg 19 LPR Submission in its entirety should be considered as unsound.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Spokes, Julie
Consultee Full Name	Julie Spokes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS344
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 14:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I hereby object to the above plan as I find it unsound in a number of important regards:</p> <ul style="list-style-type: none"> • The plan for a car park near and junction exiting onto Harts Hill Road is ill-considered. It will increase traffic onto an unpaved area with no pavements and no road lighting. The sharp bend on this road is already dangerous; oncoming traffic is frequently travelling over the centre line. This road is also regularly in a dreadful state of repair and road markings are often virtually non-existent here for serious accidents to occur. • The plan is likely to see a significant increase in traffic through Upper Bucklebury towards Chapel Row and Southdown. Stretches of road across Bucklebury Common are again unrestricted, unlit, have no pavements and are very poorly maintained. Groups of deer often run from the common across the road without warning and cause accidents. I have personally been hit by the front bumper of my car. • The plan needs to better consider the provision of suitable medical and dentistry facilities. At the Chapel Row surgery, the premises have been extended but at times there is still a need for people to park on the grass opposite (along the Avenue). This is a problem that is likely to get worse if the plan is approved. • The plan will, because of the number of proposed houses and therefore people and cars involved, inevitably place additional pressure on the important and fragile ecosystems on Bucklebury Common and the wider AONB. These should not be sacrificed for short-term and economic benefits. • What provision is to be made for shopping locally? There is already an insufficiency of supermarket shopping in the area (the relatively small Waitrose) with inadequate parking facilities. There will inevitably be a significant increase in traffic from the need to access Pinchington Lane (Newbury) shops via the Greenham Common Road - with associated local congestion and noise. This is true for both Newbury and Calcot. None of this is good news for the area where the roads are already in an atrocious state.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Long, Francis
Consultee Full Name	Francis Long

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS358
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 17:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>This is to confirm my objection to this development which has been ill thought through.</p> <p>Whilst not in an AONB the sheer scale in number of the proposed dwellings would have a detrimental effect on the AONB in the wrong place, being too close to Bucklebury and Midgham.</p> <p>If there have to be a certain number of homes built in West Berks, and even that is highly debatable, Colthrop would be a better option. Issues could be over-come, but any site that is already partially brownfield, rather than green fields, would be a better option.</p> <p>In conclusion there are too many homes and they are in the wrong place. This must seem obvious even to anyone who has visited the area.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	If there have to be a certain number of homes built in West Berks, and even that is highly debatable, Colthrop would be a better option. Issues could be over-come, but any site that is already partially brownfield, rather than green fields, would be a better option.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pinkard, Penny
Consultee Full Name	Penny Pinkard
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS378
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	01/03/2023 10:25:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
Please give reasons for your answer	<p>The LPR is not positively prepared and would not achieve the goal of sustainable development for WBC and the w</p> <p>The LPR is not justified. Many of the grounds for assessment of impacts and benefits lack credibility and is not based on alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Th</p> <p>strategy for WBC.</p> <p>The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is del</p> <p>The LPR is not consistent with national policy. In many instances the allocation for development of North East Th</p> <p>directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.</p> <p>My Objections are:-</p> <p>Education</p> <p>The Local Plan Review (LPR) is scant on detail for provision though Nursery to Secondary education. It breaches th</p> <p>education facilities for children. Without this how can such a large housing development be contemplated?</p> <p>The LPR proposes a sum of £12million to be contributed by the developers for Primary Education. With no current d</p> <p>a reasonable number. It does not refer to timing of such development, which would need to be in place before familie</p> <p>Current Secondary school place allocation is driven by distance from the school. Such a density close to the oversubs</p> <p>places to families from the surrounding rural villages and removing any choice.</p> <p>The plan for secondary school provision is unsound:</p> <p>No satisfactory evidence of the number of pupils the school is to cater for.</p>

	<p>No clearly defined location for a proposed school.</p> <p>Number of Form Entries in not defined , so how can it be declared that a new school will be developed , when at least to be viable?</p> <p>The timing and amount of funding is unclear as to whether it is sufficient?</p> <p>Transport</p> <p>The WBC accepts that there will be 'some displacement of A4 traffic onto wider rural areas such as Upper Bucklebury Assessment Report July 2021 shows an exit onto Harts Hill. Traffic exiting here will most certainly continue on the rural roads Cold Ash & Chapel Row and is in addition to 'some displacement'.</p> <p>The new residents in the development will be commuting to Reading and Newbury so soon the Chapel Row – Cold Ash is a choice. This is a rural road with existing accident blackspots, with little pedestrian provision.</p> <p>The Transport Assessment proposes priority junctions at each exit from the site, but show no modelling evidence, and no drawings.</p> <p>Safe and Sustainable Transport</p> <p>The Strategic Environmental Assessment (SEA) , Objective 4 is "To promote and maximise opportunities for all forms of transport. Increasing traffic onto the surrounding rural roads is counter to Objective 4.</p> <p>Public Transport to the rural villages will not be supported by the development as the desirable routing would be by e</p> <p>Healthcare.</p> <p>Given the size of the proposed development, why is there no Health Impact Assessment (HIA)? How does the proposed development fit into the existing provision? It is my understanding that it is unlikely that an existing GP practice would entertain the proposed development. Consequently, the demand will spill over into already overcrowded GP practices.</p> <p>Environment</p> <p>I can find no evidence in the WBC submission to support the claims that the development will have positive impact on the environment. The Appraisal accepts that the development will have a negative impact on environmental sustainability, declaring this would be the case if no such measures are provided.</p> <p>I would estimate an additional 4,000 people will be looking to have access to green space for recreation and well being 'green parks' which have no accepted definition and can hardly be interpreted as taking access to green space seriously.</p> <p>The natural focus of the 4,000 inhabitants will be the Ancient and protected woodlands adjacent to the site, counter to the fragile ecosystems of Bucklebury Common.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Marriage (Represented by ET Planning)
Consultee Full Name	Messrs Marriage
Consultee Organisation	
Agent Full Name	Robyn Milliner
Agent Organisation	ET Planning
Comment ID	PS400
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:54:00
Attached Files	PS400/PS401 ET Planning obo Messers. Marriage Attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

delivery of sustainable development in accordance with the policies of the NPPF.
* Yes
* No

Please give reasons for your answer

These representations conclude that given the sites close proximity to the proposed residential development on Policy SP17 site allocation, it is considered that firstly the Site should be included within the site allocation boundary of Policy SP17 and secondly it should be included as a biodiversity net gain and/or strategic alternative natural greenspace for the wider allocation. If required, it is considered that the Site could also be hosted on the Site.

Introduction to the Site

As explained above, our clients own the Site named land to the north east of Floral Way, Thatcham. This has been in the ownership of our clients for many years, with the Site previously being part of a wider ownership which has reduced as parts of the Site have been sold.

The Site is a square shaped parcel of land to the east of Thatcham which comprises of a telephone mast and number of trees. The Site is also subject to two Tree Preservation Orders (TPOs) on the Site itself, however the Site is designated as ancient woodland (The Plantation) to both ancient woodland and TPOs. The Site has an existing and established highway access from Floral Way. The Site is also designated as a Local Wildlife Site (SU56J01).

The Site is adjacent to the settlement of Thatcham, which is identified as an Urban Area in the settlement hierarchy. The Site is adjacent to a wide range of services and are to be the focus for the majority of development. The western site boundary adjoins the settlement of Thatcham.

There is one record of planning history on site, this relates to the approval for the erection of a 15m high lattice tower and antenna (00/00388/TELE42) in August 2000. The Site has not formed part of an allocation in a Local Plan previously.

Housing and Economic Land Availability Assessment (HELAA) analysis for the Site

The Local Plan Review is supported by a number of evidence base documents. The HELAA is a key evidence document. The latest HELAA was published in January 2023, ahead of the Local Plan Review consultation. The Site has been included in the HELAA as THA22: Land to the north east of Floral Way, Thatcham and was added as a new site in the most recent HELAA.

The HELAA notes that the Site is adjacent to the settlement boundary, its existing use is described as a telephone mast and woodland amenity as part of the North East Thatcham development. It is described as greenfield land with a site area of 0.65 ha.

The Site was shown to have very few constraints within the HELAA, however, it is ancient woodland. Furthermore, the Site is adjacent to a wide range of services and are to be the focus for the majority of development. The Site has the lowest probability of flooding. Given the woodland constraint, it is considered that the site could be suitable for residential development.

<Specific comments on other policies are logged in the relevant place>

The inclusion of Policy SP17 (North East Thatcham Strategic Site) is welcomed within the Regulation 19 Plan. In terms of the emphasis on green infrastructure and biodiversity net gain within the policy is supported. However, it is considered that the Site adjacent to the site on the western boundary, should be included within the site allocation boundary of Policy SP17.

It is considered that the Site was not suitably assessed for allocation through the emerging Local Plan as it had not been included in the Council prior to 2018.

The evidence base supporting the Policy SP17 site allocation is based upon the Thatcham Strategic Growth Study three part study undertaken between 2019-2020, prior to the site being submitted to the Council.

Stage 2 of the Thatcham Strategic Growth Study assesses the HELAA submissions to determine the sites which may be included in the Local Plan. It can be noted that the Site has been excluded from this study, as shown in figure 1, as it was not known to the Council at the time of the study. In the most recent HELAA published in January 2023. In line with paragraph 35a) of the NPPF in which lists the tests that sites must be tested against, it is considered that criterion b) has not been satisfactorily met. <Fig 1 in attachment>.

Suitable uses for the site

As outlined above, it is considered that the Site was not considered through the Thatcham Strategic Growth Study as it was not known to the Council prior to 2022.

The masterplan for the site as outlined in the third stage of the Thatcham Strategic Growth Study shows the area adjacent to our client's site as residential, as shown in Fig 2. It is important to note that the area south of our client's site (and which is included within the site allocation boundary) also has a number of trees which are over 5 years and therefore are in a comparable position to our clients site. <Fig 2 in attachment>.

The HELAA concludes that the Site is suitable, available, achievable and potentially developable. In addition, it states that the Site is suitable for residential development. The site currently comprises of woodland'. The site currently comprises of woodland'.

The HELAA concludes that the Site is suitable, available, achievable and potentially developable. In addition, it states that the Site is suitable for residential development. The site currently comprises of woodland'.

The HELAA concludes that the Site is suitable, available, achievable and potentially developable. In addition, it states that the Site is suitable for residential development. The site currently comprises of woodland'.

National Planning Policy Framework paragraph 32 requires 'Local plans and spatial development strategies should be prepared in conjunction with a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plans meet the economic, social and environmental objectives (including opportunities for net gains).'

The National Planning Policy Framework 2021 para 174 (d) requires 'planning policies and decisions should contribute to the protection and enhancement of the local environment by minimising impacts on and providing net gains for biodiversity'. Paragraph 179 b) also requires that planning policies and decisions should 'promote the conservation, restoration and enhancement of priority habitats and species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.

The National Planning Policy Framework 2021 para 174 (d) requires 'planning policies and decisions should contribute to the protection and enhancement of the local environment by minimising impacts on and providing net gains for biodiversity'. Paragraph 179 b) also requires that planning policies and decisions should 'promote the conservation, restoration and enhancement of priority habitats and species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.

The National Planning Policy Framework 2021 para 174 (d) requires 'planning policies and decisions should contribute to the protection and enhancement of the local environment by minimising impacts on and providing net gains for biodiversity'. Paragraph 179 b) also requires that planning policies and decisions should 'promote the conservation, restoration and enhancement of priority habitats and species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.

The Environment Act 2021 introduces a requirement for developments to provide a minimum of 10% biodiversity net gain. This requirement is emerging which when in place will make this a statutory requirement in law, and therefore required for all developments. The Government have recently confirmed (on 21 Feb 2023) through their consultation response to the consultation on Biodiversity Net Gain Regulations that the 10% requirement will come into force in November 2023, and Summer 2024 for smaller sites. Fig 3 shows opportunities for biodiversity net gain as taken from the Thatcham Strategic Growth Study. <Fig 3 in attachment> .

The Environment Act 2021 introduces a requirement for developments to provide a minimum of 10% biodiversity net gain. This requirement is emerging which when in place will make this a statutory requirement in law, and therefore required for all developments. The Government have recently confirmed (on 21 Feb 2023) through their consultation response to the consultation on Biodiversity Net Gain Regulations that the 10% requirement will come into force in November 2023, and Summer 2024 for smaller sites. Fig 3 shows opportunities for biodiversity net gain as taken from the Thatcham Strategic Growth Study. <Fig 3 in attachment> .

The Environment Act 2021 introduces a requirement for developments to provide a minimum of 10% biodiversity net gain. This requirement is emerging which when in place will make this a statutory requirement in law, and therefore required for all developments. The Government have recently confirmed (on 21 Feb 2023) through their consultation response to the consultation on Biodiversity Net Gain Regulations that the 10% requirement will come into force in November 2023, and Summer 2024 for smaller sites. Fig 3 shows opportunities for biodiversity net gain as taken from the Thatcham Strategic Growth Study. <Fig 3 in attachment> .

Given the Sites close proximity to the proposed residential development on Policy SP17 site allocation, it is considered that the Site should be included within the site allocation boundary of Policy SP17, as other similar sites have been and secondly it should be included as a biodiversity net gain and/or strategic alternative natural greenspace ('SANG') for the wider allocation.

	<p>Site availability and achievability for supporting uses</p> <p>As outlined previously, the Site should be included within the red line boundary of Policy SP17 – North East Thatcha that The Site could be used for biodiversity net gain for the wider site. Given the existing mast, which is located on th that the Site could to host supporting infrastructure for the new residents on site, for instance as 5G telecommunicat my clients inform us that there is a long established 33000-volt overhead electricity line which comes into the site fro inside the northern boundary where it goes underground across the site in a south easterly direction to feed Thatcha might lend itself for a Pod of High- Speed Electric Car Charging Units?</p> <p>In addition, in relation to the suitability of the Site being included within the red line boundary this representation con</p> <ul style="list-style-type: none"> • The Site is available to be included within the LPR. • There are no known issues to prevent the Site being included within the red line boundary of the strategic site • There are no known issues which would prevent the site from being included within the boundary of the wider • The Site is achievable. • The Site is suitable for strategic alternative natural greenspace/ biodiversity net gain for the wider site allocatio <p>Summary</p> <p>Thank you for providing my clients the opportunity to comment on the draft policy documents. This representation ha in the emerging Local Plan as well as relevant evidence base documents.</p> <p>To conclude, given the Sites close proximity to the proposed residential development on Policy SP17 site allocation, should be included within the site allocation boundary of Policy SP17 and secondly it should be masterplanned to pr strategic alternative natural greenspace for the wider allocation. If required, it is considered that the Site could also host t</p> <p>In addition, in relation to the suitability of the Site being included within the red line boundary this representation con</p> <p>The Site is available to be included within the LPR.</p> <ul style="list-style-type: none"> • There are no known issues to prevent The Site being included within the red line boundary of the strategic site • There are no known issues which would prevent The Site from being included within the boundary of the wider • The Site is achievable. • The Site is suitable for woodland use amenity/ biodiversity net gain for the wider site allocation. <p>We look forward to being involved further and may provide additional representations and evidence at the Examination</p> <p><i>For full response and figures see attachment.</i></p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>To represent my clients' best interests and explain the merits of the site and why it should be included within the site</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pembroke, Trevor
Consultee Full Name	Trevor Pembroke

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS410
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 17:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>I am writing to object to the above plan as I feel it is unsound.</p> <p>My wife and I have lived in Chapel Row since the beginning of 1979 (nearly 44 years). In that time we have raised a family and acquaintances and become very much part of village life.</p> <p>We have been extremely happy here and plan to spend the rest of our lives here.</p> <p>Over the past five years or so, traffic in the village has seen a big increase, especially when there are problems on the village roads do not have paths and street lighting. Drivers do not always take notice of the speed limits through the common. With the proposed plan to build at least a further 1500 houses in the North East of Thatcham, we foresee a need for plans for possible speed restrictions or calming measures proposed. We can see the potential for serious accidents.</p> <p>We use the footpaths and byways on Bucklebury Common regularly for walking and exercising the family dogs, (especially in winter). However, over the last few years this has become increasingly spoiled by people driving their quad bikes, motorbikes etc. not intended for this purpose. Also fly tipping is on the increase. Allowing more people access will undoubtedly result in a significant impact on walking, cycling, horse-riding. It will also impact on the wildlife in the area.</p> <p>The plan will have a big impact on education in the area, especially secondary education, and NHS doctors, and dentists. There appears to be no serious attempt to investigate and address the consequences of building such a large number of brownfield sites around that would be more suitable and less impactful.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Allison, Roger</p>
<p>Consultee Full Name</p>	<p>Roger Allison</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS483</p>

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lloyd, Richard
Consultee Full Name	Richard Lloyd
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS458
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 10:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>I am objecting to the West Berkshire plan on the basis of over-development in the area.</p> <p>Plenty of new housing has already been built and it will fall within the AONB. The current roads will not be able to handle already extremely busy especially in the Bucklebury area which is already struggling to cope with the existing traffic. That beautiful part of the area and set a precedent for further development. Plenty of new housing has already been built and was understood to be the boundary to ensure no new housing would be built past there and up the hill.</p> <p>Also it would place considerable strain on the current infrastructure (roads etc).</p> <p>For the reasons above I strongly object to the plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Please refer to objections stated above
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ember, Isabel
Consultee Full Name	Isabel Ember
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS478
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 12:57:00
Attached Files	PS478 Isabel Ember Photos.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>The 2021 Environment Act states that by the end of 2023, all new developments in England are meant to be providing net gains. This means that, before any development begins, there is a legal requirement for WBC to submit a biodiversity net gain statement and proposed biodiversity values of the sites.</p> <p>The SP17 Northeast Thatcham site has a much higher biodiversity value than the WBC might appreciate with ponds and meadows immediately on its perimeter. But there no firm plans within the LPR to retain, protect or monitor these local biodiversity meadow buffer zones around the development or within the site.</p> <p>Once built on, this greenfield land will be removed for perpetuity, and the next generation would not thank us for that. In addition to the issue of legal non-compliance, the soundness of the LPR is questionable for reasons given below.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The LPR is unsound because: ENVIRONMENT.</p> <ol style="list-style-type: none"> Given the UK is one of the least biodiverse countries in Europe, there is no plan within the LPR as to how a 10% (requirement) will be achieved. There is no probability of a biodiversity net gain because SP17 is a greenfield site. The LPR is inconsistent with national policy (NPPF, section 15, page 50) for 'protecting and enhancing landscapes 'recognising the intrinsic character and beauty of the countryside'. There is no reference within the LPR for an Ecological/Biodiversity plan to include wildlife corridors and buffer zones and prevent collateral damage to woodland. There is no reference within the LPR for a 'Net Zero Carbon' report detailing carbon and methane emissions during concrete, steel, and tarmac manufacture, and construction vehicle emissions). These are likely to constitute hundreds of CO2-equivalent emissions and there is no plan to offset these either through tree-planting or a carbon offset levy on (are doing). The LPR is inconsistent with WBC's own Core Strategy (2006 - 2026) to 'maximise the use of brownfield land and Lord Deben (Chairman of the UK Independent Committee on Climate Change, and former Conservative Party Chancellor) that 'planning laws should assert that every decision should be made with climate and sustainability in mind'. The LPR does not address climate and/or sustainability. Why can't West Berkshire be a Climate and Sustainability Leader rather than bowing to political to meet housing quotas? Bucklebury Common is a fragile woodland and heathland infrastructure. Siting 1,500 homes in the immediate vicinity of 'community park' would cause significant degradation to the wildlife population and significantly increase the risk of wildfires in the hot summers (there were two brush fires on the Common in 2022). Significant biodiversity loss, habitat fragmentation, and loss of local carbon sinks (meadows, wetlands and woodland) will occur through construction with collateral damage occurring in and around the site. There is no plan in the LPR to monitor and mitigate this. No reasonable alternatives for the site have been presented: the SP 17 Policy has not shown that it has considered alternatives that are beneficial to the community and less onerous for biodiversity and the environment such as modest-sized wind farms. Why can't West Berkshire be a 'Climate Leader'? There is no discussion in the LPR detailing how it would limit further residential and industrial sprawl along the A4. Further urban sprawl is part of the plan. The development will raise surface runoff into the Kennet River valley which will increase flooding risk along the river. <p><Photos in attachment></p> <p>NEWBURY TOWN CENTRE REGENERATION</p> <p>12. In my view, West Berkshire Council should be stimulating residential growth within Newbury town centre to mitigate the impact of the current time the Kennet Centre near the original Debenhams (rather than the more recent Parkway site) is empty and should be reinvigorated with high quality apartments with roof gardens and courtyards to attract people to live in that part of the town. Is the southern end of Northbrook Street? Otherwise, Newbury town centre will begin to fail. Locating 1,500 families in the use of Newbury amenities.</p> <p>TRAFFIC AND POLLUTION.</p> <p>13. There is no plan for how the additional traffic (the heavy vehicle traffic during construction and 4,000 cars per day) will be managed through the villages of Bucklebury and The Ridge, Cold Ash. In fact, there is no detail in the LPR on the duration of construction, how many vehicles will be involved, where the access will roads be, and how construction will be monitored and controlled to limit the impact.</p> <p>14. To counteract the increased traffic and vehicle pollution on the A4, Floral Way and Harts Hill Road, and in line with the Council's Emissions strategy, WBC needs to issue a plan for the use of Zero Emission Vehicles on the site.</p> <p>HEALTHCARE</p> <p>15. No substantive discussion is included in the LPR to indicate that thought has been given to the impact on Chapeau when a significant proportion of 4,000 new patients are enrolled. Furthermore, a new healthcare facility is mentioned in the LPR, when it will be operational, nor how it will be staffed given a shortage of medical professionals in the area.</p>

	<p>EDUCATION.</p> <p>16. There is no reference in the LPR as to how increased nursery, primary and secondary education will be provided education facilities will need to be built and where? (attachment)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>The Duty to Cooperate places a legal duty on WBC to engage actively and regularly with the community with respect to planning. It remains to be seen how, going forward, the WBC will act on view and recommendations from those who oppose the LPR SP17 Policy. Hopefully recommendations will be acted upon and there will be opportunities for Bucklebury and Thattham communities rather than WBC ignoring the views of the communities in favour of pressure for local housing quotas.</p>
<p>4. Proposed Changes</p>	<ol style="list-style-type: none"> 1. The LPR needs to incorporate a Biodiversity Net Gain Plan and Environmental Impact Assessment (EIA) to measure biodiversity values of the sites and prove that there will be a biodiversity net gain which must then be monitored. 2. It seems there is little likelihood of a demonstrable biodiversity net gain because SP17 is a greenfield site. Building an AONB would be severely detrimental for existing and future communities, animals, and plants in the county and district. More likely there will be a significant biodiversity loss in an area already under threat. This needs to be addressed. 3. There needs to be an Ecological/Biodiversity plan within the LPR to include 500 metre wildlife corridors and green infrastructure (between the edge of the site and the development; and throughout the site). 4. WBC needs to issue a 'Net Zero Carbon' report detailing all emissions during construction, carbon generated through operation, and mitigation and offset. 5. This LPR is inconsistent with the NPPF on protecting landscapes, biodiversity and soils; recognising the intrinsic value of the countryside; providing net gains for biodiversity; establishing resilient ecological networks; improving air and water quality. The LPR is inconsistent with WBC's own Core Strategy (2006 - 2026) because the SP17 Thattham NE development is a greenfield, not brownfield site. 6. West Berks Council in its SP17 Thattham NE development proposal has given virtually no thought to climate and carbon emissions. This needs to be addressed. 7. WBC needs to generate a report, in conjunction with Royal Berkshire Fire and Rescue Service, assessing the fire risk and access to Bucklebury Common (which is tinder-dry in Summer and prone to woodland fire), and how this will be mitigated. 8. Account needs to be taken of the loss of local carbon sinks through the destruction of the soils, meadows, wetlands and trees in the SP17 area. This need to be addressed in the EIA and a mitigation plan put in place. 9. a) WBC needs to demonstrate that it has considered alternative uses for the SP17 land which are more ecologically sustainable to the community and biodiversity. For example, did they consider a modest-sized wind, solar farm or rewilded countryside? b). Further, it needs to show that brownfield sites within the town centre (such as the Kennet Centre and the old Debenham) will be used for additional accommodation with the intent of helping to regenerate the southern part of town Newbury. 10. The WBC needs to generate a report detailing how it would plan to prevent further urban sprawl along the A4 towards the town centre. 11. A drainage plan needs to be generated to show how the additional surface runoff generated on the flanks of a hillside will be managed on the A4 and Floral Way. 12. More consideration and lateral thinking needs to be demonstrated by WBC in considering sites for 'green urban' development. For example, the southern part of Newbury town centre. 13. There is no plan for how the additional traffic (the heavy vehicle traffic during construction and an estimated 4,000 extra vehicles per day) will be routed through the villages of Bucklebury and The Ridge, Cold Ash. More detail is required on the duration of construction, the number of construction vehicles involved, where the access roads will be, and how construction will be monitored and controlled. 14. To counteract the increased traffic and vehicle pollution on the A4 and Harts Hill Road, and in line with the Government's strategy, WBC needs to issue a plan for the use of Zero Emission Vehicles on the site. 15. A Healthcare Impact Assessment needs to be generated to assess the impact on Chapel Row and Thattham surgery if 4,000 new patients are enrolled; and how and where a new healthcare facility will be installed, operational and staffed. 16. A Pre-Secondary and Secondary Education Plan needs to be produced to cover items such as: number of expected pupils, the timing of funding, staffing, breadth of curriculum, facilities, traffic impacts etc.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jolley, Robert
Consultee Full Name	Robert Jolley
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS530
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 15:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to register my strong objections to these proposals.</p> <p>The plan to build between 1500 and 2500 houses on farmland below my property here will have a seriously detrimental impact on my neighbours here. There will be a huge impact on the wildlife and quiet darkness which is currently enjoyed here. Furthermore, 2500 cars on the local area will be huge resulting in significantly increased congestion with a very negative environmental impact, an extra burden on local schools, GP surgeries and all services.</p> <p>It makes no sense that West Berkshire Council (WBC) are still pushing forward with these plans when the Government has made changes to the national planning system whereby central government will no longer set mandatory targets for housebuilding. Gove (Secretary of State for Levelling Up, Housing and Communities) released a Written Ministerial Statement setting out the new approach to the National Planning Policy Framework (NPPF)</p> <p><i>It will be up to local authorities, working with their communities, to determine how many homes can actually be built, and how green belts be protected in each area - be that our precious Green Belt or national parks, the character of an area, or heritage assets.</i></p> <p>As the new proposed Local Plan, which includes the North East Thatcham new town (that is in effect what it is) has been approved, the rules, it is now fundamentally unsound. Several Local Authorities have paused their plans whilst they await the outcome of the new national planning policy on the basis that a lower housing requirement could be applicable to the plans than the one currently in place. I feel that WBC should take the opportunity, as others have, to pause the plan making and to bring forward a revised plan in line with the guidance when this comes in later in 2023. Instead, WBC have sought to push through the new Local Plan quickly, without regard to the new national policy. This failure to respond to a very significant change in national policy renders the current plans fundamentally unsound.</p> <p>WBC have further made the irrational decision to continue to use the government housebuilding estimates from 2014 with no revisions to those projections, specifically in 2016, which lowered the requirement. Yet WBC has chosen to ignore the new national policy and the LPR unsound.</p> <p>There are serious questions about why WBC has been pushing plans for the NE Thatcham site using just one developer. The developer funded a report for WBC on the plans which, to no surprise, gave full support. It is at best irregular and poor practice for a report to be funded by a developer with a vested interest. The report should not play any part in the consideration of the plans. In its place there should be a further and truly independent report.</p> <p>There are further serious questions why WBC refused to engage with other developers, namely Croudace, who have been working with Colthrop which is much better suited to development and has the added advantage that Croudace would fund and build the development. This would be highly beneficial in easing the delays and congestion at the level crossing at Thatcham. Yet WBC have chosen to ignore this and are out of hand. That suggests unsound practice.</p> <p>The farmland around our properties here at <personal details> are owned by Wasing Estate and they have been shown to be productive for many years with a variety of crops. With the increased focus on UK food security, it makes no sense to build on productive farmland. WBC has recently reiterated that future developments must be prioritised on brownfield sites.</p> <p>If the farmland is built on there will be a significant detrimental environmental impact as it is current home to a great many species of animals. WBC have been woefully inadequate in their consideration of this impact.</p> <p>On the broader issue of development, the Newbury/Thatcham area has already been impacted by a huge increase in housing. This is a very large and continuing development at Newbury racecourse, the Donnington Heights development, the new retirement homes at Thatcham, the development on Bowling Green Road. There are many other examples. This part of West Berkshire is already overdeveloped and the proposal to just place 1500/2500 on farmland is totally lacking in merit.</p> <p>There are serious questions about why WBC think the NE Thatcham site is suitable. In recent years they rejected the development at Siege Cross, which forms part of the current NE Thatcham plans, with thorough and substantive reasons for their rejection. Yet they then forcefully supporting development on the site they rejected. WBC need to explain how they have come to do so.</p>

WBC have failed to undertake an adequate flood assessment for the NE Thatcham site, which is just as much at risk, parts of Thatcham where substantial works have been undertaken. The plans put forward by the developer are woefully inadequate and have been rejected outright. The highly flawed report for WBC, as I have pointed out funded by the developer, is cast in doubt.

If the NE Thatcham plan is approved, it will create unsustainable pressures on health services in the area which are already at capacity. The developers appear to have neither arranged a relevant HIA nor provided evidence of having appropriately liaised with GPs or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and so have not made provision for 1,500 or more new houses will make on a local NHS struggling to cope. The objective of WBC and the North-East Thatcham plan to improve access to the health service component of community infrastructure has not been met as they have not provided for a viable primary care medical facility. WBC failures in this aspect represent a fundamental flaw and any plans could be overturned if a comprehensive review is undertaken.

Schools in the local area are already at capacity yet there are no substantive proposals in the current plan for how this need for school places is met. There is an unspecific mention of a new secondary school but no indication of where it would be located. If the developer to fund such a school, the flawed report merely suggests a 50% contribution. WBC, as an education authority, has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years is not defined or even mentioned in the LPR unsound.

I have mentioned previously the issue of traffic and the NE Thatcham plans currently proposed include a new access to the site which is already coping with a far higher traffic flow than it can reasonably do so. The road is narrow and twisting and already at capacity. A new access on Harts Hill Road would create a significant accident risk.

The plans for NE Thatcham also include a vague mention of a "country park", with no indication of what that actually means. The open countryside, with relevant footpaths, there is no logical argument for a country park. This seems to have come from the lead developer A2Dominion, who show no understanding of the value and importance of unspoilt countryside.

WBC have also failed in their basic duty to check on the integrity of any developer. A brief look at the Facebook page for A2Dominion, which gives voice to owners and renters of A2Dominion properties, will quickly make anyone aware of the serious financial problems of A2Dominion responsibly and it is clear that they cannot be trusted to fulfil any commitments they promise.

The loss of such a large greenfield site, which is currently a significant amenity for local people cannot be overstated. The loss would be immense, not only on the wildlife and loss of habitat but also putting pressure on a wide surrounding area. If the plans were to proceed, they would mean perhaps 5000 people, 2500 cars being on developed land which is currently farmland. The Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability: 'The site is a greenfield site which will result in a negative impact on environmental sustainability which would need to be mitigated.' But there is no detail on what mitigation measures: the assumption is simply that they will somehow be found during the planning application process. This makes the proposals unsound.

[Below comments added in follow up email 01/03/2023 16:16]

Further to my submission below I have just been informed that Bucklebury Parish Council commissioned a Traffic Study by Yes Engineering. The conclusions are

- The trips rates used by WBC are unreliable and not robust.
- The trip distribution is unrealistic (all evidence suggests traffic will be diverted from the A4).
- The mitigation measures are improbable at best.
- The location of site means car-borne travel will dominate.
- Highway network in the vicinity of Thatcham Northeast is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic.
- Increase in traffic through Bucklebury will pose highway safety issues.

These conclusions are further evidence that WBCs plans are flawed and unsound

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Weedon, Libby
Consultee Full Name	Libby Weedon
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS422
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 07:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I have lived in Upper Bucklebury since [personal information redacted] and I object strongly to the proposed Local Plan (set out below) and that it will have an irreversible negative impact on quality of life.</p> <p>Transport</p> <p>Access to/from the development will be via the A4 which is already gridlocked at peak times with traffic backing up along the A4 to Reading or the M4/A34 will inevitably seek an alternative route up Harts Hill through Upper Bucklebury. Harts Hill has caused numerous accidents over the years and is especially dangerous in winter, even when gritted. The development through Upper Bucklebury and pose an increased risk to villagers walking their children to school in the morning or in the evening on no pavement along Burden's Heath, which cars will use to head towards Cold Ash and Junction 13 of the M4.</p> <p>Healthcare</p> <p>The healthcare proposals contain only wishful thinking with no detail and an absence of consultation with existing medical practices. There have been no Health Impact Assessment. NHS England has commissioned few new GP practices, so the burden will be placed on already overstretched. Bucklebury is fortunate to have a well-managed medical practice but it was stretched during the provision of repeat prescriptions and other services. An excess of potential new patients will have a severe negative impact on service to its current list.</p> <p>Environment</p> <p>The Plan will have a severe negative impact on the footpaths and woodland in the proximity of the development. With the development and is traversed by means of a narrow footpath, with few visitors encountered on each walk. The development will increase footfall, widen the path and change the character of the area. Bucklebury Common similarly has many narrow paths and the flora and fauna. The development will result in a significant increase in pollution – light, noise and emissions – all of which will have a negative impact on the environment.</p> <p>Strategic gap</p> <p>Upper Bucklebury retains its separate identity from Thatcham solely because of the green strategic gap north of the A4 and distinct boundary between the two urban areas. If the North East Thatcham development proceeds Upper Bucklebury will merge with Thatcham and will itself become North East Thatcham. The rural nature of Upper Bucklebury will be destroyed.</p> <p>Education</p> <p>The Thatcham NE Development Plan, funded by the developers, was based on West Berkshire District Council data and is therefore out of date. The same plan also notes that the proposed development is not sufficient on its own to meet Government guidelines state that secondary schools with less than 6FE are not sustainable. The developer funding the development, construction, and has no impact on the substantial running costs of the school. Much of the site is sloping and there is no sports field, unless it is close to the A4.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holland, David
Consultee Full Name	David Holland
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS447
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 09:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I object to the above proposed development for the following reasons.</p> <p>1 INFRASTRUCTURE The proposal is a gross overdevelopment in a town that has suffered too many large developments that have the ability to provide and maintain the associated infrastructures. The maintainance of our roads and paths is suffering due to my wife's mobility scooter dangerous to use. Rubbish piles up on our hedges and on our verges and it takes us too long to clear rates, having to carry out rubbish collection.</p> <p>Another large development of this size and density will add to an increasingly underfunded and undermanaged infrastructure.</p> <p>1 EDUCATION. Assuming an increase in the town population of at least 7500 of which 2000 could be of school age, the existing schools will be overwhelmed. There are proposals for new schools in the development, which will probably not be sufficient. A high number of required staff could ever be found. Therefore the development is untenable on this area alone.</p> <p>1 HEALTH The same arguments apply. There are already insufficient GP Practices and it is unthinkable what an increase in population will have. We already cannot get appointments or even prescriptions fulfilled due to pharmacies under staffed and unable to dispense medication from the Thatcham Medical Centre. However this requires queuing outside and as we are in our 80s it is difficult at any time let alone in winter conditions so requires many trips to Boots at the Newbury Retail Park. Not good for the elderly. Similarly it is already impossible to get NHS dental treatment in the town. We have the hospital at West Berks but it is noticeable how much more difficult over recent years it has become to park let alone get appointments. With 7500+ people have on general hospital appointments let alone A and E. Again the development is not sustainable.</p> <p>1 HIGHWAYS. A development of this magnitude could conservatively add eventually 5000 plus cars to an already congested area already difficult to get onto Floral Way at certain times. Most will use Harts Hill, as many now do, to cut through the town to avoid the heavily trafficked A4 which will make life for people living on that route unbearable. Parking, already difficult, and this will affect businesses in the town of Thatcham. It will also mean more unmaintained paths and roads becoming unusable. I suggest a walk along Harts Hill Road from Floral Way to London Road and Floral Way from Harts Hill to London Road. Rubbish piling up in the hedges. Whilst I appreciate the lack of social conscience by some of our residents is the problem, the actions of residents over a relatively short period of time will exacerbate this serious anti social problem.</p> <p>1 CONCLUSION This proposed development is overwhelming, impracticable, untenable and unwanted. It is my opinion that if it is ever in construction including major housing developments nationally, that promises made regarding highways schemes will never be met. Further more the housing density, supported by planning, ever increases which improves the density of housing. We are now required to find room an increasing number of refuse containers but the ever higher housing density demands more of dedicated areas per plot for the storage of these. A small point but this leads to an ever untidy and cramped environment. I once insisted on a certain number of parking places relating to bedrooms on a plot but is now happy for people to have more bedrooms resulting in more vehicles parking in roads and usually on paths making the use of mobility scooters a struggle. For up to 2500 houses, the equivalent to building Hungerford attached to Thatcham, is totally unacceptable and will further strain our already overstretched infrastructure and increased social pressures which will undoubtedly result in higher density housing. The mentioning the loss and damage to our delightful countryside and loss of much needed agricultural land will be a major and protracted building programme. There is also the undoubted pressures and disruption to existing businesses required to provide more home grown produce.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Griffiths-Eyton, David
Consultee Full Name	David Griffiths-Eyton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS460
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 11:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The LPR does not explain how the necessary educational requirements will be met. It is unsound because there is no what funding the required schools will be built. It states that a secondary school won't be viable but the proposal will schools to cope.</p> <p>The LPR is illegal and unsound because it does not provide the strategy documents to support its Sustainability Char how it will mitigate the ecological damage from building in a greenfield site.</p> <p>The plan is unsound because it doesn't explain how increased traffic on Harts Hill Road will be handled. It is already so totally unsuitable for walking, cycling or more cars.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Murray, Sharron
Consultee Full Name	Sharron Murray
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS499
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	28/02/2023 09:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am emailing my objection to the Thatcham NE Development. While I understand the need for more housing I cannot see how the development in Thatcham as the current infrastructure in Thatcham as is cannot provide and cope with this amount, new housing.</p> <p>If further development is to occur then the council will need to include in the planning: healthcare, a doctor's surgery, a GP surgery to be able to cope with demand as our current doctors are already struggling. Dentistry, as getting nhs dentist appointments. Schools. Primary schools need more funding and spaces to accommodate this further growth and not only that but the secondary school as Kenet and Trinity are both already very heavily/over subscribed. Drainage and sewerage also will be an issue in terms of the sewerage works which is struggling already with all the housing currently in Thatcham.</p> <p>For all these reasons I object to the development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Mumby, Emily
<p>Consultee Full Name</p>	Emily Mumby
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS518

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/02/2023 13:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<ol style="list-style-type: none"> 1 Traffic - the roads around upper bucklebury and other villages are narrow country lanes and cannot cope with to happen with the proposed increase in housing to the area. 2 Pressure on secondary schools - Kennet is over-subscribed. This development does not take into account road infrastructure in this regard. 3 Damage to the common - increased footfall as a result of the development. This is an important ecosystem wh

	<p>4 Environment - Greenfield development abutting an AONB. This has not been properly taken into account or protected and their habitats.</p> <p>5 Pressure on doctors surgeries - already over subscribed local surgeries cannot cope with further pressure.</p> <p>6 Lack of definition between Thatcham and Bucklebury - Upper Bucklebury will lose its identity as thatcham and</p> <p>7 The claimed 'reduction' in the number of houses to 1,500 is misleading. This should read 'increased' to 1,500 houses to 2039 rather than 2036.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Anderson, Kirsty
<p>Consultee Full Name</p>	Kirsty Anderson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS399
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	28/02/2023 11:53:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	

<p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>To West Berkshire Council,</p> <p>As a resident of Thatcham for 30 years, I'm writing to raise my concerns over the proposed development of NE Thatcham being built from Cox's Lane to almost Lawrence's Lane and spreading up the beautiful countryside to Upper Bucklebury building a town the size of Hungerford on the edge of our Town!</p> <p>There are so many reasons why this development is WRONG and SHOULD NOT be approved!</p> <p><u>Infrastructure</u></p> <p>Schools, Doctors, Chemists, shopping facilities, parking in the town, and sports facilities can't even cope at the moment, busy, especially in the mornings, you can queue down Floral Way to get to the A4 way past the Mill House now! Today's traffic conditions as we are still living from post covid effects where more people are working from home, as we return to be traveling into the office, increasing traffic congestion to a level that's unsustainable. Parking at the train station is full and the queue caused by the level crossing is currently too long, with new housing you won't even be able to reach the station! How are all these issues going to be resolved, I see no plans in place to help with any of these.</p> <p><u>Environmental</u></p> <p>We live in a place of outstanding natural beauty and we love where we live. Our family love walking our dog in the fields that are to be built. These footpaths are used by so many people and the views are outstanding, this will all be ruined by the new buildings. Beautiful walks are good for people's physical and mental health. There is so much wildlife that depends on this open space being destroyed and would have an adverse effect on the AONB which WBC is required to protect! Building these houses will cause Thatcham Flooding again, surely this must be a concern for the council. Other issues will be increased light, noise, and traffic.</p> <p>It has amazed us that WBC has broken its own processes by not inviting others to tender for developing the NE Thatcham. The developer basically write the plan. It is wrong on so many levels and leaves us feeling that WBC does not care about the community.</p>

	<p>in Newbury and Thatcham all our lives! Is money from developers more important?? We are also troubled that other available that may reduce WBC's reliance on Thatcham North East to achieve a workable Local Plan are not being o to see a report on Newbury Today claiming there are flaws in the Local Plan has been strangely been removed?? W</p> <p>If these plans go ahead, we will strongly consider moving from the area, for many years we have been Conservative vote to another party that is more interested in their residents than receiving money from developers!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Shearn, Sam
<p>Consultee Full Name</p>	Sam Shearn
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS425
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	01/03/2023 14:56:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I object to the Thatcham NE Development. The proposal is unsound in the following ways:</p> <ul style="list-style-type: none"> • There is no detail on healthcare provision for the occupants of the new houses. • There is an underestimation of the impact of traffic in Thatcham and surrounding villages particularly as there is • There is no evidence that it will have an positive impact on the environment as the plan claims. <p>The negative impact on me will be:</p> <ul style="list-style-type: none"> • Having grown up walking these fields and Bucklebury Common I do not believe the proposals will preserve the • with no adequate bus service in Upper Bucklebury I have to drive, and I believe the housing will add significant • My doctor's surgery at Chapel Row is already overstretched and there is no plan outlining where approximately <p>healthcare and so waiting times for appointments will continue to rise.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hope, Sam
Consultee Full Name	Sam Hope
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS650
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 20:44:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

* No	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Following the West Berkshire Council's publication of the Local Plan Review 2022-2039 Proposed Submission, I wish to object to all development sites noted under the Harts Hill Farm area(s) as I believe the plan to be unsound. Information is either that development is in breach of many policies outlined within the NPPF and WBC's own documentation. The proposed development will have a negative impact on the open countryside it will replace, the neighbouring AONB, ancient woodlands, and Bucklebury congested highway network and increase the risk of minor and fatal accidents in the process.</p> <p>I therefore object on the following items:</p> <p>Settlement Boundary</p> <p>Thattham Settlement Boundary follows Floral Way from the A4 north towards Lawrence Lane. Land to the north-east of the Settlement Boundary. West Berkshire Local Plan Review to 2036 – Regulation 18 Consultation, Policy 18 in the Countryside stated, “a presumption in favour of development and redevelopment within settlement boundaries and no development outside of settlement boundaries”.</p> <p>Local Plan Review 2020-2037 states that;</p> <ul style="list-style-type: none"> - Policy SP 1 “Opportunities will be taken to maintain and enhance the identity of Thattham separate to that of Newbury settlements.” - Policy SP 1 “The villages in the surrounding area will retain their existing role and separate identity, with settlement boundaries clearly defined and DC1 ensuring that physical separation is maintained.” - 5.42 “The separate and distinctive identity of these individual settlements helps to define communities and is an important feature of West Berkshire... Much of the pressure for development is around the edges of settlements, which can physically merge into one conurbation. An increase in activity which has an urbanising effect. Despite this, a key feature of even the larger settlements is the retention of breaks remain important for the continued retention of the existing settlement form, pattern and character.” <p>By extending the Settlement Boundary north towards Upper Bucklebury, the development will not only put undue pressure on the Ancient Woodland, but clearly contradict the council's statement made within the Regulation 18 Consultation document and numerous policies stated within the LPR. Any development north of Thattham will physically and geographically merge into one conurbation.</p> <p>The LPA's Housing Site Allocations – Newbury and Thattham Spatial Area, Table 2, Site Options Considered and Rejected. Hill states that the site was rejected based on “rural character, site separated from built form by Floral Way, potential for solar panel potential” and “overhead power lines”.</p> <p>As stated in Thattham Strategic Growth document instructed by the Local Authority provided by David Lock Associates, “development is affected by the surrounding relief. Apart from a small amount of development towards Henwick Park, the site remained in the valley bottom... The only submitted sites affected by relief constraints are located to the north of the site, to the north-east of Thattham”. Due to the site's topography, any proposed development will appear overbearing to existing buildings and Mews in both scale, mass, and bulk. Any development sited on higher ground would have direct views into existing buildings.</p> <p>The Strategic Growth document further mentions that the, “land at Harts Hill Farm... are closer to the AONB boundary than Thattham, and are more constrained for development in terms of topography, landscape sensitivity and ecology.”</p> <p>Thattham's Strategic Growth Study by David Lock Associates and Stantec for West Berkshire Council states that Thattham has previously received 2 major planning applications that were both, “refused ultimately for being outside of Local Plan settlement boundaries”. Both applications were further refused by the Secretary of State.</p> <p>I therefore believe that North East Thattham is of poor siting with regard to any proposed development, causing detriment to the importance of ancient woodland, Bucklebury Plateau and AONB, alongside the segregation from Thattham's built form. Any development to the north-east of Thattham will contradict the outlined policy noted above regarding separation between</p>

development will adversely amalgamate Thatcham, Bucklebury and Cold Ash. Were the LPA to amend the Settlement development areas, this amendment would solely be to facilitate the proposed development, undermining the intrinsic value of the area and its own policy.

Countryside, Greenfield and Brownfield Sites

Required under The Town and Country Planning (Brownfield Land Register) Regulations 2017, publicly available data from the Council Brownfield Land Register (Part 1)_2022 update states that, when published, there were 79 brownfield sites with a net dwelling total of 3,592 houses across a total of 59.87 hectares. Further, as published by MHCLG, West Berkshire Council has 1,000 empty homes. The NPPF also promotes the use of brownfield sites prior to any development within open countryside.

Thatcham's Strategic Growth Study for West Berkshire Council stated that, "Thatcham's attractiveness as a place to live is defined by the quality surrounding countryside". It goes on to state, "it is important to note that Thatcham has few examples of hills and the urban grain and pattern of the immediate surroundings is unlikely to achieve a positive result". The Strategic Growth Study was prepared and obtained by West Berkshire Council though it appears the proposed development's siting is a brazen contradiction of the above, either being ignored or disregarded by the WBC LPR.

Section 4.2 of the West Berkshire Local Plan Review 2022-2039 states, "The NPPF promotes the effective use of land, encourages higher densities in urban areas of high housing demand and refers to the need to release land for development".

The NPPF also states under paragraph 119 that planning policies should promote an effective use of land, "while safeguarding the environment". Under paragraph 120 the NPPF states that policies should, "give substantial weight to the value of using land for settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded or unstable land".

The North East Thatcham development site is outside the settlement boundary, rural, within open countryside and is therefore disagree that the site could ever follow the existing grain of Thatcham built form, does not promote effective use of land or improve the environment.

Although the LPR mentions it will mitigate against any environmental impact, most Local Authorities do not have sufficient resources to protect the biodiversity of an already thriving natural habitat, one that benefits from mature hedgerows, ancient woodlands, ponds, streams to name but a few, I'd argue that the development would never be able to meet any biodiversity net gain target.

Further, the proposed site makes no attempt to utilise the Local Authority's existing empty and brownfield stock which is in excess of the numbers proposed within the WBC LPR and already have infrastructure. More appropriate sites are therefore available.

The Masterplan Concept also failed to depict the location of an existing Public Right of Way, walked frequently by Thatcham residents. A footpath may be redirected under a Public Path Diversion Order governed by requirements set out in Section 119 of the Planning Act 2008 that any built form or diversion of this public footpath would be detrimental to public enjoyment, distance and views.

Transport

The A4 is a major road connection between Reading and Newbury, with connections to the M4 at J12 and J13 respectively. According to the 2011 Census, Thatcham Strategic Growth Study, Stage 1 Report, Table 8 stated that 79% of people travelling to Thatcham use a car, with large delivery lorries frequently travelling to and from Harrods and Forterra development on the Estate. This, in addition to through traffic means that the A4 is an extremely busy highway.

West Berkshire Council's Local Plan Review Transport Assessment Report Phase 1, Table 5.3 outlined traffic forecasts for the site close to the new development. An assumption can only be made that the data was obtained around the time that the report was prepared, COVID pandemic, as the information disclosed is a misrepresentation of reality. The forecast and scenario table with the report provides a disingenuous representation of pre-COVID congestion issues in addition to the table being void of eastbound traffic on Floral Way and Bath Road – Floral Way. During peak times, vehicles along Floral Way attempting to travel east bound on the A4 are delayed for far greater than 50+ seconds, with instances of congestion, not caused by accidents, exceeding 15-minute delays at the site road roundabout. The development will link to Floral Way and the A4, roads that are already exceeding capacity.

The Highway Strategy states that traffic will be directed towards the A4, relieving the 'rat run' of traffic through Cold Ash. Historically during high congestion, Harts Hill road becomes the main thoroughfare for many vehicles avoiding the A4. The development locates an exit at the north of the site leading directly onto Harts Hill road. The Transport Assessment for the northern end of the NET site proposes new priority junctions on both Floral Way and Harts Hill road... Results of the assessment state "these will not cause problems". However, the document has no modelling results for this junction. Due to Harts Hill Road being a highway, with high embankments and hedgerows, it is a fast and already dangerous road, especially for cyclists and pedestrians. An increase in traffic onto Harts Hill road will not only directly affect the existing residents in The Spinney and Farmhouse in Upper Bucklebury due to heightened numbers of commuters using the network of rural roads as a thoroughfare. The road for young families such as myself, as a dangerous, over congested road will become even more dangerous.

Statista Data 2017/18 states that on average there are 1.4 cars per household, therefore a development of 2,500 homes would result in an increase of circa. 3,500 cars on an already overloaded local road network. Where West Berkshire's Parking Standards are applied, the number of cars would be greatly over the estimated figure of 3,500 cars noted above.

The Strategic Environmental Assessment (SEA) notes under SA Objective 4 that any development should, "promote and encourage all forms of safe and sustainable travel". Thatcham Strategic Growth Study also indicated that, "walking, cycling and other active modes of transport are natural choices for getting around", though this contradicts Stage 1 Report Table 8, noted above; reports also show that walking and cycling are not the primary modes of transport in West Berkshire therefore the statement is not accurate. Noted within West Berkshire Council's Local Plan Review 2022-2039, "The area has significant employment provision and Newbury provides many of the major services, including retail and leisure facilities. Movement between the two towns and transport linkages, by rail and road are vital." This further contradicts the Strategic Environmental Assessment, although the Colthrop Industrial Estate will be within walking distance of any proposed development, the 'thriving' employment with the majority of any new development commuting to a place of work, typically and as stated in the SEA.

To improve the safety of the roads, additional traffic lights will need to be introduced of safe means of crossing. This will result in further congestion on the roads, especially during work commuting, school drop off and pick up times.

The Thatcham train line is a major connection between Newbury and Reading, towards the south-west and London. The line is frequently used for freight trains, and with only a level crossing this is already a major cause for congestion through the area. The location of the Thatcham train line is a major connection between Newbury and Reading, towards the south-west and London.

also frequently used for freight trains, and with only a level crossing this is already a major cause for congestion through the location to introduce a bridge at Thatcham station therefore an excessive increase in vehicles will only further antagonise the situation. The proposal also identified a new bus route to run immediately behind the properties of Farmhouse Mews. The garage was designed and covenanted to be a sympathetic transition between residential built form and agricultural land beyond, and the benefit from post and rail low level fences. Were a new road and bus route proposed, all privacy and security to the garage would be significantly compromised. This covenant also highlights the Local Authority's previous understanding of the setting, and thus the proposed development is a further contradiction to their reasoning and views.

Flooding

Tributaries to the River Kennet, flowing south through Thatcham, have historically increased surface water run-off to the river banks to burst, flooding extensive areas of residential and agricultural land to both the north and south of the river. Surface Water map B2 drafted from 2018 data, denotes localised 1 in 30 year flooding along all tributary streams, especially those of Farmhouse Mews and The Spinney. Although measures have been implemented by means of the Flood Prevention Scheme to Dunston Park, existing agricultural land between Floral Way and Park Farm are periodically water-logged.

The properties along Farmhouse Mews that border the fields to the north, <personal details removed>, were constructed with a field boundary to try and prevent run-off from the fields entering the curtilage. Gardens however frequently become soggy, showing signs of significant water retention.

Although any new development would benefit from Sustainable Drainage Systems (SuDS), these systems only lower the risk of water storage or diverting to lower risk areas. Where partial percolation of surface water delays the immediate impact of periods of rainfall will overwhelm the systems. Drainage systems must either discharge into local waterways or into the ground, causing flash floods to happen more frequently, systems will not be able to discharge due to waterways being at full capacity (caused by prolonged rainfall), ultimately causing flooding.

There is no mention within the LPR or publicly available evidence to support that the previously implemented flood prevention measures at Farmhouse Mews would have the capacity to cope with the increased number of houses and surface water. Thames Water have indicated they cannot accommodate the increase in both surface water and foul drainage.

The LPR notes under 5.27 that green roofs and permeable surfaces should be used though in principle, neither are they always effective. Seldom is the case that 'permeable paving' is porous itself, rather the joints are left permeable therefore the surface is still impermeable.

An extensive increase in hardstanding generated by any new development, the discharge of surface water will only increase the volume, putting the properties along the northern boundary of Floral Way at severe risk of flooding. Flood History data for the area within the Thatcham area had internal flooding, source of which was surface water.

Education

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR, in breach of the Council's obligations to provide education facilities for children. This lacking of information causes further congestion of vehicles and traffic on the highways, with a fair assumption being that many households will have to commute to schools already in existence having insufficient capacity to cope with the huge spike in population.

There are no details within the LPR of any provisions for Nursery or Early Years education. Nursery places are seldomly accepting new attendees favouring full time children over that of part time due to high demand. A new development at Farmhouse Mews has already stretched educational system to breaking point. As the LPR does not outline how these measures will be mitigated, that they won't, leaving parents with the dilemma of work or care. No nursery and school spaces for children will ultimately be created, especially single parents, turning to benefits to mitigate the situation.

The provision for Primary school and Secondary school education is also unclear and contradictory. Developer contentions within the LPR, £12M for Primary and £15M for Secondary, though no recent data has been referenced to justify these figures. Farmhouse Mews being landlocked within a residential estate, it has no ability to further expand. 4.83 notes, "The study has not engaged in a prediction and modelling exercise to determine future primary and early years educational demand across the town, or the long-term capacities of existing schools". The LPR therefore sets no locations for any school, no timing for funding, no indication if the funding is suffice for the requirements, no parameters as to what the schools must abide; fundamentally West Berkshire Council have not evidenced their obligation as an educational authority how arrangements for suitable schooling provisions will be made.

"Fulfilling Community Objectives"

The Thatcham Strategic Growth Study Phase 3 report by David Lock Associates stated within its Summary of Findings that the new development in north-east Thatcham has been developed building on principles established at a community representation stage. These representatives are and what their links are to the area, it is hard to believe such a large-scale development is being undertaken. The Thatcham Town Council Liberal Democrat representative, Cllr David Lister, is strongly against the development as many within the Thatcham community are also strongly against it. Residents have started to voice their objections. The development's consultation period was launched just before Christmas 2019 but was short, therefore many residents were unaware of the consultation or the development itself taking place. With such a short time period, it allowed little time to review the documentation drafted and respond with any objections prior to the consultation period. Residents were not given adequate time to respond to the proposal and object accordingly, therefore it is imagined that any representation of the thoughts of the residents.

Size, Density and Tenure

Stated within the Local Plan Review 2020 -2037 under Policy SP18, "residential development will contribute to the delivery of a mix of dwelling tenures, types and sizes to meet the existing and future housing needs". Also stated within the LPR under Policy SP18 Table 3, the size in highest demand for market value properties is 2-bedroom at 40-45%, with affordable housing also in high demand at 35-40%. The plan also mentions that there should be a broad mix of future dwelling sizes for both market and affordable housing. It is seldom the case with recent developments within the local area. Reed Gardens in Woolhampton for example has delivered affordable houses, though only 2 of those properties being 2-bedroom, the highest in demand, with the remainder being 3-bedroom. Additionally, recent developments within Settlement Boundary could have increased density without negative impact on the environment. As such, had recent developments delivered properties of a size to meet those highest in demand, and/or provided a mix appropriate for its location within Settlement Boundary, the requirement for new housing may be fewer than the 1,500 units.

	<p>The 2011 ONS Census states that there were 10,241 dwellings in Thatcham. The number of new units proposed at the site would mean an increase to Thatcham of nearly 25%, an excessive number that neither the infrastructure or surrounding roads can support. Tull Way for example consists of only 75 properties however exceptionally low density when compared to the site's area.</p> <p>I, along with many other residents of Thatcham object to the extent of the North East Thatcham Development, specifically Hill Road and Harts Hill Farm area. Resulting from a huge increase in traffic numbers I worry for the safety of children. This further increases the number of cars on the roads, increasing traffic, pollution, noise, and accidents. A development in this area would destroy ancient woodland and open countryside regardless of mitigations.</p> <p>I therefore hope that West Berkshire Council reconsider the proposed Housing Site Allocations and look to locate them in an appropriate, brownfield or within Settlement Boundary area, not within open countryside.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Wauchope, Francis
<p>Consultee Full Name</p>	Francis Wauchope
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS446
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	28/02/2023 15:15:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>As a local resident, likely to be very severely affected, I strongly OBJECT to this plan on the following grounds:</p> <ol style="list-style-type: none"> 1. Principle - were permission to be granted the number of dwellings proposed will lead to an intolerable burden on the area. There have been a number of infill developments to the north of Thatcham over the years, as well as to many other villages including Hampstead Norreys etc. Where will this all end? As a general principle it would be better to redevelop former industrial areas within the current boundaries. The proposed site is also on the edge of an AONB and close to various SSIs - again highly questionable. 2. Roads - many of the current roads in the area are either very narrow or very restricted B roads - and are already carrying an intended volume. (A4, Cold Ash, Pang Valley etc) This will place new burdens of danger and emissions on the existing roads. 3. Environment - it is undoubtedly the case that the development will completely destroy greenfield sites and their associated biodiversity. There is no proper mitigation plan, nor any proper offset plan. The plan is flawed in every way in this area and offers no net benefit. Given the inevitable road traffic volumes there seems to be only cursory lip service paid to increased CO2 emissions. The development for development is an attractive one and should not be carved up. Period. 4. Services - this development and the pressure on the provision of services in the area. Most notably schools, surgeries, hospitals etc. How will this increased population already paying the price of the extra homes built near Thatcham and Newbury over the past 15 years that haven't had the benefit of will exacerbate the parlous roads capacity in the valley (see above). 5. Precedent - if this is approved where next? Expect the next swathe of construction. Conclusion This plan is not fit for purpose. Too many houses are proposed, in the wrong places, causing damage, with too little support. <p>Given the current demand for new housing a more profitable approach in every way would be the redevelopment of the area. There are a number of well managed examples in the area - specifically along the A4 and along the railway line to Reading. This plan will cause irreparable damage and fundamentally wreck West Berkshires remaining rural areas and the lives of those who live there.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thornycroft, Barry
Consultee Full Name	Barry Thornycroft
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS472
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 12:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<ol style="list-style-type: none"> 1 Kennet School is already over subscribed and local NHS doctor and dentist provision already past capacity. Unlike provision, a Primary School and Dr and Dentist provision is built BEFORE the houses go up, the local provision of 2 Concern of increased traffic on Harts Hill Road. I travel to Winchester regularly and its increasingly difficult to get noticed that more cars are using Dunston Park south as a 'rat run' to avoid the snarl up at the Sony roundabout waiting to happen as children living in Dunston Park walk to attend the Kennet School. With cars parked on verges risk is potentially high. One only needs to look at Cold Ash Hill which is now more or less joined to Thatcham at the bottom of the hill by The Regency Hotel. Traffic taking children to St. Mary's and/or to St. Finian's, the Pre-school traffic cutting through the village to get onto the motorway by avoiding Newbury, make this a strong reason NOT to build Hill as unlike Cold Ash Hill which is straight, Harts Hill is very windy and often I meet oil delivery lorries, refuse causing dangerous conditions. 3 With access to the proposed new estate on Harts Hill, more and more traffic will use the back road through Up and thus the M4 with all the potential extra traffic and risks that entails.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Morrison, Alex
Consultee Full Name	Mr Alex Morrison
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS544
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 16:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>1. The written ministerial statement by Michael Gove (6th December 2022) indicates that the housing numbers are not justified. The Inspectorate should no longer override sensible local decision-making, which is sensitive to and reflects local constraints. It is not clear if any of this development is needed at all?</p> <p>I would therefore urge refusal.</p> <p>2. I am objecting to the plan as so much of it is seriously unsound and it would have a massively detrimental effect on the health services and extra stress on bucklebury common are just a few of the things that would affect the area.</p> <ol style="list-style-type: none"> 1. The document talks about how the environment, both human and natural, will be improved or if not improved through the actions taken by the developers. The plan shows no evidence of any surveys to provide baseline conditions or indicators to explain exactly how the environment would be improved and what they would do to "mitigate" any destruction. This makes this important section of the plan unsound. 4. Building a major Greenfield development in the north Wessex downs AONB will forever affect the enjoyment of the area for local communities. There will be a detrimental impact to legally protected wildlife known to be present on the site, not to mention the use of existing areas such as Bucklebury common. This again shows that the plan is unsound in its analysis, reasoning and conclusions. 5. I understand that before any development of this size is undertaken, there should be sufficient capacity in the sewerage system to handle the waste produced. I have seen no mention of analysis or funding for the expansion of the sewerage system to be completed before any building starts, surely that is another reason why the plan is unsound. With the current sewerage system no additional housing should be built. 6. The plan is unsound where traffic considerations are concerned. There is no plan or funding for a bridge over the river. There are plans for exits from the estate onto a number of roads including Harts hill. This will produce a large increase in traffic on cold ash and Upper Bucklebury. There are comments in the plan that "modelling suggests" that all this will not be modelled. It shows no modelling detail or results. 7. There is no mention in the plan of building low energy, sustainable houses. Simply that the 2500 houses have to be built. There is no indication as to exactly what the design of the housing would be. Surely any council, in this current climate, should be making a massive change to the environment in the Thatcham area and as such, I feel that this makes the plan unsound. 8. The development is so far away from Thatcham station and Thatcham town centre that cars will be necessary. This is not promoted in the section on safe and sustainable transport and the strategic environmental assessment which accompanies the plan. It does not promote and maximise opportunities for all forms of safe and sustainable transport". With probably 1500 extra cars this does not comply with the safe and sustainable transport objective. Another example of an unsound part of the plan. 9. As a local resident for over 40 years, I feel that the building of 1500 houses so close to Upper Bucklebury will have a detrimental and forever for me, my household and anyone living in this very special area. 10. There is no health impact assessment in accordance with guidelines from public health England, and no objective assessment of the need for surgeries. This makes the plan unsound and would also mean that none of the possible 1500 + residents would have access to a surgery available from the three local over-subscribed surgeries. 11. The plan for secondary school provision is unsound with no timing or funding, no analysis of possible pupil numbers and no location of any school. 12. This is still essentially a plan for 2500 houses. The developers have simply reduced the headline numbers for the development the same. It would then be a comparatively easy matter to build the other 1000 houses in the future. There is no concession at all. <p>I hope I have shown in the above examples that this unsound plan should be rejected. The West Berkshire housing strategy is based on recent government figures of housing requirement and this will probably show that there is no need for more housing at all.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stephenson, Deana
Consultee Full Name	Mrs Deana Stephenson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS549
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 22:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to object on the above substantial and inappropriate oversized development of this area and set out my reasons below.</p> <p>The application provides no evidence or modelling of the impact this development will have on the local highways infrastructure. The Assessment report dated July 2021, but this report shows no modelling results with regard to increased road usage and congestion in all directions and specifically the roads through Thatcham, Cold Ash, Upper Bucklebury, Harts Hill road and the A33. There are no details in this area are minor roads (without footpaths) and would not be able to cope with the increased traffic demand and potential for accidents. The plan includes a car park on Harts Hill Road why is this necessary?</p> <p>There has been no Health Impact Assessment document produced. The local health authorities have to be brought in to deal with large scale development and increased population. This development increases and impacts the provision of health services. The application must show how such provision will be provided and by whom it will be provided. There are too few GP surgeries in RBH as the nearest hospital how will it cope with future demand in the area, the likelihood of new surgeries or a new hospital?</p> <p>Education provision for all stages of education has not been clearly defined in the Local Plan Review. What data does the Council agree on such matters if there is no planning for it? Provision for Education is a priority before any development. There are no details about location of land or how much the developer is prepared to contribute to building new schools. This all leads to congestion again no modelling.</p> <p>This development abuts the area of ANOB an area recognised as an exceptional landscape whose distinctive character is being safeguarded in the national interest. There are no significant reports attached to this plan devoted to what impact this development will have on wildlife, flora and fauna. The local LPR Sustainability Appraisal accepts this will have a negative impact on sustainable development. Has any thought been given to the impact on the common and village of Upper Bucklebury as people investigate green spaces?</p> <p>Where is there provision to build new facilities for providing water and drainage. Will our rivers run dry or be polluted and how do we cope with the extra capacity required.</p> <p>This proposal is so full of holes it should never have been placed before the Council to start with.</p> <p>This plan apparently is meant to enhance and benefit the local area. I see no such benefit to this development as it will require health provisions, education and services all which have a detrimental impact on the local community with neither new schools, dentist, chemists, food shops, facilities or roads being included. This will set a precedent for further development along the A33 linking Thatcham to Theale and every village in between.</p>

	The general overall picture for development does not take into account the existing developments in the area and has site(s) that could be better suited for development rather than green field sites.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dibble, James and Claire
Consultee Full Name	James and Claire Dibble
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS503
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 10:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object to the notion of building 1500-2500 houses in NE Thatcham which is in the final phase of West Berks.</p> <p>I can understand the pressure on the council to provide new homes in the locality but there are numerous reasons that the press and by parish council as to why concentrating this many houses in a single area will detrimentally affect the ways.</p> <p>We have no confidence that the outcomes from this proposed development of increased strain on local services for doctors and secondary schools, care homes etc have been properly considered.</p> <p>In addition the increased traffic this will create with the new home owners short-cutting through local villages along dropped-verged single track roads not only changing the physical state of these villages but also the mental health of the inhabitants. There is also the well documented change this will make to local pasture, woodland etc and the negative consequences.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>On the subject of transport and the rising awareness of the climate emergency, we are being persuaded to get out of the area. Would it not make more sense to keep developments small say 50 to 100 houses but look at where these can be near the station? Also more brown-field sites and the switch to residential of more and more office spaces as they become redundant should be considered.</p>

	As said, I do appreciate more homes need to be built but more, smaller developments spread across West Berkshire on exiting public services than one huge development with a rapid influx of say 4000 new residents.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Barry, Elizabeth
Consultee Full Name	Elizabeth Barry
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS502
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 10:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to this proposal on the following grounds:</p> <p>There seems to be inadequate provision for schooling for early years, primary and secondary education. The transport establishments is already inadequate as there is no bus service and parents are currently having to source and fund their own transport. There is no bus service from the villages north of this proposed development which means there will be increased car use. The hill is a dangerous road, winding, narrow without any footpaths and has witnessed many accidents over the years.</p> <p>There is inadequate provision for increased demand for medical services. The impact of increased traffic on the local area and outstanding natural beauty will be damaging to the environment.</p> <p>This development will increase the traffic flow through the villages north of the development, upper Bucklebury, Chipping Winton which already have problems with heavy and speeding traffic. Traffic calming measures would have to be introduced.</p> <p>I hope these issues will be taken into serious consideration when considering this application and that a decision will be made in favour of the applicant.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ford, Janet
Consultee Full Name	Janet Ford
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS352
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 15:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I object to the plan to build 1500 - 2500 houses in NE Thatcham</p> <p>The plan to build so many houses will have a huge impact on Thatcham and the surrounding villages that will unbalance what has already seen a great many houses built in the last few years. In my opinion a better way to comply with the increase in housing is to have smaller developments around the villages and towns so that specific houses can be built to suit the needs of the local area and the impact.</p> <p>The increase in traffic will be detrimental to the environment and I have concerns about the safety of more traffic on the roads around Harts Hill that leads off from the planned development.</p> <p>There is already a great deal of traffic around the railway level crossing in Thatcham, increase in cars will cause more congestion and impact on healthcare provision, education provision and dental care is already at struggling full capacity. The current plans for the new water pump do not seem to show full liaison with providers or make provision that coincides with the increase in housing plans. It seems to be done with the stages of building plans.</p> <p>Flooding has been an issue in the past how will the building of more houses impact that problem? The plans for flood defence do not allow for further expansion.</p> <p>In our village there have been problems for many years concerning cuts in water supply will that be effected by the plans for the new water pump?</p> <p>We are surrounded by an area of AONB how will wildlife and the environment be affected by thousands of more people moving into the area and activities?</p> <p>It seems to me that the plans that have been put forward lack full liaison and future planning with health and education and do not have full unbiased assessments of the impact of the increase in traffic and the impact the plans will have on the environment.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gatenby, David
Consultee Full Name	Mr David Gatenby
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS325
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 09:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan relating to the Thatcham NE Development as I believe that there are components of this plan that are as follows.</p> <p>INCREASED TRAFFIC The plan will result in a significant increase in traffic through Bucklebury and the surrounding villages. The plan includes a new road onto Harts Hill. This traffic will go towards Upper Bucklebury, splitting either towards Cold Ash or through Upper Bucklebury. Many of the roads in these areas lack pavements and are used by numerous pedestrians, dog walkers, cyclists and horse riders. This will result in a significant increase in traffic thus increasing the potential for serious accidents.</p> <p>SAFE AND SUSTAINABLE TRANSPORT I understand that the WBC state the policy is likely to have a positive impact on road safety as safe travel will be encouraged. This will result in an increase in opportunities for walking and cycling.</p> <p>However, the aforementioned significant increase in traffic in the Upper Bucklebury area will clearly increase the risk of accidents on these roads. These are roads that our family use regularly for these pursuits, many without pavements. This will certainly reduce the safety of our local roads for these activities. How the WBC can state this will have a significant positive impact in this area is beyond me.</p> <p>HEALTHCARE I am concerned about the impact +1500 homes in this area will have on our already overloaded healthcare services. This will result in significantly increased waiting times at our local surgery for Doctors appointments, blood tests etc.</p> <p>I understand that WBC and the developers are proposing a new healthcare site to be built for this area. However, the WBC has not provided a purpose Healthcare Impact Assessment, nor provided evidence of having liaised appropriately with local healthcare providers.</p> <p>In essence, the objective of WBC and the developers to improve access to the health service component of the community is not being met as they have failed to provide evidence for the provision of the required primary care medical facility. The impact of this is significant.</p> <p>ENVIRONMENT I have major concerns regarding the impact that building so many new houses in this small area of countryside will have on the environment. I understand that the Bucklebury Parish Council have reviewed the background documentation provided by the WBC and the BPC has concluded that there is no evidence to support claims that SP17 will have a positive impact on the environment. It will have a significantly negative impact.</p> <p>We live in a beautiful area. I am concerned that the impact of the proposed 1500 houses (potentially 2500 houses in total) will have on the issues to our environment with potential collateral damage to Bucklebury Common due to significantly increased footfall and the loss of legally protected wildlife.</p> <p>The LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability. This impact is to be mitigated, no details have been provided regarding how this would be carried out.</p> <p>It is obvious that the policy is to build as many houses as possible in a small area of countryside, on a cost effective basis. There is no regard regarding mitigation of the impact on the local environment.</p> <p>INACCESSIBILITY OF DOCUMENTS The volume and complexity of documentation that one is expected to review when considering points to raise is overwhelming for any person to deal with. Having spoken to numerous people in our community, many of them have stated that it is too complex to read. Consequently, they won't be taking part in this process.</p> <p>A true consultation should involve two way communication open to everyone. In my opinion, the WBC is failing in its duty to consult on this. One wonders if this is deliberate in order to reduce the number of objections to this Proposal?</p> <p>In conclusion, I object to the proposed Thatcham NE Development for the aforementioned reasons. I believe that the proposed 1500 houses in an area of countryside that is not suitable, resulting in a significantly adverse impact on the local community and the quality of our lives.</p> <p>The plan has various flaws, ambiguities and is full of unsubstantiated policies. Consequently it should be rejected.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hannam, Rebecca
Consultee Full Name	Ms Rebecca Hannam
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS333
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:37:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to put forward my objections to the proposal to build 1500-2500 houses in NE Thatcham in the Regulation</p> <p>My main concerns include the following:</p> <p>Bucklebury common is a beautiful, unique space. I walk my dog every day in Upper Bucklebury and the increase in having a negative impact on the area. The negative impact of 1500 to 2500 to the Bucklebury Plateau Biodiversity O woodlands, heath and in particular the common is unimaginable. There will be detrimental impacts to legally protect the area and the siting of a major greenfield development in the North Wessex Downs AONB that will forever be cha countryside to built up suburbia. Everyone needs greenspace but the estimated number of 4,000 people can not be for two 'country parks'. Even this has been downgraded to undefined 'community parks' which shows little commitment environment. This will cause the inevitable overspill of people visiting adjacent areas.</p> <p>Already our village roads are struggling with traffic. The extra traffic that will be funnelled to Cold Ash and Upper Buck Harts Hill will cause serious potential of accidents due to the narrow roads and no pavements. The Sustainability Ap Assessment has an objective of 'To promote and maximise opportunities for all forms of safe and sustainable transp was given as 'To reduce Accidents and Improve Safety' The council assessments of 'The policy is likely to have a P safe travel will be critical to the design of the site'. The other objective being 'To increase opportunities for walking, cy The Council Assessment of 'Significant Positive Impact'. How can this be? Already I have stopped cycling on the lo traffic, and pot holes. There are few pavements for walking and the public transport is virtually non-existent!!</p> <p>The three doctor surgeries that cover the proposed area are already overstretched. In my experience, it is not poss appointment at Chapel Row for at least 3-4 weeks from the time of phoning. There appears to be no Health Impact A specific to the proposal of the North East development. There appears to be no evidence of WBC or the developers health care agencies or providers. There has not been evidence for the provision of a viable primary care medical fa</p> <p>With regard to Educational needs for the development, it appears there are no details in the LPR for Nursery or early school education is unclear and contradictory. There is no recent data available so it is not possible to assess if the sufficient. The plan for secondary school provision is also unsound. There is no evidence of the number of pupils the of a school is not clear. The number of Form Entries is not defined but it is noted that anything less than 6FE schoo not clear and there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide suitable school provision is not defined or evidenced in the LPR.</p> <p>There is so much that makes this LPR unsound. I believe that the council should pause the plan making to bring forv updated planning guidance when this comes in later in 2023.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hannam, Simon
Consultee Full Name	Mr Simon Hannam
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS380
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	26/02/2023 10:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Objection and request an Inspector looks at the as the LPR planned development for Thatcham North East for 1,500 SP17 suggests the proposal will likely have a positive impact on sustainability which I call in to question how.</p> <p>The appraisals Below are my objections.</p> <p>My objections are</p> <ol style="list-style-type: none"> 1. Traffic and Transport. The proposal states it wishes to divert traffic to the wider rural roads. Clearly you need to vis destroyed by wider commercial vehicles. Surely the preservation of rural highways for all who have their rights to use car and lorry use will ultimately lead to serious damage to wildlife and human life. How can increased traffic be comp pedestrians, horses, cyclists. As a user of two of these modes of transport the risk of bodily damage will be increased to take responsibility? The risk of additional accidents and reduced safety has not been suitably considered. I invite to walk Harts Hill Road to fully understand the dynamics which will be impacted. 2. The recent food shortages and the global transportation of food has not been considered in this plan. The south fa leads the site to be ideal for food production. Global food production and the environmental impact of large transportatio in when there are other brown field sites already available where the soil for agricultural purposes has already been in this land is lost for food production it can never be returned. This is incredibly short sighted of the council to consider when alternatives exist. 3. West Berkshire has jewel in its crown- Bucklebury Common (AONB) and the council should be preserving the habita Are the council aware that Night Jars can be seen and heard on the common and this is only one species that will lik additional users of the common. Subsequently the Nightjar is protected under Annex 1 of the EU 'Birds' Directive (Dir birds79/409/EEC). The loss of such rare birds should be a major concern and hence think a large scale housing dev 4,000-6,000 people will put these and other species at risk. These birds and other species are under huge pressure protecting. Building houses permanently change the world and what a legacy for the council to have on their consci 4. Community identification exists due to a 'strategic gap' or a 'rural landscape', identifying a boundary. Where infilling oc of additional houses it degrades society from its individuality in to an homogenous society. This lacks diversity and a which has been created over centuries and should be preserved. Leaving communities unlinked maintains their integ having their own identity. 5. Thatcham train station is likely to be the destination for many commuters for work and leisure. The distance would walk and building nearer to a major hub like a train station should be a West Berks priority. There has been mention of and please consider the larger picture on how vehicles are fuelled. Electric vehicles need battery storage currently th global impact of lithium has major concerns so building as near as possible to rail transport links should be a priority if a person has to use their own transport to travel 1-2 miles then they will ignore public transport like a railway. Anoth rail users park at the station without major transport issues which already exist at Thatcham station. <p>As stakeholders of the regional environment and human well being we need West Berks to have a far better long ter green field sites. The long term consequences will be viewed in the future as very poor decision making by the curre</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Allison, Roger
Consultee Full Name	Roger Allison
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS488
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to the proposed Thatcham NE Development for the following reasons:</p> <ul style="list-style-type: none"> • Loss of a substantial piece of prime "green belt" land which currently separates Thatcham from the village of Upper Clatford, potential impact on the local wildlife, environment and ecosystem. • Concerns regarding the impact on already stretched water supply capabilities. Thames Water themselves have consulted stating that "Substantial water shortages face the whole of the South East of England". • The area of the development currently offers the capability to buffer heavy rainfall. Rainwater run-off already causes flooding in the Kennet Valley area, and if this development goes ahead this problem will only get worse! • Once the development is completed there will be a large rise in vehicle movements on the A4, Floral Way, Hartley Way, as most home occupants have one or more vehicles. These extra vehicle movements will create additional environmental impacts. • There are no clear provisions in the plans for additional health centres, dental practices, or schools in the locality of the development. The local current services and schools are already heavily used and will not be able to easily cope with the increase in demand from the development. • The proposed development will increase my driving journey time along the A4 towards Newbury from the East of Thatcham. Extra vehicles that will be exiting and entering the Development. These extra vehicles will be creating additional environmental impacts. • I believe that West Berkshire Council Planners should look at brown field sites wherever possible rather than u... developments such as this. <p>Please take these comments into your deliberations relating to this proposed Thatcham NE Development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<ul style="list-style-type: none"> • I believe that West Berkshire Council Planners should look at brown field sites wherever possible rather than u... developments such as this.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Edwards-Moss, David
Consultee Full Name	Dr David Edwards-Moss
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS463
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>On 6th December 2022 Mr Michael Gove Secretary of State for Levelling up, Housing & Communities suggested housing as advisory and not mandatory as previously directed.</p> <p>I also consider further large scale housing developments in the South East of UK wont assist the “levelling up” for the area. West Berkshire has had a massive increase in population over the past 50 years and one the last big developments at Dunstan Park has added more services in the area. The Two practices in Thatcham closed their new patient registrations and this meant that Chapel Down took in a lot more patients from Thatcham itself.</p> <p>Thankfully we had a new surgery built in 1992 but in 2004 a new extension with 4 more consulting rooms was added. We had added shortly after. We also took on another GP to cover the increasing population.</p> <p>In the plan I note there is provision for a new primary care centre, but nationally the NHS is around 40,000 nurses, a far below the recommended staffing level. I also believe that there is already a shortage of GPs in West Berkshire and so recruitment is increasingly difficult.</p> <p>I note all the proposed routes for walkers/cyclists, and as a regular cyclist myself, I am pleased to see the plans in this regard.</p> <p>However the main vehicle routes for north south from Thatcham, apart from congesting the A4 at the Robin hood Roundabout are totally inadequate.</p> <p>Going south, without going on A4 to Newbury, past Thatcham train station has been a bottle neck for years. Going north again without going to the A4 in Newbury means vehicles travel up through Cold Ash where due to “traffic calming” measures there is a grid lock at busy times.</p> <p>Finally I am concerned about the loss of habitat to wildlife and for example I often cycle up the bridleway near Colthrop where the sky larks is one of the few places I can enjoy listening to these precious birds.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The	

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burke, Noreen
Consultee Full Name	Noreen Burke
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS471
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 12:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I wish to formally object to this planning application on the basis that the surrounding infrastructure, amenities and facilities are stretched to capacity due to huge development. Having lived in the area 15 years and worked in the health sector locally for the last 12 it is just a matter of time before the local services and surgeries are over stretched, don't suggest building a GP practice, there isn't the GP's available to staff it! Just look at the current situation in the next few years.</p> <p>Dental surgeries locally unable to take on new NHS patients, not enough dentists.</p> <p>Schools over stretched.</p> <p>Traffic levels in and around Newbury already at pre-bypass levels.</p> <p>Queues of traffic at busy times A4 and level crossing.</p> <p>Local grassroots football clubs already struggle to find space to train and play matches, how many extra kids do you think can be accommodated in the area?</p> <p>This is a very inappropriate planning application with no thought for the landscape. The area between Thatcham and Newbury is a beautiful space.</p> <p>The list of objections goes on.</p> <p>I cannot fathom how this could be deemed appropriate.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dellow, John
Consultee Full Name	John Dellow
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS496
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 13:47:00
Attached Files	John Dellow Map.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The LPR is not positively prepared and would not achieve the goal of sustainable development for West Berkshire and</p> <ul style="list-style-type: none"> • The LPR is not justified. Many of the grounds for assessment of impacts and benefits lack credibility and is not justified. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of land represents an appropriate strategy for WBC. • The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is achievable within the plan period. • The LPR is not consistent with national policy. In many instances the allocation for development of North East Thatcham directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB. The impact of development under policy 5P17 through the sustainability appraisal is fatally flawed and is not a matter that can be corrected through modifications to the plan. The process for selection of North East Thatcham as a development site is flawed. <p>In addition all aspects of the plan where greenfield sites are used have a negative impact on the locations itself and the environment. It is extremely disappointing that this Plan has been produced in such an unprofessional way.</p> <p>Healthcare</p> <p>The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to refer to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is no detail or insight into strategic healthcare planning.</p> <p>Proposals for a major development that is likely to have a significant health impact in relation to its size and location, require a Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. The proposals to how the proposals for development have been discussed with health service providers regarding impacts on primary care. All development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the development. The impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that neither Wokingham and private stakeholders respectively, appear to have arranged or published a prospective HIA specific to the proposed development.</p> <p>Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy was developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Health and Wellbeing Board. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to determine the impact associated with new development. It is of concern that there appears to have been no direct engagement between the North East Thatcham Consortium and local general practices.</p> <p>Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for new practices. Figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an ever increasing number of areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or the future.</p> <p>GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable. It would extend the range of services and primary healthcare professionals available on a single site. It would make no financial sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional costs and staffing costs and encumbrance working across two sites.</p> <p>There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor space or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the Thatcham to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of Thatcham. It is likely to be supported by Thatcham</p> <p>Town Council but has not been suggested in the sustainability appraisal of site options. Local practices did not have a 3000 sq m floor size proposal which they only discovered with the 5P17 Policy of December 2022, Appendix D.</p> <p>The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Mill Surgery (Mill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are currently run by Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 27,800 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on primary care. There are more young children, a higher maternity workload, less local extended family support and there is initially a higher demand for services and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care locally.</p> <p>Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients referred for NHS and private dental care.</p> <p>Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentist (or a dentist outside Thatcham). There is no evidence provided that either WBC or the developers have approached any local dentist to assess the potential impact of increased workload resulting from additional housing.</p> <p>Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates, 2016) Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in 2016 provides no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at the heart of the health centre.</p> <p>Conclusion:</p>

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having appropriate agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and so have not borne the burden that 1,500 or more new houses will make on a local NHS struggling to cope.

The objective of WBC and the North-East Thatcham Development Consortium to improve access to the health service infrastructure has not been met as they have not provided evidence for the provision of a viable primary care medical centre.

Transport

1 Increased Traffic

Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a recurring theme was the impact on the villages. We sought assurances and were led to understand by WBC planners that traffic from the development would be routed to the A4. This is true but what they 'forgot' to mention was a plan for an exit at the north of the site onto Harts Hill. This only came to light in January when the Transport assessment was published: Phase 2 Transport Assessment Report July 2021.pdf(westthatcham.gov.uk) because traffic from, or to, the site is only going to go in one direction from this exit —towards Upper Bucklebury via the road going through Cold Ash and the traffic through Upper Bucklebury and Chapel Row.

The proposed development will funnel traffic from the development and, WBC predicts, - 'some displacement of A4 traffic to the A4 as Upper Bucklebury'. This would be where the roads are inadequate, without pavements and have the potential for accidents. However, the document has no modelling results for this. There are drawings for all the other proposed junctions but not for this one?

2 Access and junctions

The Transport Assessment says at paragraph 3.26 'The access arrangements for the northern end of the NET site proposed are to be provided (with right turn lanes where appropriate) on both Floral Way and Hans Hill Road. Results from the modelling suggest that these arrangements will be sufficient to meet the needs of the development. However, the document has no modelling results for this. There are drawings for all the other proposed junctions but not for this one?'

3 Car Parks

We have also seen drawings showing a new car park on Harts Hill. The purpose is a mystery but will surely add more traffic to an already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park area.

4 Safe and Sustainable Transport

The Sustainability Appraisal (SA) | Strategic Environmental Assessment (SEA) which accompanies the Local Plan covers the development of North East Thatcham against key Sustainability Objectives.

Objective 4 is — To promote and maximise opportunities for all forms of safe and sustainable transport. The SEA makes the following points:

- 'To Reduce Accidents and Improve Safety' Council Assessment - The policy is likely to have a Positive impact on safety. This will be critical to the design of the site.
- 'To increase opportunities for walking, cycling and use of public transport' Council Assessment — Significant Positive impact. - The policy is likely to have a significant impact on walking, cycling and public transport as the development will provide facilities to encourage these modes of transport.

Education

1 Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Plan. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to assess the impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 NE Thatcham Strategic Environmental Assessment states that 'the site will provide Early Years provision'.

The provision for Primary school education is unclear and contradictory. There is no data or evidence on the planned primary school requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. However, as the land is not available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state the location of the provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs or Kennet schools. Both are in the catchment area for both.

Where schools are oversubscribed those children who live nearer to the school are given precedence. This means that those from Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is inconsistent incomplete and contradictory on the provision of secondary schooling in and around Thatcham. The Supporting documentation. It proposes that the sum of £15 million be contributed by the developers to Secondary Education. However, the location of the land to be provided and hence no possibility of assessing its suitability.

Please see the link below to The Thatcham NE Development Plan 2020 (part of the LPR *supporting documentation):

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new (6-8FE Entry) secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the NE Thatcham development (which proposed 2,500 houses), is not sustainable. Specifically

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The proposed provision is not sufficient on its own to fill a 6- 8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. It is not considered feasible for a new school to be smaller than 6FE.

With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a second sustainable in this location.

Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on a study in 2011. Clearly the use of 11 year old data is inadequate. The Development Plan states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably education in more detail as any development comes forward.

The LPR Review to 2039, Policy 5P17, now states that land (but not the Secondary school itself) will be provided for

In summary, it is therefore clear that the plan for secondary school provision is 'unsound':

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Conclusion on Schooling:

West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. Funding across all school years is not defined or evidenced in the LPR.

2 Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the road, the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If not, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public for other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide sports fields has not been supported. There is no evidence for funding or for a suitable location.

Environmental Issues

There are a number of serious environmental threats posed by the proposed Thatcham North East strategic development:

- 1 Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area (*see map at end) and its ancient woodland, the Common;
- 2 Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB that will be valued by the open countryside by local communities;
- 3 Causing detrimental impacts to legally protected wildlife known to be present on the site, whilst erroneously assuming that measures can be taken after development e.g. through the vague promise of a 'community park'.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support of SP17, there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is evidence to suggest it will have a significantly negative impact.

For example, the WBC states in the LPR that a Sustainability Charter is required to establish how 'policy requirements for legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability). It is not informed by' various strategy documents (including one on ecology). Yet, the strategy documents either do not exist or are not available for the Regulation 19 consultation.

At least 4,000 people will be concentrated in the development site. They of course must have access to green space for recreation. The claimed provisions for green space cannot satisfy this demand on site. The original Thatcham Growth Plan had 'country parks' spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming the potential for significant enhancement of its current land use. No details were provided about how they would be formed. The feasibility study by Bucklebury Partnership, a lack of preparation for such country parks, not least that they should be merged, and properly managed and funded for their enhancement. Now, in the updated 5P17 text the country parks have been downgraded to undefined 'community parks'. The WBC commitment WOC has given to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be impacts on adjacent areas. Indeed, the LPR states its intent for 5P17 to drive additional traffic (people and cars) into the AONB. The proposed network which will 'take advantage of the landscape' to facilitate connection to the AONB, and include leisure routes through the AONB. Meanwhile, the management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the site, working to restore and nurture.

In fact, the LPR's own Sustainability Appraisal accepts that 5P17 will have a negative impact on environmental sustainability at the site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated. There are no details on any such mitigation measures: the assumption is simply that they will somehow be found during the planning application process.

However, the very same Sustainability Appraisal suggests that the 5P17 policy is likely to have an overall positive impact on the environment (by absurdly ignoring the environmental consequences in favour of social and economic benefits that are anyway high on the list herein).

The overall thrust of the SP17 policy is clearly to build as many houses as possible in a small area of countryside, without regard to how the environment — human and natural — will be improved or, if not, mitigated. Despite all the money spent on consultation plans and justify the 'growth' requirement, there is no evidence of any serious attempt to investigate, analyse and systematise the impacts.

Everything will be all right because their own unsubstantiated policies say it will be.

<Attachment: Map of BOA and Ancient/protected woodland>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McGowan, Helen
Consultee Full Name	Helen McGowan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS501
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 19:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I object to this planning application. There aren't enough schools, doctors, road infrastructure for the amount of houses and surrounding areas.</p> <p>Also we are very lucky to have an area of natural beauty filled with wild animals and plants. This area cannot be used for other sites are other sites around that are not areas of beauty and have access to major roads. More homework is needed on this.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>There are other sites around that are not areas of beauty and have access to major roads. More homework is needed on this.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tritschler, Elizabeth
Consultee Full Name	Elizabeth Tritschler
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS269
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 17:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to voice my concern and objection to the proposed development of 1,500 - 2,500 houses along the A4 as there are parts of the plan that are not sound, and the result would have a negative impact on the area's infrastructure.</p> <p>ENVIRONMENTAL IMPACT</p> <ul style="list-style-type: none"> - the planned area of developments is stunningly beautiful and is home to a wide and diverse wildlife population, and strategic policy states that it will focus on the environment but I can't see any evidence that SP17 will have anything to do with the environment. The site is a greenfield site and would result in a negative impact on the environment which would need details of how this would be. - Within the LPR it states that a sustainability charter is required to show how biodiversity net gains are to be achieved in the strategic documents. Do they exist. - Insufficient green space has been included in the proposal for a development of this size. The original Thatcham green space of two country parks across the top slopes inside the Biodiversity area claiming potential for for significant biodiversity net gains. Bucklebury parish councils feasibility study showed lack of preparation for country parks. In the updated LPR the green spaces have been downgraded to undefined community parks. Where is the responsibility that we have to protecting the natural environment in the new development will naturally want to explore the area. Our environment needs to be protected from any increase in traffic and addressed. <p>The vision for the management of Bucklebury Common focuses on not increasing human pressures and to restore a natural environment.</p> <p>INFRASTRUCTURE</p> <ul style="list-style-type: none"> - There does not appear to be clear plans for the provision for schooling for a development of this size just a vague promise of provision but not when this is going to be provided. Is this to be provided before housing is built? - As a resident of Upper Bucklebury we are in the catchment of both The Downs School and Kennet School. However, school children in Upper Bucklebury would be limited to the Downs which is substantially further away. The latest LPR proposes a secondary school by the developers to secondary education . What does this mean and where would it be situated? Would it mean yet another school and destroyed? - There has been insufficient research into healthcare facilities which will be required with the increased population and it is difficult to arrange a doctors appointment and I fear what affect the increased in housing will make. The North- East Thatcham development proposes a primary healthcare facility and suggests that a GP surgery is offered to Buckinghamshire , Oxfordshire and West integrated Care Board. However, there is no evidence that a fit for purpose Health Impact Assessment has been conducted for the proposed North East Thatcham development in accordance with the current guidance from Public Health England. - My family currently travel to Reading for the dentist. Thatcham dental practices are overstretched and are unable to take more patients. <p>TRAFFIC</p> <p>Traffic in Thatcham and the surrounding area's will be adversely affected. I am particularly concerned about the increase in traffic into Upper Bucklebury and the surrounding villages. The proposed exit to the north end of development on to Harts Hill Farm will increase traffic into Upper Bucklebury where the roads are inadequate for the increased traffic and many roads do not have pavements. This increases the risk of serious accidents in an area where there are substantial numbers of walkers and cyclists.</p> <p>I am deeply saddened that the local planning review is to destroy such a beautiful area of the countryside. We would have liked to think that we should be able to look further into developing brownfield sites and to preserve our countryside for generations to enjoy.</p> <p>In conclusion I would like to register my objection to these plans. The impact on Upper Bucklebury will be extremely negative. Upper Bucklebury is a peaceful village whose inhabitants value to beauty and tranquility of the surrounding countryside. I find it difficult to believe increasing Thatcham to this extent would not negatively change the nature of the town, surrounding villages</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lewington, Sarah
Consultee Full Name	Sarah Lewington
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS282
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 20:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to raise my strong objection to the proposal of developing land for housing on the farmland between Upton and Floral Way.</p> <p>West Berks Council has increasing opportunities to redevelop existing and emerging brownfield sites to accommodate housing, considering destroying yet more greenfield sites in the beautiful Thames Valley.</p> <p>Out of town business parks and retail parks built in the late 1990's early 2000's in the Newbury and Thatcham area, and Pinchington Lane Retail Park, has resulted in the slow demise of Newbury and Thatcham town centres due to loss of jobs and office workers.</p> <p>More recently, advances in technology has enabled people to shop and work from home and as a result, towns are becoming increasingly less attractive.</p> <p>Now with the recent occurrence of a global pandemic, and the requirement for home working and internet shopping, out of town business parks and retail parks in Newbury, Thatcham and Reading are increasingly becoming vacant spaces.</p> <p>These brownfield sites have a lot of infrastructure already in place and can be revived, improved, enhanced and developed.</p> <p>As well as benefiting nature and its biodiversity, our green spaces are proving invaluable for more people than ever before, providing pleasant experiences to clear our minds and breathe fresh air.</p> <p>In my opinion, it is poor foresight to develop greenfield sites when brownfield sites are increasingly becoming underutilised.</p> <p>Planning departments are at the forefront of enabling change and making the right decisions for the future, allowing greenfield sites to encroach on the beautiful countryside is not the right decision for the future of the country or the planet.</p>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Ford, Jeff
<p>Consultee Full Name</p>	Jeff Ford
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS500
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	28/02/2023 15:55:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing in response to the above plan, particularly as it effects North Thatcham.</p> <p>Traffic from proposed new housing in North Thatcham</p> <p>With the proposed housing while I see the A4 is supposed to take a lot of the increase in traffic I would expect the 50% increase in traffic to the south the Level crossing traffic would increase with no mitigation (Bridge?). To the North would see increase to Upper Bucklebury which I feel is not designed for the increase, and would become a rat run.</p> <p>Also, Harts Hill Road (which shows on the plan to have car park for some reason) is not suitable for increase traffic, particularly on the twisting hill which is a problem now. Also, it has no pedestrian walkway if some of the children from this estate were to walk to school in Upper Bucklebury. At present it is dangerous to walk up or down this hill, particularly in the dark.</p> <p>Healthcare & Dental Practices</p> <p>All 3 GP Surgeries are overstretched and there appears to have not been by WBC or the developers to any approach to accommodate the 3-4,000 extra people.</p> <p>The Thatcham dental practises are unable to provide for the present population. Has WBC or the Developers approached any other dental practices?</p> <p>Environment</p> <p>Bucklebury Common is a wonderful place, but has risks with additional major housing on its doorstep of being damaged. This risk can be mitigated. Indeed, the management vision for the Common is explicitly focused on not increasing human pressure on the Common. The two 'County Parks' quoted we now note in SP17 have been downgraded to 'Community Parks, whatever this means. How the 4000 residents will have outdoor space to roam without effecting Bucklebury Common.</p> <p>Education</p> <p>While I have no children of school age, I am concerned that secondary school choice may reduce. At present children from The Downs as they are in the catchment.</p> <p>Where schools are oversubscribed those children who live nearer get priority. This would affect children wishing to go to school (from Upper Bucklebury as I can see no concrete evidence that an additional school is to be build or the increase in school places.)</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hodgson, Kathryn
Consultee Full Name	Mrs Kathryn Hodgson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS509
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 16:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Having followed the proposed development of Siege Cross over many years, I am very puzzled as to why, having opposed it in 2015, that WBC are suggesting that it would be appropriate for 3 times that (likely 5 times that in the end).</p> <p>All their 2015 objections are no less valid today.</p> <p>I have lived locally since 1995, over the years, I've seen flooding increase dramatically, particularly on the A4 at Colthrop. It has been done to alleviate it. I can't see that paving farmland and building houses on it will help that situation one iota.</p> <p>The proposals for schools are ludicrous, as are those for GPs. Thatcham Medical Practice is unable to fully staff its surgery, a phone appointment took 3.5 weeks. The only way to see a doctor within a sensible timescale would be to lie about your symptoms, prepared to do.</p> <p>At peak times, it is nigh on impossible to turn right onto Floral Way so traffic ends up turning left and on to Harts Hill, causing extra traffic from the development. This will inevitably lead to more rat-running through Upper Bucklebury and Chapel Road, causing gridlock. Everyone knows that this development will involve an enormous number of extra car journeys, it is naive to think that many will use public transport, walk or cycle. The majority of houses on Dunstan Park have at least 2 cars, this development will mean many may have more as children remain in their family homes for longer due to the extreme costs of independent living. There will be a prospective increase of over 6000 Other people have mentioned the green gap, the AONB, the organic farmland that is being lost at the points.</p> <p>Why is more attention not being given to the proposed development at Colthrop, this will avoid further congestion at Colthrop brownfield land?</p> <p>Thames Water have stated that there will need to be infrastructure improvements for this to go ahead. They are already planning this as this is an area which needs close scrutiny too.</p> <p>I am a firm objector to this scheme in its current form.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North Wessex Downs AONB
Consultee Full Name	Rebecca Davies
Consultee Organisation	North Wessex Downs AONB
Agent Full Name	
Agent Organisation	
Comment ID	PS721
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 14:19:41
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	Yes

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Key that the delivery of the allocation is led by a masterplan, this should be set by the LPA and not a developer. The an SPD and then clearly sets the guidelines, building height, lighting staryegy, highway layout and landscaping to enured watering down the policy.</p> <p>A country park would not promote access to the AONB but attract dog walkers into a sensitive landscape character are which has the potential to be a conflict. The skyline as outlined in the Sensitivity assessment is the most sensitive to c to enhance the skyline and the ladscape character, it therefore needs to be a local asset which enhances the setting of and maintance of this is essential if the LPA want to enhcance and conserve the AONB and its special qualities.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Masterplan to be created by LPA</p> <p>Biodiversity net gain 20%</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wells, Elaine
Consultee Full Name	Elaine Wells
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS683
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	There is not adequate consideration given to the wider implications to the existing communities that will be affected
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	No

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	The current infrastructure already cannot cope with increased traffic volume. Harts Hill pumping station has historical year for years.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	I have lived in Carbinswood Lane (Bucklebury end) for over 40 years and can give an experienced view on the impact years have had on the environment.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Neville, Richard
<p>Consultee Full Name</p>	Mr Richard Neville
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS473

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 12:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I would like to object to the proposal to build 2500 homes in NW Thatcham for the following reasons: <ol style="list-style-type: none"> 1 This volume of houses would lead to them overdevelopment of Thatcham and mean that the town will more or Upper Bucklebury. 2 The extra traffic will cause many problems such as <ul style="list-style-type: none"> • increased volume using the level crossing in Thatcham which already causes long traffic jams

	<ul style="list-style-type: none"> Harts Hill is a narrow and winding road which is barely wide enough for two large vehicles to pass. There are already cars and cyclists already take their lives in their hands when they cycle up or down it. The idea of so much more traffic is horrifying. the roads in the vicinity are not well maintained and pot holes often appear over winter and in wet periods. It's a bit of a mess up with the repairs at the moment and this would be worse with increased volumes of traffic <ol style="list-style-type: none"> Bucklebury Common and the surrounding areas are home to a wide diversity of wildlife much of which is on the edge of extinction. Species for example tawny owls, bats, slow worms, tree pipits and night jays. If these houses are built it will lead to the destruction of much of the habitat and biodiversity of the area which is more or less adjacent to the site and the destruction of much of the habitat and biodiversity of the area There is no provision for doctors' or dentist surgeries. It's already very difficult to get a doctor's appointment and in our area. How will the 5000 (minimum) people get medical and dental treatment?
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heslop, Gordon
Consultee Full Name	Mr Gordon Heslop
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS346
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web

Response Date	28/02/2023 15:27:26
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	I believe legal requirements have been complied with.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Community:- The Development Plan (SP17) proposes a new primary healthcare facility, however there does not appear to be a Health Impact Assessment (HIA), without which the impact on existing communities and suitability for a new development is unclear and likely to be negative.</p> <p>The proposed plan for secondary education defined in SP17 is unsound. There is no evidence to estimate the number of pupils the school is to serve, no evidence the proposed funding is sufficient to meet the Council's obligation to provide education for all children of the school, no definition for the number of Form Entries and no clarity on timeframe for funding.</p> <p>Green Infrastructure:- SP17 provides no evidence that the development will have a positive impact on the environment. The proposed development to Bucklebury Plateau Biodiversity Opportunity Area within the North Wessex Downs AONB, which includes Ancient Woodland, does not allow for adequate protection of these areas and no evidence has been provided to suggest otherwise, contrary to national planning policy.</p> <p>Transport:- The Sustainability Proposal (SA) and Strategic Environmental Assessment (SEA) at the proposed Thatcham development are likely to have a positive impact on road safety and to increase opportunities for walking, cycling and public transport. A detailed assessment has been provided. Specific details of plan and proposals should be provided to accurately assess this.</p> <p>Sustainability:- SP17 states a Sustainability Charter is required which will be informed by strategy documents which have not been produced. Further there are no proven plans for providing adequate green space or protecting or improving existing green space. The Appraisal contradicts itself by accepting that SP17 will have a negative impact on environmental sustainability, whilst also claiming an overall positive impact on sustainability. Much greater clarity is required and more detailed comprehensive assessments are needed to properly assess the impact of the proposed development on the environment and sustainability.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Proper detailed assessments of impact to environment, completion of HIA, full assessment of educational needs and better proposals to ensure protection of protected habitats and green space.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Health Centre
Consultee Full Name	Linda Lawson
Consultee Organisation	Thatcham Medical Practice
Agent Full Name	
Agent Organisation	
Comment ID	PS1109
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	07/03/2023 12:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*Late Response*</p> <p>Thatcham Medical Practice Consultation Submission.</p> <p>Thatcham Medical Practice is one of three local practices affected by the planned development of 1500 residential units affected by the proposed development of 85 dwellings on land at lower way. Site Ref :THA025.</p> <p>Thatcham Medical Practice currently has 18,632 registered patients. We provide medical care for patients who reside over the past 5 years have employed additional allied health professionals and nursing staff to meet the increasingly patient population. 3 in 8 of our patients have a least one long term condition and 10% are aged 75 years or over. As a result of the need for more 'accessible' clinical rooms.</p> <p>We wish to continue to register all patients who move into our practice boundaries, however the predicted increase in new housing developments would not be manageable in the absence of further premises development.</p> <p>The draft policy indicates 450 sq m of GP surgery is to be offered to the Buckinghamshire, Oxfordshire and Berkshire Health Care Trust or other such body. This would be the equivalent of a Satellite Site or Hub, which we wouldn't support. It would not be fit for purpose and be unable to meet GMS contract requirements and associated standards of healthcare.</p> <p>If the appropriate funding was made available, we could extensively restructure our internal building to create more a footprint of our current premises. This would accommodate patients, within our practice boundary, who move into the new building. This investment would include putting in a lift to the 1st floor to create 4 additional clinical rooms.</p> <p>Whilst we support proposed plans for a new surgery to be relocated within the NE Thatcham Development site, in the absence of the healthcare provision for patients at Thatcham Medical Practice would be severely compromised.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Network Rail
Consultee Full Name	Ms Lisa Bullock
Consultee Organisation	Network Rail
Agent Full Name	
Agent Organisation	
Comment ID	PS1093
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>2. North East Thattham Strategic Site Allocation</p> <p>Policy SP17 North East Thattham Strategic Site Allocation looks to provide an urban extension at Thattham. The rail traffic travelling into or from Thattham southwards will travel over Thattham level crossing.</p> <p>Thattham level crossing is a public highway crossing with manually controlled barriers (locally monitored by CCTV), and freight trains per day crossing, 9234 vehicles and 162 pedestrians or cyclists (figures recorded in Aug 2019). The barriers at this crossing are down more than ½ of the time, as such traffic backs up and more often, than not, vehicles can cross. This is identified in the Thattham Strategic Growth Study (TSGS) at para 2.19 which states that...</p> <p><i>2.19 There is a level crossing at Thattham on Chamberhouse Mill Lane/Station Road which is a constraint for north-south traffic often forming in peak periods on both sides of the railway. These queues sometimes do not clear before the barriers close next train.</i></p> <p>Network Rail often received complaints in this regard. The only solution to this would be an alternative crossing such as a bridge. Unfortunately, the TSGS has concluded that providing a bridge would encourage increases in traffic which would be not the case that the provision of an additional 1,500 dwellings would be the cause for the increase the traffic, which would exacerbate the level crossing thus exacerbating the queuing situation?</p> <p>An urban extension to Thattham will increase traffic, queues will become longer, more complaints will be made, and more crossing will occur.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As stated in our previous comments on this plan, a viability assessment should be undertaken which includes a level crossing to ensure that this development would be able to provide the required infrastructure to mitigate the impact of the level crossing</p> <p>Changes to SP17 should include Mitigation of the development's impacts on the highways network with improvements to the level crossing where they are needed and delivery of new access points for all forms of movement and transport to be agreed with the planning authority.</p> <p>We believe that without an alternative for vehicles using the Thattham level crossing the development proposed for Policy DM42, g. which requires new development to improve the safety and operational capacity of the local road network will be unviable.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brims, John
Consultee Full Name	John Brims
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS723
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 14:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	I am not sure I am qualified to answer this question and why it is posed to a member of the public as it may dissuade a response. As there is no, Don't know, I have answered No. A Planning Inspector should be the person to make this
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>We continue to strongly object to the proposal to build a revised number of 1500 homes in NE Thatcham (THA20). Firstly, you highlight a revision has been made to THA20 reducing the number of homes to be built from 2,500 to 1,500 in the statement. In the previous consultation under REG18, the proposal was to build 1,250 homes in the first plan period and 250 homes. In addition to this, the site area for THA20 has not changed. Why is that? It demonstrates that WBC has a number of objections to this site and has not used the time between receiving the REG18 responses and opening the REG18 detailed plan and design for the site. Notwithstanding this comment, we object to the whole proposed site under THA20. You have responded in part to our objections raised in relation to the REG18 consultation. Sadly, most of the responses have not been answered under each heading.</p> <p>Grazeley</p> <p>We do not think you have adequately answered our concerns over the removal of the garden town site at Grazeley. The site is in the local plan. Not only that, the plan doesn't address the proximity of the THA20 site to AWE and Burghfield.</p> <p>Housing allocation</p> <p>Your response to my points on housing allocation was answered thus</p> <p><i>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's methodology which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase in the LHN due to slightly changed housing affordability ratios published in March 2022).</i></p> <p><i>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be based on a housing need assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances exist which also reflects current and future demographic trends and market signals. The Council does not consider there are any exceptional circumstances which justify an alternative approach and the available evidence does not support any reduction of the local housing need below the minimum number of homes needed.</i></p> <p><i>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration. A range requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met. The range has been proposed to allow for approximately 5% additional homes. The use of a range helps the Council meet the objectives of the NPPF but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers of homes than the standard methodology.</i></p> <p>Since this response was written, On 6 December 2022, Michael Gove, Secretary for Levelling Up, Housing and Communities issued a ministerial statement which set out to end the obligation on local authorities to maintain a rolling five-year supply of homes. The LHN figures are up-to-date. WBC has a local plan to 2026 and whilst understanding the new rules have not been finalised, why are you not addressing some of the current consultations before proceeding with the LPR and in particular with this plan for THA20 which received a large number of objections? The outcome of the Government consultation could easily provide the opportunity for WBC to address these concerns and maybe others within the LPR.</p> <p>Strategic Gap</p> <p>You failed to answer this point at all.</p> <p>The Strategic gap between Thatcham and Upper Bucklebury will be all but removed. Floral Way was meant to be the new road in Thatcham and this should be maintained.</p> <p>The land in north Thatcham rises gently towards the ridge along Burdens Heath and Cold Ash towards the boundary with the AONB. The gap from the urban area of North Thatcham to the AONB must be maintained. Council planners have made much of this</p>

plans for applications within THA20 in the past and yet choose to ignore what they have previously written within this proposed development is within 600m of the AONB. This development will have a major adverse impact on the AONB

Traffic

Again, your response is wholly inadequate.

In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified of the highway network identified as being potentially problematic by the end of the plan period. Having said that, there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared (without development).

However, a development of this nature would not be expected to go ahead without mitigation measures and improvements to the highway networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate traffic as a result of the development. The modelling outputs focus on the impacts for

both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be included in the transport plan.

I repeat, we have lived in this area for over 40 years and there have been no improvements to the road network in the area other than to build the Floral Way Road and the road from the A4 to the station for Seige Cross. They have provided the Floral Way developments but absolutely no improvements to the A4.

You talk about mitigation measures, what are they? When we moved to Newbury 40 years ago we used to turn off the A4 to drive through Upper Bucklebury to get to Reading and the M4 in the morning. Since that time, the houses referred to in the mitigation measures in the villages apart from a bit of traffic calming and no improvements to the A4 anywhere along the M4 or Reading. Another 1,500 homes will generate at least that number of traffic movements per day and you admit that the Floral Way and the A4; it doesn't take a genius to work out where the traffic will go to avoid the pinch points.

“The package should better accommodate the expected increase in traffic as a result of the development”.

Should? What isn't the plan being developed so it WILL?

“Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be included in the overall transport plan”. What are these measures?

There is absolutely nothing in this plan to support that statement. Firstly, the location of parts of THA20 are not in a pinch point. How does someone get from the far reaches of the proposed development to say, Thatcham Station or the town? If you have to cross the A4, this would cause more stoppages on the A4 and exacerbate the issues at the junctions. There is no sustainable movement of people.

Bucklebury Common

You woefully underestimate the impact on Bucklebury Common and your response again is wholly inadequate.

In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant loss of open space which would be expected to serve the new population (and benefit the existing population). In relation to wildlife impact, a baseline assessment has been undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Assessment (HELAA), one of the LPR evidence documents.

This development will conservatively be occupied by 4,000 or so people. The area's identified as open space will not be open space. Bucklebury Common on your doorstep, where do you think the majority of the people will go? The AONB should be given the same status as the National Park. Where is the thought process in your plan to achieve this? The plan is all but removing any protection of the common. It shows a complete disregard of the environmental and ecological issues that the proposed development will have. I am sure as I know others have a will point out the issues in great detail which we wholly support.

Alternative Sites

The continued dismissal of the Colthrop site is not sustainable. The Council talks about mitigation measures for THA20 but is being considered to positively assess the Colthrop site? This site is far more sustainable in its proximity to Thatcham and would deliver the required bridge over the railway to alleviate access to the A339 and the South. That could also give easier access to Greenham Common for the residents.

One of the best proposals I've heard during this whole process is to use the Kennet School and Francis Bailey school site. A purpose-built school and leisure complex to the North of the A4. This could have so many advantages if thought through properly and will not and never deliver.

Summary

We strongly object to the proposal for the above reasons but what depresses us even more about this part of the LPR is the lack of thought and ambition in the plan to deliver a long term strategic plan for Newbury, Thatcham, the Villages and the regeneration strategy for Thatcham town centre to encourage people not to get into their cars and drive to Reading or to make the area sustainable with easy access to transport hubs? We live in a changing world where the requirements will be very different from what we've known in the past. Global warming will mean 100-year events will happen far more frequently about what will be required by our children and their children. This plan takes us to 2039; we need to start to rethinking the plan is yet another opportunity lost.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I am not sure I am qualified to answer this question and why it is posed to a member of the public as it may dissuade a response. As there is no, Don't know, I have answered No. A Planning Inspector should be the person to make this judgement.</p>
<p>4. Proposed Changes</p>	<p>I believe many changes are required. A Planning Inspector is the person to make this judgement.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The Planning Inspector needs to understand the weight of opposition to some of the plan proposals. You cannot tell me how you feel about the plan in a written document.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Orfanos, Poppy
Consultee Full Name	Ms Poppy Orfanos
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS806
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 22:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to exercise my right as a parishioner to object to this proposal and understand that my comments will contribute to the LPR process which seeks to determine whether West Berkshire's LPR is sound and legally compliant.</p> <p>The proposed development of 1500 homes in NE Thatcham has "been identified as the best location in West Berkshire."</p> <p>It is difficult to accept, on the basis of what has been presented, why this is the case.</p> <p>Its primary purpose appears to be to resolve West Berkshire's strategic housing needs not to address Thatcham's housing needs. The availability of land promoted by four landowners appears to have been the significant factor in the choice of this site. The impact on the environment and landscape has been minimised, somehow to be mitigated but without sufficient evidence.</p> <p>There seems to have been a reluctance to pursue other potential development sites, Brownfield sites when these are available, and a generation of land and utilise existing traffic access points.</p> <p>It seems to be a flawed plan determined to utilise a Greenfield site with a severe negative impact on the local environment.</p> <p>Overall it does not appear to meet the tests of soundness.</p> <p>Infrastructure</p> <p>The new development does not have to make good existing deficiencies, no additional funding is secured to enable the new development. Resident's lives will not be improved. All services will be under more strain.</p> <p>Education</p> <p>There is already pressure on Secondary schools, the Kennet is already oversubscribed. The current site cannot accommodate a new Secondary school. Provision for a new Secondary school within the site will not meet WB's 2013 policy for minimum viable size.</p> <p>Health</p> <p>There is pressure on all services, GP surgeries and accompanying health care resources, dental practices and pharmacies. The new Primary Care facility is not accompanied with a Health Impact Assessment and there is little evidence that the proposal will improve health.</p> <p>It lacks evidence that local general practices have been engaged in considering its size and scale or that the Berkshire Health Group has been involved. It does not seem that WB has complied with its legal duty to engage.</p> <p>It is questionable as to whether a new practice could be established at all.</p>

Transport

Clearly the proposed development will lead to increased traffic and further congestion.

.Floral Way ,with its feeder roads from the estate leading into it ,was agreed in the 1990s by the estate's developer t when the new estate was agreed.

There is insufficient evidence to demonstrate that Floral Way can cope with additional traffic from the SP 17 proposal the inevitable increase in traffic directed towards it ? No evidence that it can. Traffic modelling is not good enough.

New access points on Floral Way and Harts Hill will only compound the problem . The results of modelling have not t

The creation of a new car park north of Floral Way on Harts Hill Road can only add to the problem.

It is difficult to equate the proposal with a reduction in traffic ,particularly towards the villages .The predicted displacement is difficult to equate with the policy to "promote and maximise opportunities for all forms of safe and sustainable trans

Harts Hill Road is narrow with difficult contours for motorists, cyclists and the few pedestrians who use it .It has various bends and attempt to restrict the speeding down its lower slope. This road will see an increase in traffic and pose a

Information about Transport has been difficult to access with new priority junctions only apparent in January.

The LPR states it wishes to "reduce accidents and improve safety " .This seems contradictory.

It is impossible to see how the proposal will have a positive impact.

There is no provision for increased car parking at the station . The proposal may seek to endorse WB policy of reducing forms of transport there will inevitably be increased demand resulting from the development.

Landscape ,Ecology re Policy SP17

The scale of the proposed development will have a negative impact on the landscape and effectively urbanise the area measures.

The siting of this major greenfield development will destroy the landscape, the sense of space and countryside.It will skyline.

The Landscape Character Assessment identified key characteristics as valued qualities.

Including the varied landcover mosaic and important habitats and It's very rural character.

It recognised that the development so close to the ANOB boundary on upper valley slopes would be difficult to mitigate

Siting it so close to an ANOB with no up to date evidence nor a strategy for positive impact and overall diversity gain is required to protect the ANOB and will fail to do so.It conflicts with National Policy in relation to landscape character

There will be inevitable collateral damage to the Common, ancient woodlands and Heath.The damage is irreversible established hedgerows are not protected.

There is no evidence to support the claim that it will have a positive effect on the environment.

The Sustainability Charter requirements are not met,

There is no evidence that strategy documents including one on ecology have been made available publicly.

There is no evidence that the site provides enough green space or that the proposed Community Parks will enhance meaningful environmental value or that leisure routes won't harm the ecology,

It enables damage and harm to the Bucklebury Plateau Biodiversity Area . It poses risk to legally protected wildlife.

The Landscape Sensibility and Capacity study raised awareness of the adverse effects on landscape character and long term obstruction of views .

Ecology

The plan has been made with insufficient work on the ecology of the site.There has been no adequate ecological survey based on old surveys has been used.

Local work has identified the rich and varied wildlife present on the site but this has been minimised. Loss of habitat sources No feasibility study to inform proposal.

There has been insufficient reference to wildlife corridors between the ANOB and other areas.

There is insufficient work on how much damage promoting visitors to these areas will bring. The Increased footfall on t to the ecosystems. This is in conflict with WB's Vision.

Insufficient evidence on effects of increase on air, noise, and light pollution.

No studies presented which deal with implications of site disturbance.

Lack of strategic gapSP 17

Loss of current strategic gap between Thatcham and Bucklebury.

WB planning policy was once to preserve the gap and maintain separation between communities.

	<p>The value of maintaining a strategic gap seems to have been underplayed to justify this development. The urbanisation of Thatcham and Bucklebury. WB values the mix of rural villages, this would be put at risk</p> <p>WB policy recognises the importance of maintaining community identity as a significant factor in community well being. Well being is an element of WB policy that should be taken into account.</p> <p>Climate changes flood risks</p> <p>No evidence that a net zero carbon development would be viable or has been costed. Not in keeping with WB policy. Impact on flood alleviation scheme not properly considered.</p> <p>Loss of greenland on the slopes and its effect on surface water run off underplayed.</p> <p>No evidence that the proposers have sought to ensure WB's policy that there should be no adverse impact on the w</p> <p>The proposed development</p> <p>Why Thatcham?</p> <p>Thatcham has already had more than its fair share of large scale developments.</p> <p>A last minute decision to find an alternative site for a strategic development.</p> <p>Demonstrated by much of the evidence and supporting information being out of date or missing.</p> <p>The government 's position changed in December 2022 and housing requirement numbers are now advisory not mandatory. HELAA identified brownfield sites suitable for housing ,a more equitable and sustainable solution.WB need not continue</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	CPRE Berkshire
<p>Consultee Full Name</p>	CPRE Berkshire

Consultee Organisation	CPRE Berkshire
Agent Full Name	
Agent Organisation	
Comment ID	PS1049
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>CPRE Berkshire has over 400 members and supporters</p> <p><i>Introduction:</i> The Campaign to Protect Rural England (CPRE, the countryside charity), Berkshire Branch welcomes the Draft West Berkshire Local Plan. We would like to express our appreciation of the documentation that has been provided for the accessibility of the supporting information.</p> <p><i>CPRE concerns:</i></p> <ol style="list-style-type: none"> 1. We remain concerned however about the introduction of further housing some of the land allocations and would be concerned concerning air quality impact both on the new areas for development and on nearby areas of important landscape and countryside. 2. The main purpose of this response however is to express our great concern regarding the appearance of a major development which is proposed to be allocated for mixed use settlement in North East Thattham, (the Floral Way) which we believe is contrary to national planning policy and certain to cause disruption and unredeemable harm to what is currently an especially a high quality rural landscape. 3. Similarly the land adjoining The Haven, Kintbury (Site Ref: KIN6) in which 20 dwellings are proposed, will cause a significant impact on the AONB countryside, increase car fumes and cause traffic congestion in a small village location. The road network is a narrow and entrance used by neighbouring villages of Combe and Inkpen, which also serves the industrial estate located in the village. 4. The two areas above are part of the AONB/green field area. where landscape is "managed to conserve and enhance the natural beauty with its designation". 5. CPRE believes that genuine housing needs in West Berkshire can more than adequately be met by regenerating brownfield land, rather than sacrificing countryside in and around the AONB or by swamping local villages with excessive development. A reduction in the housing numbers currently imposed on West Berkshire as they are no longer binding but are merely a reflection of government policy announced by Housing Secretary, Michael Gove. West Berkshire has 53 brownfield sites totalling 1,200 dwellings. A rough estimate would allow building of 2837 homes without the need to build on any farmland or countryside, and without any impact on the rural environment, especially the AONB. 6. Many of WBC old list of 25 approved development sites have now been built on and it would be helpful if years of this could be used for housing. <p><i>Additional comments:</i></p> <ol style="list-style-type: none"> 1. The draft plan proposes a large strategic development area NE of Thattham now for 1500 dwellings to 2039, although in the longer term. It would run uphill to the AONB and be a source of light pollution. This has brought strong opposition from the village of its landscape and traffic impacts. Given the recent statement by minister Gove that where there are significant impacts on the countryside could reduce their housing numbers: WBC should pursue this and reduce the numbers of housing.. 2. There are sites along the A4 valley which would be better for housing rather than commercial use. One report mentioned some 170 homes in the Siege Cross/Colthrop area with a bridge crossing the railway and canal, something Thattham would support. Government funding should be available to implement this. 3. The uses of the area by the A329 into Newbury and along the A4 have been debated for a long time. It could be a good idea for a mixed development with some small blocks of flats for local workers. 4. Proposals for a large distribution centre east of Thattham was reported in Newbury News some months ago and since the end of 2 Feb to WBC asking about its location received no reply. It would be bad environmentally with a lot of large lorries on the poor roads through Thattham and through Aldermaston village. Policy SP8 recommends that larger distribution sites B8 should be near motorway junctions. Again, this would be a bad idea. <p><i>Conclusion:</i> CPRE Berkshire believe that the two specific sites mentioned above, included in the draft Local Plan, are contrary to the countryside; are unsustainable due to poor infrastructure; and cause unnecessary destruction of the landscape and countryside.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speller, Simon
Consultee Full Name	Mr Simon Speller
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS976
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 12:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

- * Yes
- * No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

I write to object to the above Plan in relation to policy SP17 relating to North East Thatcham.

The allocation of this site was identified at the earlier Regulation 18 stage of Plan making, that proposal was for a large allocation of land for a new GP surgery, which was then reduced in the proposed new Local Plan and then continuing after into the Plan beyond. The allocation has since been reduced to a much smaller scale, solely the Council's response to the need to set out a longer-term vision for such a scale of allocations. The Council's response to set a longer-term vision for the site (and Thatcham) which in itself is a fairly damning indictment of the Council's lack of a clear and ineffective planning policy approach.

The Council have significantly re-thought the allocation and reduced its scale resulting in a very different Plan from that which was proposed. The Council have completely failed to consider alternative sites or areas of growth on the back of this rethink, despite the fact that the Council have a clear approach. It is disappointing that alternative sites in Thatcham have had no serious consideration (either in combination with other sites) and instead the Council have continued with what appears to be rather an unambitious and a flawed amendment to the current policy.

The result of this approach is a very disappointing policy for the local population of Thatcham that lacks ambition and does not provide any certainty this will be a development that meets the needs of existing and new residents. It is not positive that the Council have extended the town and it does not address deficiencies in services and amenities which are required by new residents. The following are not covered adequately by the policy as drafted and would request that these limitations are addressed in the policy wording:

- 1 Reference to quality of design and building beautiful - this is not adequately addressed and should be a key consideration in the development;
- 2 Commitment to the allocation delivering and not simply 'offering' land for a new GP surgery. There is a clear need for a solution to delivery this is a significant flaw of the policy as drafted. The allocation should be on the basis of a provision for healthcare, or failing that the delivery of an off-site redevelopment of the existing GP practice in Thatcham. Thatcham and lack of space capacity this isn't a "nice to have" item it is essential to have a workable solution to such a need not addressing that positively;
- 3 The provision of key worker housing (rather than simply affordable housing) to house our future health care, police and other services is a requirement of policy for this site;
- 4 There is inadequate justification as to the scale of countryside being used for this allocation, as this seems to be the result of smaller proposals for 1,500 dwellings (Reg 19) as the previous much larger proposals. This cannot be right and is not supported by the evidence base. Such an approach is unsound and the Council need to re-define a smaller site area, or define undeveloped land to address this point.
- 5 There are inadequate proposals to address healthy living and sporting provision in Thatcham. This provision is a key requirement for growth needs to improve the offering substantially in the policy requirements;
- 6 There appears to be no understanding of how viable the policy is to deliver. The policy for net zero and the high performance buildings need to be viable or provided with flexibility to ensure the other infrastructure needs (and not "nice to haves") are not compromised and through lack of viability;
- 7 The requirement for housing to be energy efficient is welcome but the Council should seek to deliver this through the use of Passivhaus rather than leave elements less well defined;
- 8 Public open space and the availability of this from both new and existing residents should be better covered in the policy;
- 9 Given the Reg 18 allocation was for a much larger site and the planning authority have only moved away from that allocation, the changes to Central Government policy (rather than a local re-think or reconsideration of the availability or appropriateness) is extremely poor planning not to consider how this allocation would not be expanded in future Plan periods, as unduly restrictive and considered and planned for now to ensure it isn't frustrated;
- 10 The policy appears to be protecting the central barns on the site for heritage purposes (which is supported and laudable for future use. Ironically, Thatcham has already suffered from similar poor planning by the Council on a barn centrally located in the town a decade or more (now converted to a house). The policy needs to positively set out the use of these buildings to serve the existing one;
- 11 Electric Vehicle Charging for new residents and to serve the wider town should be addressed in the policy;

	If this is considered to be the right location for this scale of growth and the red line of the allocation were corrected the comprehensive approach to this very significant allocation. It appears the Council are entirely out of their depth in doing needs significant re-drafting to achieve what the Council perhaps aspire to and much more importantly what the people
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cook, Joanna
Consultee Full Name	Joanna Cooke
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS247
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	24/02/2023 11:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I find the plan unsound for a number of reasons. These reasons are listed below.</p> <ol style="list-style-type: none"> 1 TRANSPORT. 2 Increased traffic. <p>I am very concerned about the amount of increased traffic that the development will bring to not only Upper Bucklebury such as Cold Ash. In particular I am extremely concerned about the plan for an exit at the north of the development with no modelling results for this junction in the Transport Assessment and no drawings either. Considering there are dra junctions, I find it very worrying that the proposed junction on Harts Hill Road does not appear to have been researched. Harts Hill Road will be able to confirm, this road is completely inadequate for larger amounts of traffic, has no pavement, and has had serious accidents, as can be confirmed just from earlier this year with large numbers of cars having trouble on the road to be called out to at least one accident due to the road conditions.</p> <ol style="list-style-type: none"> 1 Safe and sustainable transport. <p>I question the Council Assessment that states '<i>the policy is likely to have a positive impact on road safety as safe transport routes to the site.</i>' Considering WBC also predicts that there will be '<i>some displacement of A4 traffic onto wider rural routes such as the A4300</i>' I can see how both statements can be true when the rural route leading to Upper Bucklebury is already inadequate and unsafe as stated above.</p> <p>I also question the council statement that '<i>the policy is likely to have a significant impact on walking, cycling and public transport should be designed with these in mind.</i>' Firstly, the popular and scenic walking route over the fields between Upper Bucklebury and Harts Hill Road will be replaced with houses, and I do not see this as a positive change. Secondly, the increased traffic on Harts Hill Road is dangerous for cyclists, and it is already dangerous to the point where I would not cycle along it myself, or let my child cycle. I am expecting my oldest child to start attending Kennet School in September, it would be an extremely convenient option for her to travel from school, especially as sustainability is something that is important to me, however there is absolutely no way that she can travel to her to cycle on Harts Hill Road as it is already too dangerous, narrow and busy for cyclists to feel safe. Thirdly, as public transport in Upper Bucklebury, we need to travel to Thatcham in order to be able to use it, so it is unclear to me how this large increase in the local public transport service under yet more pressure and also make it more difficult for residents of Upper Bucklebury due to increased traffic on Harts Hill Road – will be a positive thing.</p> <ol style="list-style-type: none"> 1 Primary school and nursery provision.

	<p>1</p> <p>There are no details in the LPR for the provision of nursery, early years and primary education. There is no data or information on the number of schools or form entry requirements, and with the only referenced data being 12 years old, I fail to see how this can be used to inform the LPR.</p> <p>1 Secondary education provision.</p> <p>Currently, many children from Bucklebury attend Kennet School (our nearest catchment school), which is oversubscribed. Children who live nearer to the school are given precedence, this would mean that children from the proposed NE Thatcham Development would have to travel further to Kennet School, although Kennet would be very unlikely to be able to accommodate all of them. Children from Bucklebury would have to travel further to Kennet School as they are only in a secondary catchment area for, and secondly is a 45 minute bus ride away compared to the very short distance to Kennet School.</p> <p>It is clear that already there are not enough secondary school places in Thatcham and therefore a secondary school would be a matter of necessity for this proposed development. However, there are no details of the land to be provided. In addition, it is clear that the NE Thatcham Development is not sufficient to fill a 6 Form Entry secondary school on its own, so it is unclear how the development at all, and the plan is therefore not even considering the effect this would have on the children already living in the surrounding area. Children of this development would be unable to attend their local school. Obviously it goes without saying, that forcing children to travel further away, will both contribute to the increased traffic issues and will be extremely detrimental to sustainability objectives.</p> <p>1 Sports fields.</p> <p>The LPR mentions providing sports fields, however these need to be on flat ground of which the only suitable area is the area around the school in the area with the most traffic fumes (see my earlier point regarding transport, for info on increased traffic). There are no details for these facilities, and the LPR also seems to assume that the school playing fields (assuming the school is even viable) can be used for use as sports fields. It is highly unlikely that this would be the case, as schools would not be able to allow public access to their playing fields for reasons among many others.</p> <p>1</p> <p>1 It is extremely concerning that the LPR fully states its intent to purposely direct extra traffic straight into the area of the AONB ('...displacement of A4 traffic onto wider rural routes such as Upper Bucklebury'). It is clear that the proposed development is so close to the AONB and which currently provides a home to legally protected wildlife, will have a huge detrimental impact on the area and public enjoyment of it.</p> <p>2 A request for an access road for just five new homes in Cold Ash has recently been refused by the council due to the 'adverse impact' this would cause. The same argument also applies for this development, only on a much larger scale. The impact of this development, with its adverse suburbanising impact, than situating thousands of new homes on greenfield land just a mile from the AONB.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Vevers, Geoffrey
<p>Consultee Full Name</p>	Geoffrey Vevers

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS261
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 15:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>I object to the plan as proposed.</p> <p>There has been inadequate assessment of its impact on the environment: it is greenfield when brownfield sites are available for poor reasons. This needs to be reviewed particularly in the light of recent Government advice.</p> <p>No consideration has been made for the effect on the flora and fauna (including humans) neither on this area nor the area subject to flooding (who remembers 2007?). Also the increased light and noise pollution associated with a further 5000 houses.</p> <p>Educational and medical provisions are already stretched in this area and no effective attempt has been made to plan for what is not for the future. Grandly it is stated that there will be new schools and health provision but where is the money? Where will the skilled manpower come from?</p> <p>The original plan suggested that all the extra traffic would exit onto A4, but now an exit onto Harts Hill Road is proposed. Harts Hill road is unable to cope with the present volume of traffic and fast driving. It is already a dangerous road particularly in winter.</p> <p>This proposal is poorly thought out and lacks precision.</p> <p>It is true that some housing is needed, but where, how and with what services needs to be represented.</p> <p>I am happy to elaborate on any of these points</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Powell, Duncan
Consultee Full Name	Duncan Powell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS767
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail	Letter

* Letter * Other * SMS * Web * Unknown	
Response Date	02/03/2023 09:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to voice my concern and objection to the proposed development of approx. 2500 home in North- East T...</p> <p>be unsound.</p> <p>The effects of this proposal are devastating for the town of Thatcham, and I imagine there will be plenty of objections from... are principally focussed on the village of Upper Bucklebury and the adverse impact on our community.</p> <p>It is impossible to overestimate the negative impact this development will have on Upper Bucklebury. Whichever way y... creeping up the hill, Upper Bucklebury will all but merge with Thatcham, separated only by a small copse at the end... good thing for the identity of our village and for the peace, tranquillity, and security of our community.</p> <p>I understand the need for development and accept that we must build more homes, but I question the need to build a... irrespective of current targets. It seems a totally disproportionate allocation in-an area where so little of the land is de... plains. The plans would have been in place well before the Covid pandemic, so would it not be sensible to review the... nature of our demographics and working patterns since then? If the plan was to house commuters to London, who k... or be required to, work in London (or in any office) in the post-Covid world? If the work pattern continues to favour a</p>

then who will choose to come and live in such an expensive area? Also, with the birth rate dropping and local primary schools closing, will we see half empty classrooms in the proposed new school(s)? It will be more likely that the schools will be empty. If, however, these new houses were purchased by keen commuters and assuming people returned to office work in Luton, Thatcham train station will cope with the hundreds of extra cars that would need to be parked there. Not everyone will need a car, but the facilities there would just not be adequate.

Transport

It was interesting to hear in an initial presentation last year of the estimated 12% increase in traffic heading up Harts Hill. This is already significant on such a dangerous hill, but unfortunately is probably an overly conservative estimate. It will be worse. Congestion on the A4 and Floral Way (already congested at peak times) leads to more Rat Run traffic through our village. For environmental and noise concerns, many parents will be concerned for the safety of their children in the village especially at the school.

The addition of an exit from the new development on to Harts Hill in the new plan will only exacerbate the problem of traffic heading up Harts Hill to access the A34 or M4 westbound via Cold Ash or through Upper Bucklebury, Chapel Row and the M4. This latter route will also cause serious congestion at peak times at the junction with the A340 at Theale.

Harts Hill is already a dangerous road without pavements, and I believe the increase in traffic on this road will just be a disaster.

The plan to build a car park halfway up Harts Hill is also a cause for concern. Apart from not being sure of its purpose, it will be a prime location for intimidating gatherings and antisocial behaviour.

Healthcare

There are serious concerns over healthcare provision to accompany the new development. Although there is a (small) health centre facility provided for in the plan, it is my understanding that a development proposal of the size of this one should have had a Health Impact Assessment (HIA) in place outlining how the details of the proposal have been discussed with the health service providers. Only a few discussions would support the proposal, but it is of grave concern that we have no evidence that either the developer or the council has organised an HIA.

To compound this concern, since the NHS are struggling to recruit new GPs and are not opening many new practices, it is unlikely to get a new GP practice in Thatcham at all and the current provision would not be able to cope with the huge increase in demand that would bring. Thatcham Health Centre, Burdwood and Chapel Row are already bursting at the seams.

Neither local GP practices nor local dental practices appear to have been consulted on the potential impact of the development and as a result only woefully inadequate and unrealistic provision has been made in the plan.

Environment

The inevitable increase of visitors to our village/parish and Bucklebury Common can only have a detrimental effect on the ancient woodlands, meadows and wildlife that need to be protected. Bucklebury Parish Council say on their website: "Loss of ancient woodlands as a result of inappropriate management are one of the most damaging threats facing rare species in Berkshire. These woodlands wherever possible and appropriate advice sought on managing them to conserve the natural diversity of life and to halt the loss of not only in Berkshire but also in the UK."

If this development were to go ahead, these precious woodlands and rare habitats would almost certainly be under threat. The increase in the visitor numbers - our woodlands would be a short hop for the residents of the new development compared to the surrounding area they could walk (or drive!!) to.

We can see no evidence that the new plans provide for adequate green spaces or for the protection of biodiversity. With so many people housed in the new development needing access to green spaces, there can only be a negative impact as the development encroaches on Bucklebury Common and the adjacent AONB.

I was bemused by the proposal of a 'Country Park' in the original plan (now interestingly changed to 'Community Park'). In reality, it is a steep bit of land that would be too difficult and expensive to build on, so it is conveniently turned into a 'Park'. It would be interesting to know what this park would look like. Steep slopes do not really lend themselves to intensive use. There is no evidence of budget allocated to maintain it long term. All discussions around the proposed park and its protection have been ignored.

Education

New educational establishments seem to be part of the plan but the details on this are insufficient and contradictory. There are plans for education facilities for all children in West Berkshire, but there is no detail on how they will do this with the addition of thousands of children housed in the new development.

It appears that the developers will provide a sum of money toward building a new primary school, but the timing of this is unclear (or whether they will provide sufficient funding). Unless it is built first, there is the risk they will not be built at all. The new houses will necessarily have already found a school solution for their children.

Similarly for secondary school provision. A contribution by the developers may be insufficient and it is unclear what this would be (given no details on proposed location so there is no assessment on the impact on traffic). If government guidelines stating that a 6-form entry are unsustainable, we would be looking at a new school with at least a GFE. However, we appear to have no idea of pupils that the school would need to cater for, so the number of form entries is not stipulated in the plan. Interestingly, a development of 2,500 houses would not provide enough pupils to fill a 6-8 FE school suggesting a smaller school would be smaller than a 6FE school is unfeasible. Unsound again.

Conclusion

In summary, I would like to register my objection to these plans in the strongest terms. The impact on the village of Upper Bucklebury with increased traffic, a steady flow of visitors seeping in and the consequential damage to the local environment, the village will change forever and not for the better. These issues, together with the lack of evidence that adequate provision of facilities has been incorporated in the proposal make the Local Plan completely unsound in my view.

I would urge WBC to reconsider the whole plan, given that housing allocations previously set are now only advisory. Instead of building 2,500 homes, so alternative, smaller sites can be sought for a reduced number of new homes. Please follow the lead of other developers who have paused their plans based on previous housing allocations and work on a revised plan later in the year based on realistic assumptions. This could mean a vastly reduced number of new houses.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Murray, James
<p>Consultee Full Name</p>	James Murray
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1086
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	03/03/2023 16:12:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to you regarding the above review. I am strongly objecting against the proposed plan based on the issues highlighted below.</p> <p>Transport</p> <ul style="list-style-type: none"> • The area is about to be swamped by traffic that cannot be handled by current infrastructure not to mention the impact on the local ecosystem. • There is a plan for an exit at the north site onto Harts Hill. This will push traffic toward Upper Bucklebury, and beyond. The infrastructure cannot take this and neither can wildlife. This would have a major impact on the local environment. • The Transport Assessment talks about new priority junctions, but modelling suggests there won't be problems, and no improvements in modelling results at all for Harts Hill. • Parking will be an issue too. A car park is being shown on Harts Hill, this is close to the common which again carries a high risk to people and people. • Roads safety will become an issue due to busier roads affecting cycling, running, riding which will all become more difficult. <p>Healthcare and Infrastructure</p> <ul style="list-style-type: none"> • There is no detailed healthcare planning in the document, there is no detailed talk of a new GP or dental practice being provided by WBC or the developers to any local GP practice to understand how stretched they already are. • Local GP practices like Thatcham, Burdwood and Chapel Row are already all full. • There doesn't seem to be any provisions to look after people in this proposed development. <p>Environment</p> <ul style="list-style-type: none"> • It is hard to believe Council would want to allow for 1,500 houses on agricultural land right next to an area of outstanding natural beauty. • There is a huge danger to the Bucklebury Plateau Biodiversity Opportunity Area including its woodlands and wetlands. • There is a huge promise of a community park sounds both suburban and ill thought. • The WBC states in the LPR that a Sustainability Charter is required, yet no strategy docs have been submitted to show legally required biodiversity net gains. • There is no provision for recreation or green space for another 4,000 people coming. Plan mentions a vague community park. Instead people are going to flood into the AOB, Bucklebury, Chapel Row, Yattendon. • The LPR's own Sustainability Appraisal has some very sad news, and revelation, even it concedes that SP17 is a greenfield site. Why is environmental sustainability so why building on a greenfield site?

	<p>Education</p> <ul style="list-style-type: none"> • No coherent plan has been put forward, no details of nursery or early years. • Primary school education is contradictory in terms of planned numbers, secondary schools are already oversubscribed that is being suggested however cannot be filled, as government guidelines are that such schools with less than 100 pupils should be closed. • There is no funding earmarked for school facilities sports ground etc. <p>I strongly believe WBC should pause/stop this plan and instead wait for an updated planning guidance that is coming.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Ridley-Day, Ed
<p>Consultee Full Name</p>	Ed Ridley-Day
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS257
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Web
<p>Response Date</p>	26/02/2023 13:16:22

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>It is my view that the planned development of >1500 new homes as part of the NE Thatcham development is not sound particularly for the reasons below. I also highlight that many of these objections were raised by the council itself when W blocked the building of 500 homes in 2015...</p> <p>Traffic and access: there is already a high volume of traffic along the A4 between Reading and Newbury, including does not adequately address access/ traffic volumes. It would still rely on access from the A4 or Harts Hill Rd. In addition the A4 access routes will lead to a material increase in traffic through the villages in the adjacent AONB, inc. Upper...</p> <p>Healthcare facilities: there is already substantial pressure on healthcare provision in West Berkshire, as there is already one new GP surgery but given the number of new residents and the extent to which existing services are oversubscribed.</p> <p>Access to education: Similarly the planned expansion will put substantial pressure on secondary schools in the area which are over-subscribed.</p> <p>Environmental damage: in addition to the removal of fields and hedgerows there will be consequential damage to Bucklebury resulting in increasing damage to an ecosystem of national importance</p> <p>The planned 'green spaces' for the new development are small within the scheme's size, and will provide no meaningful benefit.</p> <p>Lack of a gap between Thatcham and Upper Bucklebury – Thatcham and Upper Bucklebury will effectively merge together resulting in encroachment of Thatcham towards the AONB border and the village.</p> <p>I highlight that many similar objections were raised by West Berkshire Council itself in blocking the development of 500 new homes development - in 2015.</p> <p>At that time <i>the Council argued</i> that the proposed 2015 development would:</p>

	<ul style="list-style-type: none"> Urbanise the key areas of sensitivity [...] including: the lower slopes of an important ridge line; Big Gully, a local area and long views across the Kennet Valley; the lack of development with scattered farmsteads and minor rural historic settlement at Siege Cross Farm. Detract from the enjoyment of the character and appearance of the AONB in views from the escarpment south of the ridge line. Erode the identity of Thatcham as being separate to that of the surrounding rural settlements. Fail to conserve the historic landscape setting and rural context of Siege Cross Farm.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Parkes, Nicola K
Consultee Full Name	Nicola K Parkes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS265
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 14:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>This letter is an OBJECTION to the LPR, particularly those aspects related to SP17. The writer finds the LP proposed set out below. I am prepared to appear and make addition submissions to the Planning Inspectorate if asked.</p> <p>I live in <address redacted> and the main impact of the proposed development will be an unwanted increase in traffic through Chapel Row and along The Avenue. This route will be the 'rat-run' to Theale, Reading and the M4 east-bound.</p> <p>WBC accept 'some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury' and by extension C effect on residents. The roads are not wide, and the wider road network completely unsuited to commuter traffic.</p> <p>Throughout the Reg 18 period and in public meetings between Bucklebury Parish Council and WBC planners' assured ingress and egress would be to and from the A4 and Floral Way. However, hidden within the evidence pack offered a is referenced. There are no drawings of its position or topography. This late addition, lacking any analysis, demonstration and consultation with the communities affected. This additional junction is both a danger and will have a significant o It is dangerous because Harts Hill is narrow, winding and the junction's position is shielded by a blind bend in the do</p> <p>The addition of 1500 or more houses will result in more car movements. There are no identified employment opportunities few within walking distance. Additional commuter traffic is inevitable.</p> <p>The A4 is already gridlocked at peak times and residents will seek to avoid jams. The junction with Harts Hill provides tested show that traffic from the site for the A34 and M4 west will route via Cold Ash and that for Theale, Reading and Bucklebury, Chapel Row and Bradfield South End. This is an antithesis of WBC's assertion that the A4 will be the pri</p>

	<p>Traffic through the villages, Upper Bucklebury and Cold Ash will increase – this is acknowledged by WBC – but no me The roads are without pavements, narrow and used by children to walk to school or to the school bus. Horses use th and to bridleways. The feeder lanes to this village route are designated “quiet lanes” traffic will inevitably also oversp route,s The increase in traffic will inevitably lead to disruption and accidents on all the lanes.</p> <p>That no credible account of traffic is included in the evidence demonstrates unsoundness.</p> <p>The choice of Thatcham Northeast for development of 1500 or 2500 homes is a poor choice. The LPR is unsound, un in a cooperative way. It fails to reflect the needs of the community and the lack of insight into the effects of additional example.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Vevers, Ingrid E
Consultee Full Name	Ingrid E Vevers
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS278
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	26/02/2023 18:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I fervently object to the above proposed development.</p> <p>It is going to use greenfield land when we have many brownfield sites available that could be developed instead. Once greenfield is lost as forever.</p> <p>There is no independent environmental study of the existing flora and fauna of the proposed site. It is said that there is no offence to disturb or damage badgers habitations, a prison sentence is mandatory (Protection of Badgers Act 1992) for agriculture, forestry and drainage purposes.</p> <p>These fields act as a sump to protect the buildings lower down in the valley. This reduces any flooding to the south of the hill. If built upon not only will those buildings be flooded but also those further down the hill. Harts Hill Road will become a watercourse.</p> <p>The junction of the A4 and Harts Hill Road is well formed with pavements and traffic lights up to the roundabout on Floral Way. Floral Way becomes a country lane. Further up the hill there are tall hedges with mature overhanging trees, the road twists as a narrow lane for challenging driving with no provision for pedestrians at all but used by both cyclists and pedestrians and E scooters on the pavement, consistent with being a country lane.</p> <p>The original plans showed that the estate would empty onto the A4 and Floral Way without involving Upper Bucklebury. The current version mentions an access point on Harts Hill Road to the new buildings.</p>

	<p>I have lived in Upper Bucklebury for <redacted> years and the pollution has increased markedly. There are more vehicles despite the traffic calming measures which are not always honoured by lorries and farm machinery, especially at harvest time. This will increase if there are more houses with attendant cars.</p> <p>Upper Bucklebury has no street lighting which benefits nocturnal animals, but makes the road through the village, Broadlands and cyclists; any increase in traffic will exacerbate this.</p> <p>The plan overall is poorly conceived. There are small parking areas, random recreational areas and newly planted 'wild' areas which are an oxymoron. Ancient woodland is precious and should never be altered as there is so little of it.</p> <p>There is inadequate infrastructure to support the existing population of Thatcham without adding more houses.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heslop, Colin
Consultee Full Name	Colin Heslop
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS286
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Web
Response Date	27/02/2023 22:40:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am of the opinion that the basis for the amount of development in general has been set on out of date information desire to balance the development between the north and the south of the country. Added to this the Thatcham area of the West Berks development over the last 50 years, when compared to the rest of West Berks. The proposed Thatcham lost greenfield division between Thatcham and Bucklebury, when there is a considerable amount of Brownfield sites
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Parascandolo, John
Consultee Full Name	John Parascandolo
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1110
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/02/2023 16:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to the proposed development outlined for the North East Thatcham Strategic Site Allocation on the following grounds:</p> <ol style="list-style-type: none"> 1. Traffic – increased traffic through Upper Bucklebury and Chapel Row 2. Pressure on school places in the area 3 TwoPoints in direct contradiction to the recent government’s announcement- Five-year delivery plan to restore nature and improve the environmental quality of the air, our waters and our land - <ol style="list-style-type: none"> A) Consequential damage to the common B) Greenfield development abutting an AONB with negative impact on biodiversity 4. Pressure on medical & complementary services in the area 5 Number and type of houses far in excess of needs of the area
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Shearn, Elizabeth
Consultee Full Name	Elizabeth Shearn
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS319
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 18:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am objecting to the Thatcham NE development plan because it is unsound. I am a student at Kennet school which children should go to my school while a new school is built. There is no information about where this school will be or pupils for it to exist.</p> <p>I am driven to school and the traffic is bad in our village and in Thatcham. This will get much worse once the houses an exit at Hart's Hill.</p> <p>It's been great to go to school near my home and have school friends that live near me but the development may mean in my village will have to go to The Downs if our catchment is changed.</p> <p>I often walk on the fields that will built on on and on Bucklebury Common. The plan will not conserve the environment because houses will be built on it on lots more people will be walking on the Common.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dalgarno, Ian
Consultee Full Name	Mr Ian Dalgarno
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS314

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 15:44:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>I would like to register my objections to the proposed building of between 1500/2500 houses on the North East of Th Regulation 19 Objection. >Name, address, email and telephone no. redacted< I am against the development because of the environmental impact it will have on Bucklebury Common as well as th Bucklebury Common has many legally protected species including ground nesting birds. Even a proportion of the po their dogs who will come onto the common will cause significant disturbance and damage as happened during Covi The green sites on the proposed development will not satisfy the demand for green space by all the inhabitants of the p by yourselves with the complete lack of strategy documents. The flagrant carelessness displayed in the consultation document for the environment are at best vague and at worst a Council supposedly working for the people are prepared to accept this destruction of their local environment. Leading on from this there is the dramatic increase in traffic which will inevitably pass up Harts Hill, onto Broad Lane the surrounding small 'quiet' lanes. Cycling or walking is already hazardous in these lanes and will become impossib is inevitable. The consultation document actually admits this increase. From reading the local newspapers there is already sewage being dumped into the Kennet and Avon canal suggesti water and sewage systems are overloaded. Unless there is a huge investment by Thames Water to address this ther issue which must be given urgent consideration. There is insufficient infrastructure such as Surgeries and Schooling – already overstretched areas. The whole plan is unsound and based on something paid for by developers who have nothing but financial gain in m Leveling Up Housing and Communities has had the sense to back down on the number of houses needing to be bui Indeed the Government has recently said that green field development can be reconsidered. There seems to have b to consider alternative brown field sites. It does seem to me there are many flaws in the proposed plan of this unnecessary development and I do hope that t</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pinkard, Andy
<p>Consultee Full Name</p>	Andy Pinkard
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS368
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	01/03/2023 09:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The LPR is not positively prepared and would not achieve the goal of sustainable development for WBC and the wider area.</p> <p>The LPR is not justified. Many of the grounds for assessment of impacts and benefits lack credibility and is not based on credible evidence. The alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham is the best strategy for WBC.</p> <p>The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable over the plan period.</p> <p>The LPR is not consistent with national policy. In many instances the allocation for development of North East Thatcham directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.</p> <p>My Objections are:-</p>

	<p>Transport</p> <p>The WBC accepts that there will be 'some displacement of A4 traffic onto wider rural areas such as Upper Bucklebury Assessment Report July 2021 shows an exit onto Harts Hill. Traffic exiting here will most certainly continue on the rural roads Cold Ash & Chapel Row and is in addition to 'some displacement'.</p> <p>The new residents in the development will be commuting to Reading and Newbury so soon the Chapel Row – Cold Ash is a choice. This is a rural road with existing accident blackspots, with little pedestrian provision, and passing a number of farms.</p> <p>The Transport Assessment proposes priority junctions at each exit from the site, but show no modelling evidence, and no drawings.</p> <p>Safe and Sustainable Transport</p> <p>The Strategic Environmental Assessment (SEA) , Objective 4 is "To promote and maximise opportunities for all forms of transport. Increasing traffic onto the surrounding rural roads is counter to Objective 4.</p> <p>Public Transport to the rural villages will not be supported by the development as the desirable routing would be by rail.</p> <p>Healthcare.</p> <p>Given the size of the proposed development, why is there no Health Impact Assessment (HIA)? How does the proposed development fit into the existing provision? It is my understanding that it is unlikely that an existing GP practice would entertain the proposed development. Consequently, the demand will spill over into already overcrowded GP practices.</p> <p>Environment</p> <p>I can find no evidence in the WBC submission to support the claims that the development will have positive impact on the environment. The Appraisal accepts that the development will have a negative impact on environmental sustainability, declaring this would be the case if no such measures are provided.</p> <p>I would estimate an additional 4,000 people will be looking to have access to green space for recreation and well being 'green parks' which have no accepted definition and can hardly be interpreted as taking access to green space seriously.</p> <p>The natural focus of the 4,000 inhabitants will be the Ancient and protected woodlands adjacent to the site, counter to the fragile ecosystems of Bucklebury Common.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Weedon, Peter
<p>Consultee Full Name</p>	Peter Weedon
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS768
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 20:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	As a resident of Upper Bucklebury since 1998 I object strongly to the proposed Local Plan. I believe it to be unsound and will have an irreversible negative impact on the quality of life.

	<p>Transport</p> <p>Access to/from the development will be via the A4 which is already gridlocked at peak times with traffic backing up along to Reading or the M4/A34 will inevitably seek an alternative route up Harts Hill through Upper Bucklebury. Harts Hill has caused numerous accidents over the years and is especially dangerous in winter, even when gritted. The development through Upper Bucklebury and pose an increased risk to villagers walking their children to school in the morning or on no pavement along Burden's Heath, which cars will use to head towards Cold Ash and Junction 13 of the M4.</p> <p>Healthcare</p> <p>The healthcare proposals contain only wishful thinking with no detail and an absence of consultation with existing medical services. There have been no Health Impact Assessment. NHS England has commissioned few new GP practices, so the burden on existing ones is already overstretched. Bucklebury is fortunate to have a well-managed medical practice but it was stretched during the provision of repeat prescriptions and other services. An excess of new potential new patients will have a severe impact on its ability to service its current list.</p> <p>Environment</p> <p>The Plan will have a severe negative impact on the footpaths and woodland in the proximity of the development. Within the development and is traversed by means of a narrow footpath, with few visitors encountered on each walk. The development will increase footfall, widen the path and change the character of the area. Bucklebury Common similarly has many narrow paths, the flora and fauna. The development will result in a significant increase in pollution – light, noise and emissions – all of which will have a negative impact on the environment.</p> <p>Strategic gap</p> <p>Upper Bucklebury retains its separate identity from Thatcham solely because of the green strategic gap north of the village and distinct boundary between the two urban areas. If the North East Thatcham development proceeds Upper Bucklebury will merge with Thatcham and will itself become North East Thatcham. The rural nature of Upper Bucklebury will be destroyed.</p> <p>Education</p> <p>The Thatcham NE Development Plan, funded by the developers, was based on West Berkshire District Council data and is therefore out of date. The same plan also notes that the proposed development is not sufficient on its own to meet Government guidelines state that secondary schools with less than 6FE are not sustainable. The developer funding construction, and has no impact on the substantial running costs of the school. Much of the site is sloping and there is no sports field, unless it is close to the A4.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Woodland Trust
Consultee Full Name	Ms Bridget Fox
Consultee Organisation	The Woodland Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS855
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 00:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The policy as worded does not provide sufficient protection for the adjacent ancient woodland as required by the NP
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site is adjacent to the following areas of ancient woodland which require protection in line with the NPPF but there is no provision for this in the policy.</p> <ul style="list-style-type: none"> - The plantation (SU52056829) ASNW 2.92 Ha - Hartshill Copse (SU52706889) ASNW 22.82 Ha - Unnamed (SU53236822) ASNW 1.08 Ha - Unnamed (SU53346802) PAWS 2.01 Ha - Long Grove Copse (SU53646771) ASNW 18.02 Ha - Blacklands Copse (SU54216798) PAWS 27.63 Ha <p>We therefore propose amended wording to include requirement for appropriate buffers for adjacent ancient woodland</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>n/a</p>
<p>4. Proposed Changes</p>	<p>In order to comply with the NPPF requirement to protect ancient woodland and in line with draft LP Policy DM15, we propose to amend the wording of the Ecology Strategy to read:</p> <p><i>An Ecology Strategy which will set out:</i></p> <ul style="list-style-type: none"> <i>a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linking of habitats;</i> <i>how priority habitats and ecological features will be protected and enhanced;</i> <i>the creation of new ecological features; and a site-wide management plan.</i> <p>To read:</p> <p><i>An Ecology Strategy which will set out:</i></p> <ul style="list-style-type: none"> <i>a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linking of habitats, including appropriate buffers for the site (in line with policy DM15);</i> <i>the creation of new ecological features; and</i> <i>a site-wide management plan.</i>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	<p>n/a</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Cload, Pauline
Consultee Full Name	mrs Pauline Cload
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1099
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to add my voice as an objection to the planned massive housing building project sited in greenbelt land near Thatcham.</p> <p>I am very concerned that this plan is full of issues that will drastically and detrimentally affect the residents of both Thatcham and the surrounding villages like Cold Ash, Ashmore Green and Bucklebury. I believe there is clear evidence that the number of houses and the increase in traffic movements will overwhelm existing roads, schools and medical provisions of doctors and dentists. I am also very concerned that the greenbelt has been down played and this increase in housing will impact detrimentally on many species including protected cranes and badgers.</p> <p>It is clear from the plans and other information including government guidance that various thresholds will not be met for schools or dentists to be build; even if they could be staffed, which is doubtful given the current issues within those industries. The schools in the Thatcham area are at or above capacity and are situated in places which cannot be expended to account for such a large project. Thatcham has recently lost one pharmacy and another is closed more than it is open, it has no bank and limited shops. Residents are forced to take to their cars to get even the most basic services. Without the services to look after such a large project the whole project becomes unviable.</p> <p>As for roads, this number of houses, are sited in such a way to funnel huge amounts of traffic north to the M4 / A34. The roads are small and rural, barely capable of taking current traffic levels and are not suitable for widening or expansions. An increase in noise, fume and light pollution to the doorsteps of the many rural residents. The alternative, is shunting traffic out on to the surrounding roads. Many junctions are clogged at rush-hours or through sites were regular accidents happen. Wider, an increase in traffic will exacerbate the major issues around the Thatcham Level Crossing; which is totally unfit for purpose and causes massive attendant frustrations, delays and pollution.</p> <p>Finally, building such a large project on greenbelt land is against all sense, when we should be preserving our greenbelt. The environmental impact is woefully short of properly assessing the current landscape and its value to both the economy and the wealth of wildlife that calls it home. No amount of landscaping between houses or vague comments on the provision of green spaces will make up the total loss of many areas of farmland, hedges, trees and green spaces. While not in the AONB, it is well known that the greenbelt is the urban sprawl and the protected areas, as well as clear demarcations between Thatcham and many outlying villages. It is both the wildlife who use it and the very feel of the environment in this part of West Berkshire. Further, Thatcham has a long history in the past, much work has been done to protect the Kennet Vale from a repeat. There seems to be little concern in the plan that many new houses will have on the ability of those flood protections to cope. Nor do the plans take any note of the many trees on the hillside which are currently 'managed' by the expanses of green absorbent land which would be lost under concrete.</p> <p>In conclusion the whole plan is over sized, poorly presented and planned and I cannot find one positive thing to comment on. I object to this expansion of Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bearman, June
Consultee Full Name	June Bearman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS338
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 13:39:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to say no to the Thatcham NE Development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mullis, Sandra
Consultee Full Name	Mrs Sandra Mullis
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS342
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	27/02/2023 19:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I wish to register my objection to the proposed new 'Thatcham NE Development' as I find it unsound.</p> <p>Transport</p> <ul style="list-style-type: none"> Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a road through the villages. We sought assurances and were led to understand by WBC planners that traffic from the Way and the A4. This is true but what they 'forgot' to mention was a plan for an exit at the north of the site onto the A4, apparent on Friday, 6th January when the Transport assessment was published: Phase_2_Transport_Assessment. is serious for us because traffic from, or to, the site is only going to go in one direction from this exit – where it will split between the traffic going through Cold Ash and the traffic through Upper Bucklebury I understand there are access arrangements for the northern end of the NET site proposes new priority junctions (where appropriate) on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause any issues. The document has no modelling results for this. There are drawings for all the other proposed junctions but none for the new junctions. There are drawings showing a new car park on Harts Hill. The purpose is a mystery but will surely add more traffic to already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park. <p>Healthcare</p>

- The NE Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body **bereft of detail or insight into strategic healthcare planning!**
- It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, appear to have undertaken a prospective HIA specific to the proposed North-East Thatcham development.
- Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategic Partnership has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Wokingham Health and Wellbeing Partnership. **I have a concern that there appears to have been no direct engagement between the North-East Thatcham Consortium and local general practices.**

Environment

I have a concern on three main areas:

- Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area, and its ancient woodlands and heathland Common.
- Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB that will impact on the open countryside by local communities.
- Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient mitigation will be taken after development e.g. through the vague promise of a 'community park'
- Taken together, and after a thorough professional review of the background documentation provided by WBC in 2019, I have concluded that there is no evidence to support claims that SP17 will have a positive impact on the environment. **I have a reason to believe it will have a significantly negative impact.**
- I understand it has been estimated that at least 4,000 people will be concentrated in the development site. This will reduce the green space for recreation and general wellbeing. We do not believe that the claimed provisions for green space will be sufficient. The original Thatcham Growth Plan had a vague proposal for two 'country parks' spaced across the top of the Bucklebury Plateau Biodiversity Opportunity Area, claiming the potential for significant biodiversity enhancement over its current land use
- In the updated SP17 text, the country parks have been downgraded to undefined 'community parks' which only offer a limited benefit. WBC has given up protecting the natural environment and public enjoyment of it.

Education

Information has been provided by WBC regarding education, however I find the plan for secondary school provision is unclear.

- There is no satisfactory evidence of the number of pupils the school is to cater for;
- The location of a school(s) is not clear;
- The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- The timing of the funding is not clear; and
- There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education for all children in West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. Funding for secondary education across all school years is not defined or evidenced in the LPR.

Miscellaneous

The Regulation 18 Consultation stated that only 1250 dwellings would be built in the plan period, and this I understand is a maximum. The 15000 number is stated as both a minimum and an approximate number and supporting studies are still based on the assumption that this could increase to the original 2,500 when the plan is reviewed after 5 years or in the next plan period.

There is no evidence WBC has consulted properly with Thames Water over the time needed for provisions of water and sewerage for the proposed new dwellings.

The Secretary of State's Written Statement of 6th December 2022, which removed the need to maintain a 5-year housing strategy, and to update Local Plans, removed the top-down housing targets (particularly for Local Authorities with constraints like AONBs) and a transition period for LS's in final stages of preparing Local Plans and this statement should be taken into account by the Council.

In conclusion- because of the concerns I have raised, the Reg 19 PPR Submission in its entirety should be considered as non-compliant.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stimpson, Joan
Consultee Full Name	Joan Stimpson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS329
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 08:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to this development It to too many houses in one area without necessary infrastructure of med water.</p> <p>There would be also 2500+ extra cars on the roads locally which are already very busy.</p> <p>This would cause extra pollution, traffic congestion particularly on the A4, A340 and Thatcham train barriers.</p> <p>It would also cause a rat run through the local villages of Upper Bucklebury, Chapel Row and Bradfield Southend.</p> <p>There would be no separation between Upper Bucklebury and Thatcham with Upper Bucklebury losing its identity as Building on the country side would cause harm to the local ecology it would be ideal to look for other sites like Colth</p> <p>Also there is change from central government making specific numbers now only advisory .</p> <p>It now makes sense to pause and rethink this plan with a reduced scale and proper research .</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Steer, Christa
Consultee Full Name	Christa Steer
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS448
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	28/02/2023 20:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	
* Yes	
* No	

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

I am writing to object to this plan as a local resident who is impacted by the flawed nature of the plan and proposals.

First off, I live in the village of Upper Bucklebury. This plan directly and negatively impacts the traffic flow through the village walk to the local school as well as older children walking to the bus stops for their secondary school buses. This poses a significant safety threat, but also the current road infrastructure of the village is not viable to sustain the increased traffic at the exit at the north site on Harts Hill. Traffic to and from this site will be funnelled towards Upper Bucklebury. The road increased traffic will not only further deteriorate the quality of the road but poses increased safety risk due to volume of traffic on the village under significant burden and be of detriment to local residents.

The plan also details drawings of a new car park on Harts Hill which is unclear in its purpose. The logic behind this plan will add more traffic to an already busy road and may also encourage anti-social behaviour at night-time which will put local residents as putting local police under unnecessary burden.

Lastly on traffic impacts, the council has come back to the SEA and indicated 'the policy is likely to have a Positive impact on walking, cycling and public transport will be critical to the design of the site.' and 'The policy is likely to have a significant impact on walking, cycling and public transport should be designed with these in mind.' There is no substance to these statements. They do not adequately demonstrate how they will actually take effect. There is no clear evidence to support these statements and as such they must be considered unrealistic at worst.

Next; Healthcare. Concerningly, there is a lack of planning and care for this subject in the plan. There is no clear evidence of a Health Impact Assessment (HIA) specific to the proposed NE Thatcham development has been arranged or published by WBC or the developers. There is no recorded direct engagement between the NE Thatcham Development Consortium and local general practices (local GPs) or logistics around this.

The NHS Berkshire West Clinical Commissioning Group confirms there is a worse shortage of GPs in other parts of the country than that there is no real prospect of a new GP practice being established in Thatcham or West Berkshire as a result of this plan. This is a priority vs other areas in the country with greater need and demand. Any indication in the plan therefore around establishing a new GP practice is misleading, unrealistic and purely lip-service. The true viability has not been fully considered.

There has also been limited provision to mitigate the impact of increased patients to both local GP surgeries (three in total) and practices. The three GP surgeries (Thatcham Medical Practice, Chapel Row and Burdwood Surgery) are already over capacity for the population. Adding 1500 new houses and patients into that is therefore unfeasible.

Next; the environment. There are a number of challenges with regards to the environment for this plan which indicate a negative impact. There is concern over the damage to the Bucklebury Plateau Biodiversity Opportunity Area and particularly the Common. The plan does not support the claims that SP17 will have a positive impact on the environment - there is reason to believe the impact will be negative damage to the local biodiversity and the Common. A Sustainability Charter is required but there is no evidence that this will be published publicly.

With the development proposal and an estimate of 4000 additional people concentrated on one site the detailed proposals for parks are at risk of not being appropriate for the volume of people. There is no indication of management of parks or details of what they will look like. The initial proposed country parks have also now been downgraded to 'community parks.' The plan therefore does not provide green space and steps to protect biodiversity as well as lacking any mitigation of impact of footfall on nearby countryside.

The Sustainability Appraisal from the Local Plan Review accepts that SP17 will have a negative impact on environmental sustainability on a greenfield site and therefore would result in a negative impact on environmental sustainability which would need to be addressed in detail around plans to mitigate this; only the need to do so. The same Appraisal then contradicts this by indicating that the plan will support sustainability through not taking into consideration the impacts on the environment (impact on biodiversity, impact on protected species and legally protected wildlife) and outweighing any impacts with a perceived social and economic benefit impact.

Finally; Education. This is an area particularly important to me as a resident as I have a young son and another baby on the way. In the Local Plan Review, the provision of Nursery, Early Years, Primary and Secondary education is not clearly outlined. There are no details of how this will be provided. There is unclear information shared around Primary Education with no evidence or insight to support any view of plan for this. There is also no clear provision for Secondary Education. There is no evidence or insight to support any view of plan for this. There is unclear information shared around Primary Education with no evidence or insight to support any view of plan for this.

For Secondary education, there are no details of the location of the land to be provided or suitability of this; just a suggestion to contribute to secondary education (without associated detailed timescales). There is not a number of Form Entries or details of the number of pupils the school would cater for. There is also no clear provision or funding for adequate Sports Facilities. The only available land being adjacent to the A4 with all its traffic and fumes. The provision of Secondary schooling is currently provided by the two catchment secondary schools are The Downs School or Kennet. Where the schools are oversubscribed, children are prioritised. The NE Thatcham children would therefore be prioritised for Kennet, removing the choice in this scenario. The proposal is therefore detrimental to our children and the future children of Upper Bucklebury.

	In conclusion, as a local resident I am extremely concerned about this plan due to the lack of detail, clarity and believ on myself and my family both now and in the future. Given my above objections, I find this plan to be lacking in robu
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sayers, Jonathan
Consultee Full Name	Jonathan Sayers
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1066
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to register my objection to the local plan review for housing on the north of Thatcham north of the A4 in t</p> <ul style="list-style-type: none"> • The trips rates used by WBC are unreliable and not robust. • The trip distribution is unrealistic (all evidence suggests traffic will be diverted from the A4). • The mitigation measures are improbable at best. • The location of site means car-borne travel will dominate. • Highway network in the vicinity of Thatcham north east is already over capacity. • No assessment has been made of the routes most likely to be affected by an increase in traffic. • Increase in traffic through Bucklebury will pose highway safety issues. <p>This location is wholly unsuitable for new housing and I reject it as a local resident.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Fenn, Anthony
Consultee Full Name	Anthony Fenn
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS789
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 19:43:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I object to the plan as I find it unsound.</p> <p>I question WBC's assessment that increased levels of traffic, road access and junctions and safe and sustainable tra on our area.</p> <p>On healthcare, it would appear that WBC and the developers have neither arranged for a relevant HIA nor have they appropriately liaised with local healthcare agencies or providers. All local healthcare practices are already overstret</p> <p>In the plan I can see no evidence to support claims that SP17 will have a positive impact on the environment. In fact see no evidence to seriously investigate and analyse the severe consequences of building too many homes on a gre</p> <p>The provision for extra schools to meet the anticipated demand is too vague and the amount of funding inadequate,</p> <p>I therefore believe that WBC should halt proceedings and bring forward a revised plan in line with proposed planning g due later in 2023.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Allum, Carissa
Consultee Full Name	Miss Carissa Allum
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS477
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 10:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>At the time of writing I am currently <i>[personal information removed]</i> and have lived in Bucklebury my whole life. I have been given the opportunity to grow up in such a beautiful area, and feel passionate that others in the future can experience the beauty that I will always associate with my time here. I feel that with the current research available, it demonstrates that it would not enhance the experience of young people in the future, but instead negatively impact the local area and the generations.</p> <p>The benefits of time spent outside have been widely reported in recent years, including improved cognitive function, sleep (Jimenez et al, 2021). The local area is a popular area for walking - something that I noticed increased during the pandemic supported by research (Bailey et al, 2022). Many people travel from local areas such as Thatcham up to Bucklebury to enjoy the Outstanding Natural Beauty (ONB) which is something that should be encouraged, but in a responsible way.</p> <p>As an owner of two dogs, the local common is used at least once a day for walking. There is a very friendly sense of community as they pass and the opportunity to meet with family faces. However, especially during the pandemic I have noticed that in people led to a large number of out of control dogs which posed a danger to other users of the woods and wildlife which is uncommon (Horse and Hound, 2022), and there have been multiple occasions where I have experienced potential danger from dog riding in the woods including dogs jumping up in front of us and aggressively running behind. Dog walking has also had a negative impact on wildlife (Lett, 2007). This is not to say that responsible dog walking should be banned, but the proposed plan that more people would lead to increasing numbers of dogs and walkers in this area wanting larger areas than “community parks” that this will not have negative impacts. The increase in litter in the local area has also been a regular point of discussion that can be worsened by more people.</p> <p>The vague mention of “community parks” as a plan to combat this is disproportionate to the amount of damage that will be caused. The plans focus on replacing the damage caused, but by the time the project has been completed the wildlife living in the area will have been displaced - including protected species such as the nightjars that breed on Bucklebury Common. Limiting numbers of people due to a sudden threat such as this development can also lead to a reduction in genetic diversity, leaving the species more vulnerable to reductions if an infectious disease becomes spread on a local level as they are unable to adapt to environmental pressures.</p> <p>The main problem is that the plan involves building in a green field area which provides a habitat for wildlife and some of the best use. These areas should be protected for future generations and brownfield sites are associated with having less of a negative impact.</p> <p>References:</p> <p>Bailey, D., Wells, A., Desai, K., and Kass, L. (2022) Physical Activity and Sitting Time Changes in Response to the COVID-19 Lockdown. <i>PLOS ONE</i> (online), 17 (7). Available from <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0271423> (Accessed 26th February 2023)</p> <p>Banks, P., and Bryant, J. (2007) Four-Legged Friend or Foe? Dog Walking Displaces Native Birds from Natural Areas. <i>Conservation Biology</i>, 21 (4), pp. 611–613. Available from <www.ncbi.nlm.nih.gov/pmc/articles/PMC2391219/> (Accessed 26th February 2023)</p> <p>Furlan, E., Stoklosa, J., Griffiths, J., Gust, N., Ellis, R., Huggins, R., and Weeks, A. (2012) Small Population Size and Genetic Diversity in Island Populations of the Platypus, <i>Ornithorhynchus Anatinus</i>, <i>Ecology and Evolution</i> (online), 2 (4), pp. 811–818. Available from <www.ncbi.nlm.nih.gov/pmc/articles/PMC3399204/> (Accessed 26th February 2023)</p> <p>Horse and Hound (2022) <i>Dog Attacks on Horses: Understanding the Dangers</i> (online). Available from <www.horseandhound.co.uk/news/dog-attacks-on-horses-understanding-the-dangers> (Accessed 26th February 2023)</p> <p>Jimenez, M., DeVille, N., Elliott, E., Schiff, J., Wilt, G., Hart, J., and James, P. (2021) Associations between Nature Exposure and Mental Health: The Evidence, <i>International Journal of Environmental Research and Public Health</i> (online), 18 (9), p. 4790. Available from <www.ncbi.nlm.nih.gov/pmc/articles/PMC8125471/> (Accessed 26th February 2023)</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1269
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	We do not demur from the view of TTC in respect of the following issues and will not repeat their reasoning:- <ul style="list-style-type: none"> • Status of the Thatcham Strategic Growth Study. • Deficit of Social Infrastructure for Thatcham.

	<ul style="list-style-type: none"> • Lack of Provision of secondary education and primary healthcare. • “Interim” Duty to Cooperate Statement. • Scoring system used in the Sustainability Appraisal: Appendix 5 SA/SEA of Strategic Policies for SP17 draws on evidence that does not appear to justify many of the ‘scores’ allocated, which seem to be ‘hoped-for’ scores not justified. There has been insufficient “appraisal” so far: not enough to justify such a large site being allocated such a large requirement. • Lack of clarity about why and how the size of the site was arrived at, both with respect to the numbers in the employment size in the longer term. It appears that this number does not seem to be evidenced and then efforts have been made to reduce the number as a result of local political pressure. • Deliverability of 1500 homes within the Plan period, based on experience with a similarly large site (Sandleford) supposed to start within 4 years of the site’s allocation (2012) but which is unlikely to deliver any units until 2020. • Availability of water supply and treatment, which links to deliverability. NET and Sandleford both require a major Lower Way treatment works and the foul sewer network leading to it. • Landscape Capacity Assessment. • Lack of definition of settlement boundary. • Inadequate and contradictory information on highways and traffic. • Use of “will” where “must” is strongly preferred (see elsewhere in the draft Local Plan, as explained by us in our evidence).
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	We agree with TTC that, for a variety of reasons under the tests for Soundness, SP17 fails on many issues as described (under Legally Compliant). We do not intend to repeat their argument, but on the basis that we agree with them, our sites within settlements or adjacent to them – including other sites within Thatcham that could between them deliver the same number as NET is currently allocated within the Plan period to 2039.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	As stated by Thatcham Town Council, on Healthcare there is lack of evidence that the primary healthcare authorities are not working together. Also the Duty to Cooperate Statement doesn’t convince us that National Highways, Thames Water, or Natural England are not working together.

	the submission premature in our view and this Council should not have agreed to authorise officers to submit Reg19 to authorities had responded.
4. Proposed Changes	Please refer to proposals by Thatcham Town Council, which we support in full.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We need to explain why we think the provision for infrastructure funding is so inadequate for NET. We hope that the relevant authorities will have supplied responses to the LPA by the time the Examination begins. Although we are largely led by the more detailed analysis done by Thatcham Town Council, this Group expects to have (independent) advice and resources than Thatcham Town Council.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS838
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	No

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy consultation point.</p> <p>SP17 – NORT EAST THATCHAM STRATEGIC SITE</p> <p>No Comment apart from there is much Evidence missing for this Strategic Site and many many hours have been put into robust responses to this proposal.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-A
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Howels, Tony
Consultee Full Name	Mr Tony Howels
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1020
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><u>Re: WBC LPR Regulation 19 Objection</u></p> <p>I feel obliged to make it known that I strongly object to the proposed North East Thatcham development of 1500 - 2500 homes. The local infrastructure will simply not cope well with such an outrageously large development and Thatcham town will struggle to absorb the extra demand that would be forced upon it.</p> <p>This is an horrendous proposal by WBC and a disgrace that WBC feel they can make such life changing alterations to the town without the concerns of the local people who live, work and enjoy it in its current form which is why we live here!</p> <p><u>Rail</u></p> <p>Thatcham railway station does not have enough capacity for parking to cope with the increase in commuter demand. The proposed development will create huge problems with access and egress.</p> <p><u>Countryside</u></p> <p>Destroying the beauty of the surrounding countryside and wildlife habitats, not to mention the pleasure locals get from the area would be outrageous! This beautiful area would be lost forever!</p> <p><u>Ground Water</u></p> <p>The local area has a history of serious flooding and while there have been improvements in the form of controlled grassland, this will all be compromised by such an obscenely large development.</p> <p><u>Potable Water</u></p> <p>The supply of potable water to the Bucklebury and Upper Woolhampton communities has been a huge problem in recent years. Upgrades inconsistencies still exist in the fluctuating water pressures.</p> <p>Can Thames Water even accommodate such a huge increase in demand on its water supply? The current pumping station is struggling with keeping up with demand!</p> <p><u>Sewerage Treatment</u></p> <p>The huge increase in sewage from such a large development will present the water authorities with a substantial head of steam for a new sewage treatment plan.</p> <p><u>Roads</u></p> <p>Harts Hill Road, North of Floral way, is not a road suitable for the expected increase in traffic with its many bends and narrow lanes. Travel along this section of road treacherous and dangerous particularly for pedestrians and cyclists. Further, there are no parking spaces on Harts Hill? Why?</p> <p>There will be an increase in traffic using Broad Lane between Upper Bucklebury and Chapel Row, currently a very narrow lane to avoid the A4.</p> <p>The increase in demand will also have serious consequences for Cox's Lane, Pease Hill, Carbinswood Lane, School Lane, Hill, Cod's Hill, Hatch Lane, Back Lane and all the narrow lanes around Upper Bucklebury all of which will become "no-go" zones.</p> <p>The development will also promote reckless abuse of the common on both sides of Broad Lane which are continuously used by reckless 4 x 4 drivers.</p> <p>The council are clearly unable to address the maintenance of the surrounding roads which are in poor condition and are being developed on a daily basis and this problem will become significantly worse!</p> <p><u>Pavements</u></p> <p>There are no adequate pavements or street lights on Harts Hill Road or Broad Lane in the direction of Cold Ash. With the proposed development this will present significant danger to pedestrians and cyclists.</p> <p><u>Public Footpaths</u></p> <p>There are footpaths that cross the proposed development which currently present pleasant walks, this will all be lost. The proposed housing estate will definitely not be a pleasant experience and most certainly will not have the same appeal!</p> <p><u>Schools, Nursery, Dentists and GP Surgeries</u></p> <p>There is currently no capacity for increasing the volume of children into schools or patients into Dental or GP surgeries.</p>

	<p>Wildlife</p> <p>What can be said about this other than devastating!</p> <p>It will be a very sad day if this beautiful countryside were lost to this outrageously large development and a fatal blow</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dobbins, Julian
Consultee Full Name	Mr Julian Dobbins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS874
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	01/03/2023 21:21:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to present my objection to the Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2036, specifically the Thatcham North-East development of at least 1500 homes on greenfield land, stressing that the plan is unsound and requires further consideration in its current form.</p> <p>I have been a resident of Upper Bucklebury for 17 years. I have objections that extend across many aspects of the plan. The focus of my assessment and submission focuses on the devastating environmental impact that policy SP17 will have on the area. My claims of a positive environmental impact have no basis in fact.</p> <p>Here are my main points of objection:</p> <p>(1) Transport: The LPR itself states there will be an increase in traffic "onto wider rural routes such as Upper Bucklebury". In congestion on the A4, it is a matter of near certainty that motorists heading east and seeking to avoid delays will avoid the A4 and head north to these rural areas, along with the increase in traffic heading north. This view is further supported by a traffic study conducted by West Berkshire Council which not only found West Berkshire Council's trip rates to be unreliable, but that the distribution of traffic is skewed towards the north, suggesting that the bulk of traffic will indeed seek to move away from the A4, not join it. In the LPR, there is a proposal for a new road which will undoubtedly increase the volume of traffic heading north still further - however, there is no modelling by West Berkshire Council on the evidence base - this is unacceptable in the public consultation.</p> <p>(2) Healthcare: Local health services (principally GP surgeries and dentists) are already under extreme pressure, with many services being closed or care outside the area. There is no evidence in the plan that provision of a new GP surgery or dental facilities will be provided. No local healthcare providers were consulted in the preparation of the plan.</p> <p>(3) Environment: This is where the bulk of my focus has been, trying to understand the plan as it relates to the natural environment. I will find (below) a significant and detailed assessment of the background documentation provided by WBC in support of the plan. My assessment shows that there is no evidence to support claims that SP17 will have a positive impact on the environment, both in the AONB and the surrounding area.</p>

By contrast, there is every reason (with supporting evidence) to believe it will have a significantly negative impact. R... environmental study' for further information:

Detailed environmental study

- Over 4000 people are being encouraged into the AONB

The LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green infrastructure 'advantage of the landscape' to 'facilitate connection to the AONB, and include leisure routes accessible to all users.'

Given the housing plan, this means over 4000 people

The management vision for Bucklebury Common (see below) is explicitly focused on not increasing human pressure. People are working to restore and nurture.

Species on the Common are already known to have been impacted by existing visitors, including cyclists, dog walkers and horse riders.

KEY POINT: SP17 provides a green infrastructure policy that is in direct opposition to the goals of the management plan for the management of Bucklebury Common.

- Development which is likely to have any adverse impact on the notified features of a nationally designated site [e.g. a Scheduled Monument] is not permitted.

The LPR states various reasons in which such development may be permitted (policy SP11, p45), including that 'all such developments have been proposed and secured through the development process'

KEY POINT: No mitigation measures have been provided as part of the LPR for SP17.

- Development proposals affecting sites of local importance should always seek to contribute to their favourable management. The LPR states (p46):

• Where a proposal is likely to result in harm to sites of local importance (including habitats or species of principal importance) that meet the criteria for designation as a Local Wildlife Site or designation as a Local Geological Site), developers will be required to follow the following sequential approach:

- Firstly, seek an alternative site in the District with a lesser impact than that proposed
- Secondly, if the first is not possible, demonstrate mitigation measures can be taken on site
- Thirdly, and as a last resort, seek appropriate compensation measures, on site wherever possible and off site where necessary for long term management and maintenance.

The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is also a Biodiversity Opportunity Area

- This is the land that the LPR intends to attract over 4000 people to visit through its green infrastructure

• This should be enough reason to feel the need to 'seek an alternative site' or 'demonstrate mitigation measures can be taken on site'

- KEY POINT: There are no mitigation measures described anywhere in the LPR and supporting documents – how is it possible for this to occur without the evidence to consider?

- There is no Sustainability Charter establishing how LPR requirements will be achieved

The LPR states that a Sustainability Charter is required to establish how 'policy requirements will be achieved' (including biodiversity net gains and the anticipated overall positive impact on environmental sustainability).

It states that this charter 'will be informed by' various strategy documents (including one on ecology)

KEY POINT: These strategy documents do not exist.

- The LPR's own Sustainability Appraisal states that SP17 will have a negative impact on environmental sustainability. The Sustainability Appraisal (SA) document which contains the assessment of the SP17 site and makes claims of positive impact.

• The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability which is not offset.

- KEY POINT: There is no detail provided on any mitigation measures.

• The same SA document states that the [SP17] policy is likely to have an overall positive impact on sustainability

The SA states that there is a 'high likelihood' of an overall positive impact on sustainability

The full appraisal for this is to be found in Appendix 5

- KEY POINT:

This is contradictory and confusing...

There is no evidence to be found in Appendix 5, merely the unhelpful inference that it will be positive because the policy is 'likely to have a significantly positive impact on biodiversity as it sets out more detail, but as an example: 'The policy is likely to have a significantly positive impact on biodiversity as it sets out more detail for the development'. And that's all it has to say on the subject.)

- The SA document also states both a 'neutral impact' and an 'unknown impact'

The SA states that 'overall development of the site is likely to have a neutral impact on all elements of sustainability'

- Sorry – we thought we were being promised an 'overall positive impact on sustainability' (even though there's no evidence to support this)

The SA states that there would be an 'unknown impact on environmental sustainability in relation to impacts on air, water and noise, but that 'measures would be able to deliver an overall neutral impact'

- KEY POINT:

This is even more confusing...

Appendix 5 (where the full appraisal is to be found) simply states that for each one (air, noise, soil, and water) the SA states that there is a 'neutral impact' on them. And, again, that's all it has to say on the subject – it's hard to believe that building 1500+ houses will have no impact on soil or air quality, especially when you are comparing it to a green field. Once again, the claims are spurious and unsupported.

- There is no masterplan for SP17

LPR (para 6.63) states: 'Further detailed work will be required to develop a coherent masterplan or development framework for the site forward, which will be produced in collaboration with the community and other stakeholders.'

- KEY POINT: The public consultation is underway now. The absence of detail relating to environmental matters around the site is just one more example.

- An Ecological Assessment is required in advance of obtaining planning permission for the development.

The LPR states (para 5.87):

- 'To demonstrate that development proposals have met the requirements of Policy SP11 [Biodiversity and geodiversity] by an appropriate ecological impact assessment (EiA) where this is relevant to the type of development proposed and the nature of the site and geodiversity interests.'

- 'The assessment should be proportionate to the scale and impact of the development...'

In the case of SP17, limited studies have been carried out by West Berkshire Council relating to the environment:

- 2018 Biodiversity Site Assessment (desk study) – see later for a comment on the quality of data

• Landscape assessment – this provides a limited view of the character of the landscape, and no information on the quality of the landscape.

- KEY POINT: There has been no ecological assessment.

• Biodiversity Net Gain (BNG) is a legal requirement

The LPR states (p46):

- 'All proposals should demonstrate a minimum biodiversity net gain of 10% via a Biodiversity Net Gain Plan using the accounting metric developed by Natural England and provide details of the long-term maintenance and management delivered on site in the first instance, or through biodiversity offsetting where appropriate.'
 - It also states that 'Major developments in particular must include measures to deliver biodiversity gains'
 - It states: 'Where there is a reasonable likelihood that a protected or priority species may be present and affected by surveys will need to be undertaken to provide the evidence needed to allow a determination to be made and license appropriate compensation measures should be provided where development would disadvantage the conservation of the site.'
 - And finally: 'To achieve net gain, a development must have a higher biodiversity unit score after development than before.'
- The data being used to establish the presence of species is out of date:
- In 2020, Bucklebury Parish sought environmental records for the 41 LWSs impacted by SP17:
 - 80% of surveys were conducted more than 15 years ago
 - 50% were more than 20 years old
 - 44% were over 30 years old
 - Bucklebury Parish appointed ecologists to conduct an independent study of the impacted area:
 - The findings from a single day walk on public access routes indicated that the site had a much higher biodiversity value than previously thought including the presence of seven species of threatened breeding birds and one threatened migratory species, several ancient woodlands, and a network of hedges, old trees and gullies serve as important corridors linking up different habitats within and beyond the site boundaries. The findings imply that a full study will show the required mitigation measures and BNG will be far more complex for the site than currently envisaged by the planners.
 - KEY POINTS:
 - This one study has provided more information about the site than has been presented in the whole of the LPR and the area has a higher biodiversity value than previously thought
 - Protected species are present and will be impacted – no detail on mitigation measures has been presented
 - Critical habitat network features are under threat from the development and will severely impact distribution of key species

SP17 Environmental Objections – Additional Detail

Damage to Bucklebury Common

As it relates to Bucklebury Common, specifically, consider the following:

- Bucklebury Common is one of the largest Commons in Southern England, containing the largest heathland in the South East. It includes the historic Avenue of Oaks at Chapel Row, notable ancient woodlands, and other important habitats. It is a part of the Bucklebury Plateau Biodiversity Opportunity area, and as such is considered to include 'important and rare habitats, one of the country's most important adder communities, and numerous other protected animals and plants.'
- Management of the Common is entering a new phase and has presented its vision for the enrichment and on-going management of this rare and precious environment. The management team for the Common includes Natural England, BBOWT, NWD AONB and along with members of the local community and ecological consultants.
- At a presentation of the vision to the broader community, it was acknowledged that the Common is an open area, and requires very careful management to protect it. It is a key part of the Bucklebury vision for the Common not to increase the number of people, but to place emphasis firmly on providing nature with a chance to restore itself and thrive, both in terms of the diversity and abundance of species.
- By contrast, the WBDC LPR is exclusively a human-centric plan whose green infrastructure is principally provided to encourage people to visit the AONB, and therefore the Common, causing disturbance to wildlife and adding an additional burden on the landowner through litter, fires and parking.
- Based on the housing mix described in the LPR, the proposed development represents an additional 4000+ people living near the AONB, which includes the irreplaceable habitats found in Bucklebury Common, with its ancient woodlands and heathland, ponds. The Common is already struggling to balance accessibility and leisure usage with the needs of the environment, with cyclists and dog walkers particularly impacting ground-nesting birds, notably woodcock, and other wildlife.

Greenfield Development in an AONB Setting

During the last public consultation, there was a significant number of objections based on the development's potential impact on the AONB. Berks responded to these objections by stating:

- 'In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development should be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the context within which any proposed development would need to conform. The LCA notes that whilst there is no statutory AONB on the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be added to the council's evidence base to inform the proposed allocation.'

The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development and management of the site.

With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' accompanied by accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters and other details.

KEY POINTS:

The development is in the setting of the North Wessex Downs (NWD) AONB. A landscape and visual impact assessment (LVIA) 'will be undertaken' – once again, there is vital information missing from the public consultation.

There is an expectation of a Masterplan – again, this does not exist.

It is our belief that the absence of any such detail at this stage displays an unacceptable level of complacency and is in breach of SP17, rendering the plan unsound.

The National Planning Policy Framework (NPPF - para 176) states:

- 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues'
- 'development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the setting'

KEY POINT: Development needs to minimise adverse impacts on the AONB

The North Wessex Downs AONB statement on development in the setting of the AONB states that 'examples of adverse impacts on the North Wessex Downs AONB include:

- development which would have a significant visual impact on views in or out of the AONB
- breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and / or prominent rooflines (e.g. blades for example)
- loss of tranquility through the introduction or increase of lighting, noise, or traffic movement or other environmental impacts
- associations and historic relationships
- introduction of abrupt change of landscape character

- loss of biodiversity, particularly of habitats or species of importance to the AONB
 - loss of features of historic and natural landscape interest, particularly if these are contiguous with the AONB;
 - change of use of land such that to cause harm to landscape character
 - development individually or cumulatively giving rise to significantly increased traffic flows to and from the AONB, resulting in erosion of the character of rural roads and lanes
 - Increase in air and water pollution.'
- KEY POINT: There is no evidence to suggest most of these adverse impacts would not happen – particularly loss of landscape character, and increased flow of traffic.
- NWD AONB did not oppose SP17 at Reg 18 stage, but they did express concerns, stating (p1092 in the Consultation Statement LPR Dec 2022 v2):
 - 'However, we would feel more comfortable if the parameters of the site and green open space were set in a masterplan that merely requests that the development positively respond.'
- KEY POINT: As noted throughout this document, there is no detail and certainly no masterplan.
- The previous plan for SP17 included an allocation of 2500 homes in the planning period. In the 'Consultation Statement LPR Dec 2022 v2', it states (p1091):
 - 'In response to the large number of objections to this site covering a range of issues important to local people, but particularly the impact of the proposal and the impact on local infrastructure, the Council has taken the decision to reduce the number of homes to allocate it for 1500 dwellings for delivery over the plan period.'
 - Despite this, the settlement boundary remains in the same place as the 2500 proposal. The consultation statement states: 'The settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst the plan will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham and North East Thatcham.'
 - It further states: 'As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it is not possible to set any tighter. As the LPR progresses and more detailed work is done on the sensitivity and capacity of different parts of the site, development the boundary will be amended accordingly.'
- KEY POINTS:
- The settlement boundary line has not been redrawn despite a reduction in housing number
- The stated reason for this is that the LCA does not contain sufficient detail to allow them to see the area as anything other than a landscape'.
- Until further landscape studies are carried out, it is impossible to know where anything will be sited based on the current plan. This level of detail, supposedly enough for the public to make its decision on whether to object or accept this proposal.
- Regarding the reduction from 2500 homes to 1500 within the planning period, there is no detail as to why 1500 homes was chosen over the original proposal of 2500. The Sustainability Appraisal / Strategic Environment Assessment (SA / SAE) sheds some light on what led behind the decision:
 - '[The option to develop 2500 homes] was originally to be taken forward and was included in the Reg 18 consultation statement. The number of new homes and community infrastructure to support these homes and the wider Thatcham community through the plan period is considered too high, and politically a reduced number on the site is considered to be more acceptable. The option will not be taken forward.'
- KEY POINTS:
- Despite acknowledging elsewhere the high level of environmental concerns expressed by the community, the decision to reduce the number of homes is based on political reasons.
- Once again, there is no evidence to suggest that 1500 homes is any more acceptable, in this case, from an environmental perspective than 2500 homes
- Until detailed assessments are carried out, documenting the existing environmental context and the measures that can be taken, the public is unable to make a decision in favour of this proposal.
- As mentioned previously, the detailed assessment concluding that SP17 provides positive impact on environmental sustainability is in Appendix 5 of the SA / SAE. The circular logic contained in this Appendix is perhaps the most confusing and profound in the entire SP17 proposal. It can be summarised as something like, it is positive because we've said it needs to be positive.
 - Appendix 5 contains a table which lists all the LPR policies, including SP17, and assesses how negative, neutral or positive each one is in delivering against key objectives. Here are some of the important ones relating to environment:
- Objective 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved
- Sub-objective 5a: To conserve and enhance the biodiversity and geodiversity of West Berkshire:
 - Response: The policy is likely to have a significantly positive impact on biodiversity as it sets out specific ecological measures to protect protected species and is adjacent to the fragile ecosystems of the AONB, and introducing over 4000 people into its immediate vicinity.
 - KEY POINT: There is no evidence anywhere to support this claim – how can building at least 1500 homes on greenfield sites have a positive impact'?
 - Sub-objective 5b: To conserve and enhance the character of the landscape
 - Response: 'The policy is likely to have a positive impact on landscape character as consideration of the landscape character is a key objective of the plan.'
 - KEY POINT: Much the same as above – greenfield versus housing estate? Neither common sense nor WBC evidence supports the claim that it is positive - for a document of this significance to state that it will be both disturbing and insulting, and further informs the public that it is not.
- Overall response to objective 5:
- 'The policy is likely to have a significantly positive impact on environmental sustainability as it seeks to conserve and enhance the character of the natural, built and historic environment.'
 - KEY POINT: There is no evidence to suggest it will have a 'significantly positive impact', and a lot of evidence to suggest otherwise.
- Objective (6): To protect and improve air, water and soil quality, and minimize noise levels throughout West Berkshire
- The sub-objectives for this objective relate to each part in turn – here, the author of this assessment shows some concern that the development is unlikely to impact air quality / noise levels / soil quality / water quality'
 - KEY POINT: The idea that the development of 1500+ homes is 'unlikely' to impact noise levels or soil quality is also not supported by a 1500-home housing estate.
 - Not only does the 'Local Plan Review Evidence Base' webpage contain insufficient information to support a public consultation, but the evidence provided relating to environmental matters is unhelpful and out of date.
 - The evidence base contains two sections relating to the environment:
 - Landscape – providing landscape character and its sensitivity to future development:
 - Landscape Character Assessments
 - Natural Environment - Information on ecology, biodiversity and nature conservation:
 - Link to Nature Conservation (not specific to SP17, but useful context about local environmental management)

	<ul style="list-style-type: none"> • A desktop study carried out by the Thames Valley Environmental Records Centre (TVERC) in 2018 • A link to further information on biodiversity areas in south-east England • Landscape <ul style="list-style-type: none"> This contains a link to a 2021 study on the North-East Thatcham site. • The study, carried out on behalf of David Lock Associates, states the following constraints: <ul style="list-style-type: none"> • The site has largely been assessed from publicly accessible viewpoints including the local road network, public rights of way and other publicly owned land. • Site photographs included in this study are representative of key views of the site. This does not represent a complete survey and no views can be gained. • Views from the surrounding countryside or urban areas have been assessed by noting intervisibility from within or on the site. This does not include an assessment of the potential zone of visual influence of any development on the site. • Study fieldwork was undertaken in late Spring / Summer, with deciduous vegetation in full leaf. • Assumptions have been made in relation to land use type, building height and form, to advise this sensitivity study. • place in preparing the Study. • KEY POINTS: <ul style="list-style-type: none"> No private land was accessed for the assessment The study was conducted in full vegetation, limiting visibility of the landscape (which was already limited by inability to access some areas) • Natural Environment <ul style="list-style-type: none"> The 2018 TVERC study ('BIODIVERSITY SITE ASSESSMENT FOR WEST BERKSHIRE LOCAL PLAN') found all sites to be of low (medium risk of adverse effects on biodiversity) or Amber (medium risk of adverse impacts) It states: 'We recommend appropriate survey work based on the results of the assessment for each site.' Nearly 5 years after the study was carried out, this has still not been done. Furthermore, the data used for the desk study will have been similar to the data obtained to support Bucklebury Park and its adjacent Local Wildlife Sites: <ul style="list-style-type: none"> • 80% of surveys were conducted more than 15 years ago • 50% were more than 20 years old • 44% were over 30 years old The survey states: <ul style="list-style-type: none"> • 'Up to date ecological surveys are needed to establish current site conditions and the presence of any protected species, sites or habitats are present on the proposed development site, avoidance and mitigation measures must be implemented to achieve the lowest impact scores, as the most suitable for future development, are good targets for future survey work. Development should be subject to ecological survey and implementation of appropriate mitigation where practical. Any development that would affect a Local Wildlife Site should be subject to Natural England to be first consulted.' • 'Sites that have a high opportunities score should be prioritised for the improvement of biodiversity, habitat connectivity and the creation of nearby Local Wildlife Sites.' • KEY POINTS: <ul style="list-style-type: none"> • Further work is required. • This was a desk study - an Amber site can easily be more appropriately identified as a Red site once the site is accessed. <p>As stated above, and with all these points as evidence, I urge you to withdraw the SP17 policy - it is unsound, poorly evidenced and does not reflect given recent Government comments about housing numbers needing to be flexible and must 'reflect local circumstances'.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Phillpot, Adam
Consultee Full Name	Mr Adam Phillpot
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1133
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 15:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I have set out my objections to this development below (WBC LPR Regulation 19 Objection - SP17). These are categorised as follows:</p> <p><u>OBJECTIONS TO THE NORTH EAST THATCHAM DEVELOPMENT</u></p> <p><u>1. Historical Concerns</u></p> <p>The proposed development is in close proximity to known archaeological sites :</p> <ol style="list-style-type: none"> a) the Iron Age community at the top of Harts Hill and Cold Ash ridge b) Romano British sites which are likely within this area. Silchester is a major Roman site with extensive local links with the surrounding area c) the medieval farms and communities of Newbury Castle and Reading Abbey which extended throughout this area d) the civil war battle fields of Newbury and skirmishes from Thatcham and neighbouring ridgelines <p>It does not detail the archaeological mitigation strategy and methodology to be employed for archaeological monitoring of the development. The proposal is wholly inadequate and does not set out how the site will be investigated for historic features and what would be taken in the event a site was found.</p> <p><u>2. Sites of Special Scientific Interest</u></p> <p>The proximity to sites of special scientific interest. I know that Big Gully near Upper Harts Hill farm until recently was designated as a site of special scientific interest. Whilst SSSI's as a designation has lapsed the reason for this designation has not. Any and all development near these sites the flora and fauna are not disrupted. Building work inevitably involves pollution and therefore must not be allowed (Traffic, light, noise and people [both building works and then residing in the building]). This also applies to all the gully's that cross the Kennet these are the only natural corridors that allow wildlife to migrate safely.</p> <ol style="list-style-type: none"> a. There is nothing in the plans which set out how these gully's are to be protected to ensure that the flora and fauna are not disrupted. <p><u>3. Proximity to an Area Of Outstanding Natural Beauty (AONB)</u></p> <p>Like world heritage sites AONBs do not have a hard edge there is a blurring between what is the natural boundary and what is not. To the South of Upper Bucklebury are clear examples of where the natural boundary lie and the natural ecological succession extends considerably into the adjoining fields. The natural boundary of the AONB should be considered rather than the hard edge of the AONB.</p> <ol style="list-style-type: none"> a. This development is urbanisation of the countryside and therefore should not be in close proximity of the AONB. The development that would constitute urbanisation within 1 kilometre of an AONB. <p>(Many County Councils have clear guidelines for developers on what is allowed within an AONB and then within 1 kilometre. I cannot find any such guidelines on the West Berks Council website.)</p> <p><u>4. Urbanisation of the Countryside</u></p> <p>The scale of this development makes it unequivocally urbanisation. Roads and houses will be built on open countryside. This is in breach of Government and West Berks own guidelines – indeed they recently refused a development near Cold Ash on just this basis. This development is being supported by the local council as it clearly is urbanisation of the countryside and should be refused.</p> <p><u>5. Nature Under Pressure</u></p> <p>Bucklebury Common and the adjoining woods of Hartshill Copse, Burdens Heath Plantation, Blacklands Copse, Long Copse, Big Gully, Kents Down Gully, Ouzel Gully the intervening fields and the openland abutting the woods are a haven of nature in the South of England. They are the environment of rare and common species – I personally have seen rare bats, birds and insects. The area is a haven of native mammals enjoying the tranquillity of life without human interference here. (I am sadly no expert on flora and fauna but an ornithologist and have some knowledge of mammals). In the summer sky larks nest and fly above the fields surrounding the area. I have seen Roe deer stags bask in the sun in the fields beside Blacklands and the does, fawns and stags feed in the fields adjoining all these woods. Nightingales sing in the evenings in Long Grove Copse and Night Jars reside nearby on the banks of the Midgham and Cold Ash woods. In winter there are significant migrant bird populations moving through the area including Starlings as well as rarer birds such as Goshawks. This is an extraordinary environment that needs protecting from people and being relatively unknown and going below the radar of more famous nature reserves.</p> <p>The absence of people is key to its continued success and the pressure this development will place on this vulnerability.</p> <ol style="list-style-type: none"> a. The proposed development will destroy the natural corridors across the Kennet Valley and a proper protection plan should be drawn up. b. The number of people residing in the development will inevitably lead to the environment being used for leisure activities for walks leading across the spaces and woods disrupting the natural balance and ecology. These are natural spaces and a human park is not a space created by nature but one for humans to enjoy. The plan clearly thinks they are one and the same. A proper mitigation plan which excludes humans from these spaces needs to be drawn up.

	<p>c. To ensure that the natural balance of the area is maintained any development needs to be at least a kilometre away from woods.</p> <p>6. Social Concerns</p> <p>Thatcham today has significant social issues (unusually high for the South of England) adding significant housing to additional social infrastructure is difficult to understand. If education, health (medical and dental) are inadequate today. Education, nursery, pre-school, primary and secondary appear to have been largely overlooked as there are no social education provision seem inadequate for the population. The proposal also no longer includes provision for a social also no provision for additional police, social service and medical staff.</p> <p>a. These are clearly costs of the development but are not included here.</p> <p>b. The traffic disruption will mean that Thatcham retail economy is severely impacted as West Berkshire shoppers go</p> <p>7. Personal Concerns</p> <p>I am also concerned that as a resident of Upper Bucklebury that this development will disrupt our lives significantly.</p> <p>a. The amount of traffic going through Upper Bucklebury will increase considerably and our own journeys to Thatcham - what plans are there to ensure that this cannot happen?</p> <p>b. The disruption to journeys to Thatcham and Newbury will be severely disrupted whilst building work is on going (a access to hospitals for us as well as retail opportunities. How will this development ensure that access is not disrupted</p> <p>c. The value of property in Upper Bucklebury will be impaired by the proximity of this development. What reparations and WBC to me?</p> <p>d. My own walks and rides will be severely impacted as I will no longer be able to watch the wildlife in the fields adjacent development. How am I</p> <p>I hope these points are clear but if anything is unclear please do not hesitate to contact me.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Goodall, Andree
<p>Consultee Full Name</p>	Andree Goodall
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS730
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am objecting to the plan as I find it unsound <ul style="list-style-type: none"> I have lived and worked in the Newbury area all my life <i>[personal information removed]</i>

- The proposal to build 1500- 2500 -houses (4000 additional people estimated) in NE Thatcham has the potential of having a negative impact on my life and that of my family who also live in the Newbury area.
- This proposal is not positive for the environment and potentially will cause further environmental issues to this area in some time.
- The following areas are my main concerns :-
 - Currently I understand Thames water are allowing raw sewage at peak times to flow into our water ways I believe this will affect residents (4000 estimated) will only increase the burden on the current water treatment facilities. I feel very sorry for them they need cleaning up rather than making them worse.
 - Now that I am a pensioner my health becomes more prominent . 13 years ago when we moved to Upper Bucklebury and myself had to move from Thatcham health centre to Chapel Row Surgery because THC didn't have enough space in the area. Whilst I have been very happy with the chapel Row surgery and they do provide a first class service but it is stretched. I am concerned this plan will cause a significant decline in the level of service provided at time of need. It is also noted that whilst they provide an excellent prescription service there is a lack of chemists in the area outside Thatcham Health centre.
 - I often take and pick up my grandchildren from schools in Newbury. in the morning recently traffic congestion was bad I believe this situation will deteriorate under this plan.
 - Increased traffic congestion along the A4 will increase traffic through villages and minor roads causing safety issues for pedestrians and horses.
 - The local infrastructure is not geared for this increase in houses and residents and I do not believe there is enough to meet the additional needs of residents in terms of doctors surgeries, schooling, chemists, sports facilities etc.
 - The area proposed is an area of outstanding natural beauty enriched with all species of wildlife that I have been enjoying for many years.
 - Newbury town centre is sadly in decline with shops closing down and leaving the area I believe a factor is the increase in traffic this development will improve the town centre with further traffic congestion it is likely to cause less people to visit and the area will get worse.
 - The scale and location of this development is disproportionate for the area it will be an overburden to existing services and segregation of Upper Bucklebury and its identity as a village with a significant increase in traffic

For the above concerns with no evidence of these concerns being unfounded I find this plan unsound

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Monk, James Richard
Consultee Full Name	James Richard Monk
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS942
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I have been a resident of Thatcham and Upper Bucklebury continuously for over 50 years. I strongly object to the TH because I believe it to be unsound, for the following reasons.</p> <ul style="list-style-type: none"> • Healthcare provision - current GP and Dental surgeries are already full. There is no provision for expansion of cur New housing will manifestly increase demand. As an older resident, I am concerned we would experience even m in my later years. • Environment - hugely important. This is a rural, farming community. Crops grown here feed the people; the land s for that very reason alone. More housing built on these nutrition-producing fields will intrinsically decrease yield community to feed the nation. • Transport - because of the very significant increase in volumes of cars etc., any development must not allow v with all the roads in our part of the village, our lane in Upper Bucklebury is narrow, rural and has no pavement increased traffic funnelled through via access from Harts Hill. Any upgrading of the roads/lanes would downgrad 'Safe travel' would only be achieved by destroying the countryside around. • Education - more housing equals more school places needed. However, numbers of Pupils are crucial. Exactly built, it's not clear. Funding - is this sufficient to provide the legally obliged level of education the government d • Leisure activities in a rural area - walking, running, riding, bird watching, flora & fauna observation and immers the inevitable creep of urbanisation progresses up the hill to Upper Bucklebury and the other villages. • I therefore ask that the council allows opportunity to consider the government's updated planning guidance, to
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Woodhead, Richard
Consultee Full Name	Mr Richard Woodhead
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS726
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to comment on the above and the proposed large housing development in Thatcham towards Upper Bucklebury.</p> <p><u>Traffic increase:</u> Living in Chapel Row I am particularly concerned that this proposed scheme is well over the top in terms of a large increase in traffic through Upper Bucklebury, Chapel Row and Bradfield Southend. Harts Hill Road is a twisty road around Upper Bucklebury/Chapel Row/Bradfield etc. These roads are already busy and the road network and junctions are not suited to what will inevitably be a big increase in traffic. Heaven forbid if the development is allowed to proceed, as by the urbanisation of what is currently a special rural area of "outstanding natural beauty" and it's not unreasonable to propose a number of new or enlarged road junctions, pavements or even heaven forbid street lights. We have in the area something of a rural idyll and to place such a large development on our doorstep will inevitably change what is essentially a pleasant rural area, and a creeping spread of the concrete jungle.</p> <p><u>Healthcare:</u> The surgery at Chapel Row would seem to be already incredibly busy and fully stretched and would struggle to cope generally in the area are already incapable of taking on what would be a large additional burden of potential patients. There has been no meaningful consideration of the impact that such a large development would have on the existing healthcare. It is very poor planning for the future and a prescription for major problems in healthcare in the area which is already at full capacity.</p> <p>The news in the last few days regarding Bicester council scrapping plans for a super surgery only goes to emphasise the need for a considerable increase in housing in their area it has apparently not been possible to negotiate NHS funding and will have a negative impact on the local hospitals in that area. I suspect the RBH and other hospitals in this our area are already fully stretched, and this Thatcham development will be a healthcare car crash waiting to happen.</p> <p><u>Environment:</u> Whilst it is appreciated that an increase in the housing stock is needed throughout the country, it is so close to expansion so close to so many rural communities and an AOB. The AOB will not be an AOB if there is a persistent and increasing pressure which inevitably have a deleterious effect on the local environment and wildlife. We must surely do what we can to protect our wildlife in general which is already under pressure.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tate, Denyse
Consultee Full Name	Denyse Tate
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS507
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 15:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan to build 1500-2500 houses in NE Thatcham as I find it unsound and it will have a negative impact on the health of the community.</p> <p>The proposal for a major development is likely to have a significant health impact due to its size and location. It should have a purpose Health Impact Assessment (HIA) in accordance with the Public Health England current guidance. Neither V&A nor the Council have arranged or published a prospective HIA for the NE Thatcham development regarding impacts on primary health care.</p> <p>There are few new GP practices commissioned by NHS England even in areas where there is a demand for improved primary care. The prospect of a new GP practice being established in Thatcham or West Berkshire in the future due to there being shortages of GPs in the country. Due to a lack of GPs and nurses, I believe staffing a new practice would also present a problem. There are currently 12 weeks for an appointment at my practice. Adding up to 2500 houses will only increase this waiting time. The objective of the health service component of the community has not been met as WBC and NETDC have not provided evidence for a new primary care medical facility.</p> <p>There is also a shortage of dental practices, and I have had to register with a practice in Newbury. The proposed development will reduce the number of existing practices.</p> <p>The provision for education is not clearly defined within the LPR. There is no coherent end-to-end plan, therefore the Council is unable to provide educational facilities for children, leaving the plan for a large housing development untenable.</p> <p>There are no details in the plan for the provision of Nursery/Early Years education and the provision is unclear and of poor quality age education, with no planned numbers of schools or entry requirements.</p> <p>The plan for secondary education is unsound as there is no satisfactory evidence of the number of pupils the schools can accommodate, unclear, no clear timing of the funding and no evidence that the proposed funding is sufficient to meet the Council's duties. It is known that universities are struggling to recruit applicants for teaching degrees which will have a long term effect on the education system. The Council has a duty to make arrangements for suitable school provision and how this is to be achieved is not evidenced in the plan.</p> <p>No evidence is provided for a suitable location or evidence of funding to provide sports pitches. In a world where we have indoor sport and away from digital gadgets, this kind of provision is paramount.</p> <p>The proposed development will have a detrimental effect on traffic and pollution in Thatcham due to a high increase in new houses. The roads are already congested and the Thatcham railway crossing has significant issues of congestion, noise and fumes. Building up to 2500 homes will exacerbate these problems with traffic likely to reach the A4 between Newbury and Thatcham will force traffic onto the smaller roads through the local villages.</p> <p>The development would take up valuable green space on the brink of Thatcham, denying the community of exploring the area of Thatcham. It will impact the local wildlife by removing a huge area of green space, hedgerows which provides habitats for many species. It will increase pollution as well as increasing light pollution for the woods that the proposed development borders.</p> <p>Over recent years there has been a substantial amount of investment in flood prevention, including Harts Hill. The development will result in no natural drainage and therefore increasing the likelihood of flooding. Floral Way already has a long history of flooding periods of rain and this will only increase with a large development.</p> <p>It is for the these above reasons (amongst many others) that I object to the unsound proposed development of 1500-2500 houses in NE Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Woodhouse, Toby
Consultee Full Name	Toby Woodhouse
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS821
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 21:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to this proposal as I believe it is unsound, that it will have a negative impact to the environment and potential road safety implications.</p> <p>We outline our objections below.</p> <p>Environment (AONB SP1 & SP 2) – the proposed development abuts Bucklebury Common and the North Wessex Downs AONB. The proposed new developments will be drawn to the Common and will significantly increase the pressures already evidenced by the existing and existing wildlife. Parking on and around the Common is already exceeding capacity, with verges being used during peak times. The development is relatively close, not all residents will walk/cycle to the Common they are more likely to drive. The open spaces proposed in the development areas will not be big enough or as appealing as the Common land within the AONB.</p> <p>The response that "<i>The development would involve a significant amount of open space which would be expected to be used for sustainable development (and benefit the existing population)</i>" does not address the concern that an existing mature and diverse Common green area within a housing development for dog walkers, cyclists, off-roaders, etc.</p> <p>Wildlife (SP11) - the impact on local eco systems and wildlife will be significant. Whilst plans identify mitigating actions for sustainable development it is quite clear that this development of farmland and natural open habitat will destroy areas of wildlife. The open spaces proposed in the development areas will not be enough either for the wildlife or the residents. The development is inevitable, will also impact wildlife on Bucklebury Common and the AONB.</p> <p>The response that "<i>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council has stated that the development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) for the AONB and which will provide the context within which any proposed development would need to conform. The LCA concludes that there is no strong inter[1]visibility between the site and the AONB it does lie close to it and concludes that the site is not visible from the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation of the AONB.</i>" does not address the impact of bulldozing existing mature farmland, building and laying tarmac.</p> <p>Being "<i>landscape-led</i>" is a not a sound argument when you've squashed all the wildlife and the songbird, bee and butterfly and return in a 2-3 generation when we're being asked to protect our Countryside for future generations.</p> <p>Traffic (SP17, SP22) - Thatcham is already a bottleneck for traffic flowing through the town on the A4 between Newbury and Reading. A new road network with the proposed traffic calming, traffic lights and roundabouts, the impact of on the flow of traffic above will have a knock-on detrimental effect on the local roads and quiet lanes in Bucklebury as the additional cars a day will create chaos in and around Thatcham and the associated A4 area. The local lanes and roads which are designed with layout for only local traffic will be used as short cuts through to Reading, Newbury and the M4 to avoid the A4 congestion. We note the proximity of the proposed developments to Thatcham Railway Station. The ability to get to the station at peak times is a concern. While we appreciate the plan places an emphasis on sustainable travel there is no requirement for residents to complete their journeys on pedestrian routes may be included and built by the developers but in poor weather, the dark winter months and for commuters with their cars and further impact on the already congested road network.</p> <p>There was no response to our Objection and we have subsequently found out that there is a plan for an undisclosed road onto Harts Hill which connects Upper Bucklebury, Cold Ash and Bradfield indirectly to Thatcham.</p>

They also provide access to the M4 at Chieveley and Theale and act as a "rat run".

Cold Ash has no footpaths and a School where cars regularly park in the road and children are offloaded - this is unsafe. There are small Villages on B-roads which are in poor repair and are lined by Schools i.e. Cold Ash, Upper Bucklebury, Bradfield

Flood Risk (SP6) - Recent flood alleviation works to the North of Thatcham have been put in place to protect houses in the areas most severely affected by the 2007 flooding event. The events will only increase. Whilst there are proposals for surface water down into the valley (SUDS) they are not designed to support the heavy volume of water from such a development. In extreme weather events which it is recognised will only increase in frequency and intensity, SUDS will simply release the flood management scheme adding pressure on it and increasing the risk of Thatcham flooding again.

The response that **"In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures are being developed. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way, part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP."** This all sounds good but they are tested who knows if they will work. Thatcham flooded in 2007 largely because of the relatively small development on significantly larger and on higher steeper ground.

Pollution – the development will generate significant levels of light pollution again impacting on wildlife and the ecology of these natural pleasures away from the area. Notwithstanding the effect for local residents on their night sky.

Pollution - the volume of homes and associated transport requirements will generate increased pollution from carbon dioxide associated with population density. The clean air experienced on the Common and the AONB currently will be a thing of the past.

The response given does not address our concerns, the street lighting you can control is one aspect, Domestic lighting (in the season) are beyond your control. Cars and central heating fumes are also beyond your control.

Rail - While Thatcham railway station is within a reasonable distance of the proposed sites there is no capacity for additional parking. There is no reference to any consideration around improving the infrastructure networks around the railway station. The creaking system will be overwhelmed and fail. The trains currently stopping at Thatcham are governed by the length of the platform. Additional trains will require a further platform extension and will require the level crossing to be closed for longer periods.

Our Rail concern is not addressed in the response however the issue of increased traffic is recognised **"TA report a concern has been raised that the proposed development would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the increased traffic. Some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation measures used do show significant impacts along the A4 and Floral Way"** - it's impact is recognised but not adequately addressed.

"Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure is not supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the IDP work has been taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with providers"

Medical - Medical services in Thatcham Bucklebury Cold Ash Chapel Row and Bradfield Southend are already under strain. New services are included in the proposed scheme (GP surgery) however there is no obligation for these services to be provided. The need for more housing of the housing. Indeed, we believe these will wait until the demand reaches a specified level. In the intervening period existing surgeries and services already at capacity. We wonder how and when the NHS will be engaged on these proposals. The influx of thousands of families who will expect schools GPs and hospitals to take care of them.

Our concerns have not been addressed.

The provision of medical services is not within the gift of the Developers, only the NHS and ultimately the Department of Health can control the funding for GP Practices and Dentists. These are over-subscribed in Thatcham and the surrounding districts. There aren't the Doctors, Dentists or Healthcare Professional to staff them. Don't build a future problem for existing residents that will present itself.

Observations

These still stand, Thatcham remains a small town that has little or no investment over the years.

By granting permission for this development the local authority is again devolving its responsibilities by placing the burden of infrastructure onto others. Before West Berkshire Council considers further development in Thatcham it should first consider its commitment to invest in the area. Without this WBC will continue to face strong opposition to applications that seek to develop significantly while anticipating the infrastructure and investment will be made by others in their own timeframes.

	<p>The response to our earlier submission does not reassure me, quite the contrary.</p> <p>The new undisclosed northern access from the development to Harts Hill and Upper Bucklebury giving cars access to avoid the congested A4 fills me with dread...</p> <p>We are opposing the North East Thatcham Development Proposal THA20.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Weston, Paul
<p>Consultee Full Name</p>	Paul Weston
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS977
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	01/03/2023 12:04:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish Objection to the proposal to build 1500 – 2500 additional homes on the proposed site to the North East of Thatcham</p> <p>The grounds for objection are as follows -</p> <p>1) Environment based objections</p> <ul style="list-style-type: none"> • on the area of outstanding natural beauty both visually but also from noise, and pollution • a loss of green space • impact upon trees and will result in loss of mature trees, • impact on local wildlife and the biodiversity of the Bucklebury Plateau. <ul style="list-style-type: none"> • There will be a negative impact upon – • In time when food security is of paramount concern the use of valuable farmland for housing flies in the face of • There will be a potential coalescence of Thatcham and upper bucklebury with the strategic gap being lost or reduced • Quality of environment will be diminished, and pollution will be increased • In times of global warming the carbon footprint of this development will be enormous, from all the traffic, the many cars travelling to the site, and the digging up of the ground, this development will add to global warming. • The loss of the grass land, hedges, trees, which are a huge carbon sink will be lost and carbon will be released into the atmosphere contributing to global warming <p>2) Community based objections</p> <ul style="list-style-type: none"> • The community benefits of the scheme have not been fully explored and any suggested benefits are not sufficient • Whilst local facilities such as Doctors Surgery may well be provided these will not be staffed as the current GPs are overworked and under strain on health facilities • There will be additional strain on police facilities and policing in the area and no plan for this has been detailed • There will be additional strain on additional strain on dental facilities in the area and no plan for this has been detailed

	<ul style="list-style-type: none"> • There will be an impact on local safety especially with the increase in traffic using the harts hill/common road t • There will be significant noise during construction, • There will be an increase in light pollution in the area affecting the wildlife and local people • There will be an additional strain ton power supply and no real plan has been detailed on how to deal with this • The development will have a detrimental impact upon drainage capacity and no detail has been provided ton h <p>off will be dealt with,</p> <p>3) Traffic based objections</p> <ul style="list-style-type: none"> • There will be an increase in volumes of local traffic generated by this development, even if as the documents s (a minimum!) this will mean at least 3000 additional car, journeys each day (assuming one car per house hold rural area have 2 cars), if the volume of houses are at the higher estimate of 2500 homes built this will mean a journeys a day (2500 homes with 2 cars each doing 2 journeys each day) this will result in unacceptable impac and at peak times in particular. • There are no retail provisions proposed, creating additional traffic to travel off-site to a shop. • There is a significant risk of vehicles being backed up, with queues already at Thatcham Train Station backing additional passengers could exacerbate this. A bridge is required before homes are built. • Traffic in Floral Way at peak hours can already result in 15–20-minute delay with frequent queues from roads in Way • The A4 is not designed to take the volumes of traffic it currently does, and therefore cannot cope with additional t • No matter what WBC/developer say the common road through Upper Bucklebury, and Bradfield Southend will exacerbated by the traffic backing up on the A4 and drivers seeking an alternative route through the villages on n of traffic. • There is not enough local employment for future occupiers of this development, and which will require people v work locations adding to traffic problems <p>4) Flooding based objections</p> <ul style="list-style-type: none"> • The Risk of local flooding remains very high and will have local and strategic implications. The new developme upon local greenfield drainage rates which will impact on potential future flood events on existing housing "dow water catchment • The technical aspects of the scheme have a number of real shortcomings which, if implemented, will still mean for the existing homes and proposed homes. . • Flooding risks and the Thatcham Flood Forum of 2014 indicated that Thatcham should be 'ruled out' for large s water emergence; • The flood event of 2007 affected over 1000 houses, with a volume of water coming from the north of Thatcham not coping with the volume of water. More houses in this location will add pressure to that siphon <p>5) General objections</p> <ul style="list-style-type: none"> • The planning process as this is being manipulated by Developer to their own advantage and the council are co to manipulate this process. By the very fact that the developer has paid in excess of £100,000 for the planning adopted lock stock and barrel is clearly bias towards the developer. • I would also question whether the above is lawful and WBC should produce evidence that says this approach i • The councils planners are being lazy allowing this plan to be proposed, there are numerous sites especially br around west Berkshire that if allowed for development would spread the development across many areas and communities and the environment.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Grey, Barbara
Consultee Full Name	Ms Barbara Grey
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS829
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write because I believe the LPR Regulation 19 is unsound, I document my reasons to maintain that it is not "Justified".</p> <p>1 West Berkshire Council has a 'Duty to Co-operate'.</p> <p>This surely means that local parishes and adjacent landowners should be consulted, or at least informed when such matters are considered. Since approximately 800 metres of our boundary abuts the proposed new development, I would have expected the officers of West Berkshire Council to have contacted us.</p> <p><i>[personal information removed]</i> The western boundary of our land is a stream which abuts the eastern boundary of the proposed Development.</p> <p>This stream feeds into the River Kennet, one of the few remaining chalk streams in southern England.</p> <p>The farm consists of land to the west of Cox's Lane and land to the east of Cox's Lane extending along Birds Lane to the east.</p> <p>We have lived here for 29 years during which time we have revitalised the soil following years of arable mis-use. We have removed pesticides and chemicals, replaced arable fields with wild flower meadows, planted several kilometres of new hedgerows, properly spaced and maintained hedgerows and planted new woodland. We are recognised for this care by being a farm under the Higher Level Stewardship scheme.</p> <p>Our careful management of this land has resulted in a considerable increase in its biodiversity.</p> <p>1 Impact on Ecology and Biodiversity</p> <p>Even though it is our land that is most at risk of damage to its biodiversity, no one from WBC Planning Department has ever visited to assess the presence of flora and fauna on the land abutting the development. I understand that the data used to justify the proposed biodiversity of the proposed site and its immediate surroundings is in most cases more than 15 years old and almost certainly out of date. This means that no account has been taken of the increased biodiversity we have established whilst <i>[personal information removed]</i> the land has been under our stewardship. It is obvious that any development on the sloping land to the east of our stream will have a negative impact on the flora and fauna nurtured during our tenure. Any mitigation WBC might propose can do nothing to protect these vulnerable species. To suggest that the development will have a positive impact on the environment is just nonsense.</p> <p>This LPR subsumes part of Midgham Parish on its Eastern boundary. No consultation has taken place regarding the impact on the Settlement Boundary.</p> <p>The negative environmental impact of the proposed development is clearly of most concern to my husband and I as our land is adjacent to the development. I list below further reasons for my objection to this proposal.</p> <ul style="list-style-type: none"> * Other proposals, some on brownfield sites, have not been given proper consideration. Particularly the Croudace proposals to replace the level crossing. The traffic jams caused by the level crossing increase year on year and a bridge would be a much better solution. * Consultation documents provided in favour of this development were paid for by the developers. * Insufficient consideration of the development's impact on the local landscape and the AONB. * Disregard for the need of "Defined Gaps" between Thatcham and surrounding villages. * The number of houses to be built has been reduced from 2,500 to 1,500 and yet there has been no reduction in the overall impact on the environment. * No consideration has been given to the likely increase of traffic on Cox's Lane which will become a "rat run" up to the development. * WBC has provided an oversupply of houses in recent years and yet it has chosen to ignore Michael Gove's statement that councils should be likely to reduce the overall housing requirements for councils. Many councils have chosen to pause the progress of new housing. Has WBC not done the same? * No consultation has taken place with local GP practices regarding the increase in need from an extra 4000 people moving to the area. * An earlier planning permission for a development at Siege Cross was refused. What has changed. * Why is the LPR not being reconsidered by the full council prior to the final submission to The Secretary of State? <p>I do hope that my real concerns over the unsuitability of this proposal will be seriously considered and that a complete ban on new building on farmland, will be forthcoming.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	If invited
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Goodall, Brian
Consultee Full Name	Brian Goodall
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS731
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
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<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan as I find it unsound</p> <ul style="list-style-type: none"> • I have lived and worked in the Newbury area all my life <i>[personal information removed]</i> • This proposal is not positive for the environment and potentially will cause further environmental issues to this some time. • The following areas are my main concerns :- • Currently I understand Thames water are allowing raw sewage at peak times to flow into our water ways I believe residents (4000 estimated) will only increase the burden on the current water treatment facilities. I feel very sorry they need cleaning up rather than making them worse. • Now that I am a pensioner my health becomes more prominent . 13 years ago when we moved to Upper Bucklebury and myself had to move from Thatcham health centre to Chapel Row Surgery because THC didn't have enough space in the area. Whilst I have been very happy with the chapel Row surgery and they do provide a first class service which is stretched. I am concerned this plan will cause a significant decline in the level of service provided at time of need. It is also noted that whilst they provide an excellent prescription service there is a lack of chemists in the area outside Thatcham Health centre. • I often travel from Upper Bucklebury to Greenham common to help my son with his business and if I travel by bus to cross the Thatcham railway crossing, increased traffic using this route will cause even longer delays. This is a concern. • I use a bicycle to go from Upper Bucklebury to Greenham when I can, but the cycle lanes are either non-existent or poorly maintained, increased traffic on this route will make my journey less safe if not dangerous. • I often take and pick up my grandchildren from schools in Newbury. in the morning recently traffic congestion on the A4 is so bad I believe this situation will deteriorate under this plan. • Increased traffic congestion along the A4 will increase traffic through villages and minor roads causing safety concerns for pedestrians and horses.

	<ul style="list-style-type: none"> • The local infrastructure is not geared for this increase in houses and residents and I do not believe there is to meet the additional needs of residents in terms of doctors surgeries, schooling, chemists, sports facilities • The area proposed is an area of outstanding natural beauty enriched with all species of wildlife that I have b • Newbury town centre is sadly in decline with shops closing down and leaving the area I believe a factor is or this development will improve the town centre with further traffic congestion it is likely to cause less people to worse. • The scale and location of this development is disproportionate for the area it will be an overburden to existing segregation of Upper Bucklebury and its identity as a village with a significant increase in traffic <p>For the above concerns with no evidence of these concerns being unfounded I find this plan unsound</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dobbins, Sue
Consultee Full Name	Sue Dobbins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS875
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to object to the Proposed WBC Regulation 19 Local Plan Review (LPR) 2022-2039, specifically the NE TH it is unsound and lacking in supporting evidence. You state on your home page for the LPR under Support Evidence by a robust evidence base' but I do not think there is sufficient robust evidence to prove that the plan is sound. I have referred back to my previous objection under the Regulation 18 consultation and I am convinced that the response is flawed and lacking in evidence:</p> <p>1. In response to my objections on the environmental impact, WBC's response was that 'a baseline assessment of the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability of the LPR evidence documents.' This TVERC report was undertaken in 2018 and has not been updated since. The report stated that: 'Up to date ecological surveys are needed to establish current site conditions and the presence of any protected species, sites or habitats are present on the proposed development site, avoidance and mitigation measures</p>

And WBC's response stated that: 'The updated version of the proposed allocation policy will require that any application strategy which will set out how priority habitats and ecological features will be protected and enhanced.' Yet despite the need for further ecological work and mitigation measures being required, there are no mitigation measures or evidence.

2. The WBC response to my objection about the biodiversity net gain stated 'that prior to the commencement of a development must be submitted to the relevant planning authority for approval.' The LPR states: 'Where there is a reasonable likelihood that species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the information necessary for determination to be made and licenses to be sought where necessary. Appropriate compensation measures should be put in place to avoid or would disadvantage the conservation of a priority species.' Bucklebury Parish Council undertook their own independent surveys and evidence of threatened birds and animals. There is no evident plan in the LPR to compensate for the biodiversity loss in the surrounding parks, on which there are no details apart from that it will link to Thatcham to the AONB. HELAA concluded that there are 'high risk of adverse nature conservation impacts' with 'areas of ancient woodland and grassland adjacent to the site.'

The LPR goes against the Defra's biodiversity 2020 strategy which states: 'The mission for this strategy, for the next decade, is to protect, restore, and improve nature, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better green and blue infrastructure for wildlife and people.'

3. The response to my objections about significant increase in traffic through Upper Bucklebury and the surrounding area is that 'a development of this nature would not be expected to go ahead without mitigation measures and improvements to the surrounding networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the increased traffic as a result of the development.' The Phase 2 Transport Assessment Report 2021 does not clearly evidence this. It states in its executive summary that 'further details and analysis of the impact and suitability of such measures, including the impact on trip rates, will be considered in the next phase of the assessment.' We are therefore being asked to consult on yet another assessment with no evidence. The Transport Assessment Report does confirm that no improvements would have the effect of diverting traffic off the A4 onto unsuitable local routes, such as that from Upper Bucklebury through to Cold Ash but there is very little evidence to support this. As a resident of Upper Bucklebury, I am very concerned about the inevitable increase in traffic through the village and the impact on the village with this.

4. In response to my objection that the new development would lead to a huge increase in light pollution and that we would have to live in a village to escape from the significant pollutants that living in a town creates, WBC's response included a commitment to a lighting strategy in the next version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy. However, find this lighting strategy in the LPR evidence base.

The LPR and its inadequacy of a 'robust evidence base' is highlighted perfectly by Appendix 5 of the Sustainability Appraisal. It states that the effects of the SA objectives. The conclusions of this document seem to be based on absolutely nothing. As an example, the SA for SP17 provides a positive impact on environmental sustainability and is unlikely to impact on air quality, noise levels, and climate change. There is no justification for this. The SA report itself states that the 'overall development of this site is likely to give a net positive impact on sustainability' and that 'while there is an unknown impact on environmental sustainability in relation to impacts on air quality, the proposed mitigation measures would be able to deliver an overall neutral impact.' No information is provided on the mitigation measures. The SP17 policy states that 'the development of the site will be supported by a Sustainability Charter which will establish a framework for how the development can be achieved' and then lists several strategies including energy, integrated water supply, ecology, lighting, biodiversity, and climate change. How can the SA conclude therefore that there will be a positive impact? What is this conclusion based on given that there is no evidence in the documents?

In the overall summary of SP17 in the SA, it states (rating a high likelihood) that 'The policy is likely to have an overall positive impact on sustainability yet in the same section states: 'The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability that need to be mitigated.' Again, as with so much in this plan, no mitigation measures are in evidence.

Finally, it is my understanding that when WBC initially developed the LPR, there was a requirement to build a specific evidence base. In December 2022, Michael Gove stated that housing numbers would no longer be mandatory so I would recommend that the development plan which is so lacking in evidence to make it sound and justified. This will allow time to understand the impact of development on greenfield land, which itself contains protected species (according to the recent Bucklebury Parish Council study). The loss of the ecosystems of the AONB is not a sensible option and will actually have a negative impact on the surrounding infrastructure and environment.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

<p>publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Varney, Andrea
Consultee Full Name	Ms Andrea Varney
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS881
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	02/03/2023 17:04:00
Attached Files	PS881 photo.png
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based</p>	

on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

- * Yes
- * No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

I would like to formally register my OBJECTION to WBC LPR Regulation 19, the proposed development of 150 Thattham, as I find it completely unsound for the following reasons:

1. It will dramatically reduce the greenbelt between Thattham and Upper Bucklebury.
2. The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thattham.
3. It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and if large scale are approved there will not be any open rural areas left for future generations to enjoy.
4. The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain.
5. The view that Thattham is best placed to take a development of this size in this location is misplaced, un-proven and unrealistic.
6. According to the Transport Assessment paragraph 3.26, 'The access arrangements for the Northern end of the Newbury junctions on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause problems'. I am unsure as to why this has been stated. Please can you share these with me? How can increased traffic on an already dangerous and busy road (without the development), be seen as not causing a problem?
7. I am also aware that there are drawings showing a new car park on Harts Hill. This again will increase traffic to an already busy road which is highly likely to promote anti-social behaviour, illegal activities, fly tipping and littering which we see regularly on Bucklebury Hill.
8. In terms of 'reducing accidents and improving safety' your assessment has concluded that 'the policy is likely to have a significant positive impact on walking, cycling and public transport'. Also regarding 'increasing opportunities for walking, cycling and public transport' your assessment concluded 'the policy is likely to have a significant positive impact on walking, cycling and public transport'. I wholeheartedly disagree with both of these assessments and I have concerns with the way the roads are designed with these in mind. Please can you provide me with the evidence and conclusions for both these assessments? Also, it's not just about the roads but the surrounding areas, villages and community which exist today and have done for years. What assessment has been done for these with the increased traffic?
9. Further to the above, this development will have a significant impact on traffic levels and the associated pollution to be increasing:
 - a. Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially as this road to the Primary School.
 - b. Traffic from Thattham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes.
 - c. Increased traffic through ALL the surrounding villages in general, especially as there is a plan for an exit at the Newbury which will significantly increase traffic towards Upper Bucklebury, Chapel Row, Bradfield, Cold Ash and Hermitage. WBC has stated 'the policy is likely to have a significant positive impact on walking, cycling and public transport' and 'the policy is likely to have a significant positive impact on walking, cycling and public transport'. This is a total understatement and completely neglected especially as the roads are already inadequate, have no pavements and are extremely dangerous with speeding traffic. Accidents is already high and this proposed housing development and exit will mean this is inevitable.
 - d. Traffic on the route into Thattham and Newbury. These roads approaching the station are already heavily congested and any minor traffic disruption will cause significant delays.
10. This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and other services which are overstretched.
11. Regarding healthcare, there is a significant lack of detail around strategic healthcare planning and the NE Thattham Development Consortium are aware, neither WBC or the developers have arranged or published a prospective Health Impact Assessment for this development. There is no engagement between the North-East Thattham Development Consortium and local general practises. Why hasn't a new GP site being available will result in the three existing practises in the area being overstretched even further? The fact that not provided evidence for the provision of a viable primary care medical facility. To add to this Thattham Dental Practice providing dental care for the local population, this will also get worse with the proposed development.
12. Regarding the environment, there will be damage to the Bucklebury Plateau Biodiversity Opportunity Area and the surrounding countryside which is the common. This development will also destroy the enjoyment of the local countryside by local communities in terms of the Downs AONB and will cause negative impact to legally protected wildlife. There is no evidence to support claims that the development will have a positive impact on the environment but instead it will have a significant and serious negative impact on the overall natural vegetation and sustainability. Environmental sustainability is defined as: 'the ability to maintain an ecological balance and conserve natural resources to support the wellbeing of current and future generations'. I am honest to say that WBC is not protecting the sustainability of our precious environment. In addition, as far as I am aware there is no assessment to analyse and address the negative environmental consequences. Why not?
13. Regarding education, within the Local Plan Review the provision for Nursery, Early Years, Infant and Secondary school education has been clearly defined. The provision for Primary and Secondary school education is unclear and contradictory. WBC has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years has not been defined in the LPR. The plan for the schools needs to take priority and should be confirmed before any housing development is approved. It is likely that houses will be built and no additional school provision will be provided, leading to oversubscribed schools and long waiting lists for places.

for our children. The LPR talks of provision of school fields however no evidence for funding or a suitable location (a space and air polluted A4 does not suffice as suitable) has been identified by the WBC or NE Thatcham Development Committee.

14. The development will significantly increase the noise and light pollution to the Bucklebury residents. There are no other options.

15. There is no evidence that this development will enhance Thatcham town centre (or the area in general).

16. It is not likely to attract new businesses to the area or create or significantly increase employment.

17. The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development will take its place.

18. There is now particular focus within the Consultation National Planning Policy Framework on taking into account the impact of housing on the environment, assessing how much housing can be accommodated. As a result of this, several local authorities have paused their plans to await the outcome of the consultation on the basis that a *lower housing requirement could be applicable to the plans planned for*. Although I am completely against the NE Thatcham housing development, I would ask that WBC should consider (and if possible have), to hold on the plan and present a revised plan in line with the updated planning guidance when this comes in.

To conclude, this development is unnecessary, inappropriate, and ill-conceived and should be rejected.

Please do not take the opportunity to live and play in our beautiful countryside away from our families today and future generations. Let the Thatcham housing development go ahead.

Photo 1: Please protect our countryside and views like this.

[See attached photo]

Observations

1. Why is WBC not writing to all residents to make them aware of this development and encourage/seek comments from a wider audience as possible?
2. Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and Bucklebury. Consideration of this approval now certainly seems to totally contradict this stated commitment.
3. Finally, why is WBC are now considering this development when a previous application was rejected by the secretaries?

I am prepared to appear at the public enquiry, if invited.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

Yes

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review
 * Yes
 * No

Event Name Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Walton, Deborah
Consultee Full Name	Ms Deborah Walton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1040
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>In response to the West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation, I want to strongest terms. I find the plan itself unsound and unsustainable on many grounds.</p> <ol style="list-style-type: none"> 1 The proposed location of such a large greenfield development is completely inappropriate to the needs of either residents. <ul style="list-style-type: none"> - The proposed development will forever remove this vital biodiverse environment from the enjoyment of both the residents. - There appears to be no mechanisms to protect the existing (particularly legally protected) wildlife and ancient adjacent areas (eg. Bucklebury Common) which also depend on that site as part of the local biodiversity. - The claim in SP17 that this proposal would have a positive impact on the environment is incredulous and brings disrepute to those preparing the whole document. - Creating "County Parks", which appear to already have been downgraded to "community parks", is no credible way to protect a biodiverse environment and certainly no justification for eradicating an existing ancient and biodiverse environment. Community parks would not have the same long-term protection and could themselves be consumed by housing in future. The current proposals would be insufficient to prevent increased load on the existing green spaces, causing further load on an already overburdened surrounding area, undermining the current efforts to support and restore the existing ecosystems around Bucklebury Common. - When walking through and around Bucklebury Common, it is not uncommon to find people riding motorised vehicles on roads and restricted byways (and other areas). These spoil the enjoyment of the area, but worst have a detrimental effect on the environment. These can also be heard at night, cause disturbance to those living around Bucklebury Common. Increasing traffic will cause this problem to grow. WBC appears unable to enforce the current regulations with the current population. The plan to increase the local population significantly without first demonstrating the ability to protect the existing environment is a proposal to ensure that this can be scaled. - The effect of climate-changing pressures can be seen when walking around the local woodland in terms of an increase in tree deaths due to water stresses. Increasing the local population will inevitably add further pressure on this already stressed ecosystem. This has not been considered within the proposal. 2 The roads in the surrounding area and particularly in and between the local villages are entirely inadequate for the proposed development. It is not credible to consider adding further traffic: <ul style="list-style-type: none"> - Any increase in the volume of traffic would require a significant upgrade of the local roads and the proposed development would require a large volume of increased traffic. Such an upgrade is (rightly) not proposed, but if it were, it would be completely at odds with the existing environment as a stated goal. This appears to be a self-contradictory aspect to this plan. - Some of the local roads have been designated as "quiet roads". These are currently overused by traffic. Adding more traffic will further. The plan contains no means to mitigate this problem. - Many of the roads through the local villages (many on the obvious "rat run" routes) do not contain pavements to help to avoid traffic. This will lead to serious accidents and "near misses" (particularly at dawn/dusk/night and during the winter months). One of our neighbours children was forced into a ditch due to passing traffic and the traffic is already much worse than it has been. - There has already been a steady increase in the traffic through the villages over the last few years. It is no longer possible to have windows open (in hot summers) on our road in Upper Bucklebury as drivers start using the road outside of our road at 5:30am. This will only get significantly worse with such a large increase in population. As there are no alternative routes (or, if affected), this traffic will further increase and affect the quality of life of the residents on ours and similar roads. - The increase in traffic will prevent recreational road users (cycling and walking) from an enjoyable and safe experience. This will prevent people from using the more green mode of transport (cycling) to reverting to their cars for safety purposes. This is contrary to the plan and local policies to move people away from using cars where possible. 3. The provisions for healthcare have not been adequately addressed: <ul style="list-style-type: none"> - It can currently take us up to 3 weeks to get a routine appointment with our doctor. Several years ago this was within a week. The plan does not address adequately the impact of a large number of people further increasing the load on the local healthcare system. The plan to build new health centres and/or extending existing ones does not address the underlying problem that these cannot be funded. The plan has not been understood and acknowledged in the plan, thereby casting doubt on the competence in this area of the plan.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Willett, Chris
Consultee Full Name	Mr Chris Willett
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1113
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Further to my previous Letter of Objection , dated 4th Feb 2021 (Re Policy SP17) which covered all of the normal top on the AONB, increased traffic, pressure on Health Care and Education facilities, Lack of Parking in Thatcham centre Letter of Objection (Re WBC LPR Regulation 19) which focusses more specifically on the potential use of existing, for future housing development and on the reduction in</p> <p>Housing Targets set by Central Government.(I still maintain all of my previous objections and therefore feel no need</p> <p>The CPRE February 2023 Newsletter points out that the local authority Brownfield Registers have identified over 35 which could theoretically enable the construction of up to 21,000 new homes, and in West Berks alone there are 53 allow the construction of up to 2837 new homes of varying types. These would also have the added benefit of being the area, rather than concentrated in the North Thatcham area</p> <p>It is also clear that the Minister for Housing (Michael Goves) has committed to a reduction of housing target numbers only (NOT 'Mandatory')</p> <p>The proposed development in North Thatcham is therefore clearly an unnecessary and unsustainable OVERDEVELOPMENT of Greenfield land adjacent to the AONB.</p> <p>We as long term residents object to the proposals in the strongest terms and would be happy to appear at the public</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We as long term residents object to the proposals in the strongest terms and would be happy to appear at the public</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tott, Rachel
Consultee Full Name	Rachel Tott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS771
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 21:52:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposal to build 1500-2500 houses in NE Thatcham because I find the plan unsound.</p> <p>I object to the plan because the plan for secondary school provision is unsound. I have young children and I am concerned that a secondary school there will not be space/ provision for them in local schools because the first set of houses could be built but not built. It's also not clear how many pupils the new school is to cater for, where it will be located, the number of year 6th form (which I believe it will need). I can't see the evidence that West Berkshire Council education authority has made for secondary school provision for the children that are likely to live in this estate or the families that remain in other parts of Thatcham built.</p> <p>I am also concerned with how the health care services will cope with the increased demand. I haven't seen evidence of a health care assessment, and I'm concerned that Thatcham's two primary healthcare centres are already overloaded, it's significant that the number of appointments now than it was in 2019, how are they going to cope? Again, with a young family this is of great concern as access to adequate health care services when they're needed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Berkshire Oxfordshire Bucks Integrated Care Board
<p>Consultee Full Name</p>	BOB Integrated Care Board
<p>Consultee Organisation</p>	BOB Integrated Care Board
<p>Agent Full Name</p>	Helen

	Clark
Agent Organisation	
Comment ID	PS548
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 17:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<ul style="list-style-type: none"> • BOB ICB notes that the proposed new Local Plan in effect provides for an additional 1809 housing units (once 2006 – 2026 Local Plan, the 721 units not being retained in the Local Plan Review, the 1958 non-allocated sites allowance and the 57 C2 units are taken into consideration). • We also note that of those 1809 housing units, 1500 are presumed to be at a North East Thatcham site and the draft states that “450 sq m of GP surgery is to be offered to BOB ICB or such appropriate body”. • BOB ICB has limited powers to own real estate and would consider that the draft plan does not make it all clear operational and functional primary care facility at nil cost to BOB ICB or whether this is an offer subject to the payment of how big the site would be nor whether any surfaced car park would be provided for the facility, and • If the latter, the ICB would consider that to be unacceptable. If the former, this is encouraging, albeit still not what they can consider sustainable as such a small branch surgery would be too small to operate effectively. • The ICB recognises that its requirement for new health infrastructure must comply with the requirements of Reg 2010. A planning obligation may only constitute a reason for granting planning permission for the development. <p>(a)necessary to make the development acceptable in planning terms; (b)directly related to the development; and (c)fairly and reasonably related in scale and kind to the development.</p> <ul style="list-style-type: none"> • Recognising that the ICB cannot require any mitigation that is not related in scale to this NE Thatcham development, Thatcham local practices, that a better mitigation of the extra demand from this NE Thatcham housing development finance being available to fund the balance of the development, is a GP premises development that is significant in order that it is a sustainable primary care facility. • This facility is proposed to be a minimum of 1,000 sq m in Gross Internal Floor Area(on 2 floors) but that the developer contribute to this health infrastructure as follows: • The donation of a freehold serviced site with good vehicular and bus access at nil cost sufficient in size to accommodate a minimum size of 1,000 sq m (and sufficiently large enough i.e. a rectangular site with a minimum area of 0.8 Ac for car parking and landscaping facilities for such a development) and • A capital contribution <p>Such that the combined financial contribution is equivalent to that currently envisaged in the Local Plan Review.</p> <ul style="list-style-type: none"> • The ICB has evidence for other new health centre developments, leading it to believe that the 450 sq m facility, as set out in the Plan review would currently cost approximately £3 M to build (including fees, VAT, finance, GP IT infrastructure etc.) • BOB ICB considers that this alternative mitigation would provide the necessary GP resilience needed as a result of this proposed NE Thatcham development, as well as allowing one of the local GP Practices to re-locate to the existing premises. • The ICB would therefore wishes to see the West Berks Local Plan review reflect the ICB’s requirements as stated above, that a well-accessed rectangular site of minimum area 0.8 Ac be donated by the developer to the ICB or its nominee, and valued by an appropriate Chartered Valuer) be part of the £3M developer contribution.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes</p>	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darroch, Duncan
Consultee Full Name	Duncan Darroch
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS929
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
* Yes
* No

Please give reasons for your answer

I have the following comments on the WBS LPR document:

Healthcare

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, **of detail or insight** into strategic healthcare planning.

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand. Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is no demand in other areas of the country. There is therefore **no realistic prospect of a new GP practice being established** in the foreseeable future.

It currently takes at least 2 weeks to get a non-emergency appointment at the Thatcham medical practice, yet you are proposing a new surgery with no concrete proposal as to how a new GP surgery may or most likely wont be established.

Five of the 10 lowest performing surgeries for percentages for same-day appointments came from this district. They are: Burdwood Surgery, with 27.1 per cent; **Burdwood Surgery**, with 28.8 per cent; Lambourn Surgery, with 29.5 per cent; Chapel Row Surgery, with 30.9 per cent; **Health Centre**, with 31.9 per cent.

Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients having to travel out of area for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of resident population have access to a dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the Council have considered any local dental practices regarding the potential impact of increased workload resulting from additional housing.

Thatcham Town Regeneration

As you state in the plan, Thatcham town center and facilities badly need regeneration, only after that is complete, should you consider housing.

Transport

Traffic on the local roads is already overwhelming at peak times, with queues on Floral Way every morning, the A4 is already congested and traffic will divert down country lanes which are unfit for the volume.

Since Covid, significantly fewer trains to/from Thatcham have been running. Given the lack of co-ordination around the railway, this will drive many more people onto the road.

Schools Provision Overview

The provision for education from Nursery, Early Years, through Infant to Secondary education is **not clearly defined** in the LPR. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education for all children. Without such provision, the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to predict the impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the area, not considered in the traffic plans and models in the LPR.

Unless the infrastructure (Schools, GP's, Shops etc) are built and functional in the first phase of the development the plan is untenable. The School for instance has a capacity of 1881 and an actual number of pupils of 1860, so they wont be in a position to take any more.

Flooding

Whilst there have clearly been extra measures built into the latest plans with the Wetlands Park, they have built over the wetlands which normally soak up the rain. I doubt very much the small wetland areas proposed would provide any safety net for those who live in the area. We can look forward to a repeat of the 2007 floods.

It is disappointing to see something that has clearly cost the tax payer a significant amount of money be so poorly thought through. At a keypoint about how the Thatcham area can support this sort of growth, the plan should be put on hold.

As usual the plan is there to meet unfounded targets regardless of the cost to the existing residents.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Fielding, James
<p>Consultee Full Name</p>	Mr James Fielding
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS809
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	02/03/2023 18:54:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to formally register my objection to WBC LPR Regulation 19, the proposed development of 1500 to 2500 as I find it completely unsound for the following reasons:</p> <ol style="list-style-type: none"> 1 It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and if this scale are approved there will not be any open rural areas left for future generations to enjoy. 1 The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a fl 1 It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury. 1 The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham. 1 The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-prov 1 According to the Transport Assessment paragraph 3.26, <i>'The access arrangements for the Northern end of the junctions on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause</i> modelling results for this, so I am unsure as to why this has been stated. Please can you share these with me? traffic and pollution on an already dangerous and busy road (without the development), be seen as not causing 1 I am also aware that there are drawings showing a new car park on Harts Hill. This again will increase traffic to and is highly likely to promote anti-social behaviour, illegal activities, fly tipping and littering which we see regu 1 In terms of <i>'reducing accidents and improving safety'</i> your assessment has concluded that <i>'the policy is likely to safety as safe travel will be critical to the design of the site'</i>. Also regarding <i>'increasing opportunities for walking,</i> your assessment concluded <i>'the policy is likely to have a significant positive impact on walking, cycling and pu</i>

should be designed with these in mind'. I wholeheartedly disagree with both of these assessments, and I have such as 'likely'. Please can you provide me with the evidence and conclusions for both these assessments? Also more importantly about the surrounding areas, villages and community which exist today and have done for years done to assure road safety for these with the increased traffic?

- 1 Further to the above, this development will have a significant impact on traffic levels and the associated pollution increasing:
 - 1 Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially walk along this road to the Primary School.
 - 1 Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large trucks.
 - 2 Increased traffic through ALL the surrounding villages in general, especially as there is a plan for an exit at the end of the road. This will significantly increase traffic towards Upper Bucklebury, Chapel Row, Bradfield, Cold Ash and Hermitage. *displacement of A4 traffic onto wider rural routes such as Upper Bucklebury*. This is a total understatement and a threat to road safety, especially as the roads are already inadequate, have no pavements and are extremely dangerous. The potential for serious/fatal accidents is already high and this proposed housing development and exit will mean a significant increase in the number of accidents.
 - 3 Traffic on the route into Thatcham and Newbury. These roads approaching the station are already heavily congested. Any event of any minor traffic disruption.
- 1 This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and will be overstretched.
- 1 Regarding healthcare, there is a significant lack of detail around strategic healthcare planning and the NE Thatcham Consortium are aware, neither WBC or the developers have arranged or published a prospective Health Impact Assessment for the development. Also been no engagement between the North-East Thatcham Development Consortium and local general practices. The likelihood of a new GP site being available will result in the three existing practices in the area being overwhelmed. As the developers have not provided evidence for the provision of a viable primary care medical facility. To add to this the developers are already unable to provide dental care for the local population, this will also get worse with the proposed development.
- 1 Regarding the environment, there will be damage to the Bucklebury Plateau Biodiversity Opportunity Area and the common. This development will also destroy the enjoyment of the local countryside by local communities in the area. The Downs AONB and will cause negative impact to legally protected wildlife. There is no evidence to support claims that the development will have a positive impact on the environment but instead it will have a significant and serious negative impact on protected wildlife, natural vegetation and sustainability. Environmental sustainability is defined as: *'the ability to meet the needs of in our planet's natural environment and conserve natural resources to support the wellbeing of current and future generations'*. I am shocked and disappointed that WBC is not protecting the sustainability of our precious environment. In addition to this a significant attempt to investigate, analyse and address the negative environmental consequences. Why not?
- 1 Regarding education, within the Local Plan Review the provision for Nursery, Early Years, Infant and Secondary schools has been clearly defined. The provision for Primary and Secondary school education is unclear and contradictory. WBC has a duty to make provide suitable schooling options. How this obligation will be met across all school years has not been stated in the LPR. The plan for the schools needs to take priority and should be confirmed before any housing development is approved. If not done it is likely that houses will be built and no additional school provision will be provided, leading to oversubscribed schools and ineffective education for our children. The LPR talks of provision of school fields however no evidence for funding for school fields (the field near the busy, congested and air polluted A4 does not suffice as suitable) has been identified by the WBC Development Consortium.
- 1 The development will significantly increase the noise and light pollution to the Bucklebury residents. There are no measures in place to mitigate this.
- 1 There is no evidence that this development will enhance Thatcham town centre (or the area in general).
- 1 It is not likely to attract new businesses to the area or create or significantly increase employment.
- 1 The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development will take away the parking space for the shop and pub.
- 1 There is now particular focus within the Consultation National Planning Policy Framework on considering the change in the way how much housing can be accommodated. As a result of this, several local authorities have paused their plans for housing development on the outcome of the consultation on the basis that a *lower housing requirement could be applicable to the plans currently planned for*. Although I am completely against the NE Thatcham housing development, I would ask that WBC (and other local authorities have), to hold on the plan and present a revised plan in line with the updated planning guidance when it is published.

To conclude, this development is unnecessary, inappropriate, and ill-conceived and should be rejected.

Please do not take the opportunity to live and play in our beautiful countryside away from our families today and future generations. Let the Thatcham housing development go ahead.

Observations

- 1 Why is WBC not writing to all residents to make them aware of this development and encourage/seek comment from the local audience as possible?

	<p>1 Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and the M3. The consideration of this approval now certainly seems to totally contradict this stated commitment.</p> <p>1 Finally, why is WBC are now considering this development when a previous application was rejected by the se</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	If invited
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Dickens, Barry
<p>Consultee Full Name</p>	Mr Barry Dickens
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS764
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	01/03/2023 18:37:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>General</p> <p>This Local Plan(LP) bears all the hallmarks of being a rushed and ill-considered piece of work. With the unexpected had to search around for an alternative large scale development and alighted on SP17-1500 houses in NE Thatcham varied shortcomings in this option it has been pursued on the basis of flawed logic, lack of supporting evidence and u</p> <p>There was an opportunity when WBC was unexpectedly required to produce a 30 year vision as part of the LP process and could have provided the opportunity for a reset. This opportunity was not grasped probably due to senior staff tu department of the Council.</p> <p>Housing Numbers</p> <p>The LP says 9146 new houses are needed in the plan period. This is based a 9yr old ONS Housing Projection and a Central Government will be publishing new advisory housing targets based on the 2021 Census which will provide a Furthermore WBC has over-achieved in its housing delivery in the current plan period but no allowance has been made. Many other councils have chosen to put a hold on their LPs until Central Government planning policy on housing nu likelihood is that fewer houses will be needed up to 2039 but WBC have decided to plough on regardless and impose Thatcham(SP17) many of which could well not be needed.</p> <p>On the basis of the foregoing rationale the LP is unsound.</p> <p>Strategic Gap</p> <p>The LP has reviewed and endorsed strategic gaps between settlements in a number of parts of West Berks save the Thatcham. The site selection background paper in Regulation 18 (not included at Regulation 19) said that only the h</p>

than the whole of West Berks would be considered. WBC expressed concern a development of 36 houses south of strategic gap between Newbury and Thatcham. However, the proposal to develop 1500 homes in North East Thatcham between the communities is accepted by WBC as having very few negative impacts. WBC's logic behind protecting gap has not been carried across to the North East Thatcham development.

In like vein, WBC in 2015/16 opposed the Siege Cross development saying it would erode the landscape between U amongst several other opposing comments. However, when the Siege Cross 500 home proposal has been incorporated into the North East Thatcham development impacting the setting of the AONB, WBC provide no evidence to contradict their evidence and are silent about harm to the AONB and the impact of the development on the landscape character and historic environment.

Health

The Local Plan is unlawful in that there is no evidence a Health Impact Assessment was carried out nor any consultation with developers or WBC with the Integrated Care Board. This is a mandatory requirement.

Education

Whilst details on early years and primary provision in support of SP17 are thin, those on secondary education lack substance. WBC determined that a 2500 home development was insufficient to fill a 6-8 FE. With the reduction to 1500 houses, no account has been taken of Government guidance that secondary schools with less than 6 FE are not sustainable or do not exist. The LP will now only provide the land for the secondary school. Where will the funding for a secondary school now come from? Education provision in support of SP17 in the LP is unsound.

Environment

The impact of SP17 on the environment will be devastating. It will have an adverse effect on legally protected wildlife and greenfield site when possible brownfield sites have been ignored. SP17 will also do damage to Bucklebury Common and the experience of visitors upsetting the balance between human presence and environmental needs.

The LP does not contain a preliminary ecological assessment although this is a statutory requirement.

Sustainability Appraisal

The LP says a Sustainability Charter is needed to demonstrate how the legally required biodiversity net gains will be achieved. There is no Regulation 19 of any supporting documentation to inform this Charter. The SA in the LP makes completely unsubstantiated claims about the sustainability of SP17. The positive or neutral claims about the impact of SP17 are not supported by any evidence and are misleading.

The SA does not meet relevant legal requirements in that it does not give full consideration to environmental effects and cumulative impacts. Furthermore the SA, as it is required to do, makes no attempt to consider and compare reasonable alternative sites for houses spread along Floral Way and the A4.

Transport

The NPPF says transport issues should be considered at the earliest stage of development proposals. It is therefore surprising that no consideration has been given to transport in the Regulation 19 document. The LP admits there will be displacement of traffic through the village resulting from SP17. Para 3.42 of the Phase 2 report says there will be a significant increase in traffic on the local road network in Upper Bucklebury, resulting from SP17.

Recent analysis of am and pm peak traffic has shown that the quickest route to Reading is via Harts Hill Rd and Colindale. The proposed development at NE Thatcham is built. That can only exacerbate the situation. The idea proposed in the LP of other modes of transport does not stand up because of the steep topography of the site and the distance of the SP17 from the station.

The bottom line is that SP17 would generate significant additional car journeys many of which would find a way through the village. The LP takes no account of the resultant highway safety issues.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Parsons, Dave
Consultee Full Name	Mr Dave Parsons
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS921
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to register my objection to the West Berkshire Council's Local Plan Review – specifically the SP17 North the following reasons:</p> <ol style="list-style-type: none"> 1. WBC has failed to properly engagement with its residents across the County. A lack of provision for a physical ex the internet has meant that a sector of the community without access to the internet have not been properly engage contrary to policies on inclusivity. 2. WBC has stated that the reason for the SP17 strategic allocation is, in part, due to the limitation on building in the Reference their Local Plan email on 24.2: <i>“To meet West Berkshire's housing needs, a larger strategic development of 1,500 homes in north-east Thatcham is necessary housing and supporting infrastructure. Given West Berkshire's restrictions in available development lan such as the 'Area of Outstanding Natural Beauty'), this location has been identified as the best location for this ty intention of the policy is to provide 1,500 homes on this site.”</i> Given that the Secretary of State, on 6th December 2022, changed the housing allocation numbers from mandatory transition period for LPRs that are inflight it beggars belief that WBC are still pushing ahead with a plan that includes an to make due to AONB restrictions. WBC is therefore acting recklessly and against its principles of unbiased decision 3. Appendix 4 – Assessment of site HELAA. In the Stage 2b suitability tab of this spreadsheet for THA20 (SP17) it is s Grade 3 agricultural land (some grade 2) yet it has not been validated if this is grade 3a or 3b land. Given that Agricu “best and move versatile” and therefore should not be developed, how is it possible that the correct grade of this land Additionally, the report by David Lock Associates – Landscape Sensitivity & Capacity Study for Land NE of Thatcham <i>Soils are classified as ‘Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils’ for the ma and ‘Loamy and clayey floodplain soils with naturally high groundwater’ for the southern section of the parcel of land NSRI/Cranfield Soil and Agrifood Institute website).</i> These soils contribute to a predominantly arable landscape The evidence states that SP17 is most likely on Best & Most Versatile (BMV) agricultural land and the David Lock rep valued. Government guidelines deter development on this type of valuable agricultural land. 4. Appendix 4 – Assessment of site HELAA. For THA20 the Stage 2b suitability tab of this spreadsheet classes the su Unknown”. How is it possible that the major allocation for the WBC LPR comprises sites where even by its own asses to be unsuitable. 5. The Sustainability Environmental Assessment states that SP17 will reduce accidents and improve safety. There is a plan however what we do know is that there will be an increase in traffic on country roads. Country roads tend to be na visibility and you're as likely to encounter a horse-rider, cyclist, walker or tractor as you are a car. Deliberately increa reckless act that is exactly the opposite of “reducing accidents and improving safety”. 6. The increase in traffic on the A4 – which is already unable to handle the amount of traffic at peak times – will incre direct conflict to WBC declaring a climate emergency. When WBC declared a climate emergency it stated that it wou reducing carbon emissions within its scope of control (ref: environment Strategy 2020-20300). WBC is responsible fo on the A4 idling due to congestion will only increase carbon emissions. 7. With the location of SP17, there is little or no provision for public transport within walking distance. It is naive to be this cluster will do anything other than dramatically increase the number of car journeys in the county further increas 8. SP17 includes provision for a healthcare facility. There is no detail on this, indeed WBC have failed to engage with that a development of this size fully caters for the needs of future residents. It's not just doctors, it's also dental practi This lack of detail is concerning as it shows that WBC has not done an appropriate level of due diligence and is not in needs of its residents are properly catered for. Without detailed information it is reasonable to be sceptical of any dev Practices that cover the SP17 area are already over-stretched. Of even more concern is that the Thatcham Strategic states that ‘A dialogue with the relevant healthcare and education agencies should be established early in the maste concerns that social infrastructure may not be provided.’ This is akin to closing the door after the horse has bolted an the horse would bolt. Without a properly thought-out and financed provision for all the healthcare needs that this dev leave its residents in a poor state with insufficient healthcare provision. 9. WBC has a duty to make arrangements for suitable school provision. The Thatcham NE Development plan propos secondary school which would be half funded by the developers. This development plan then goes onto state that th its own is insufficient to fill a 6-8 form entry school. Given that the allocation has reduced from 2500 to 1500 it is incor could now be sustained at this site as government guidelines are that secondary schools with less than 6 form entry the data used in the development plan was from a study from 2011. It's fair to say that a lot has happened in the last example of the WBC not doing its due diligence.

10. The LPR provides no information on provision for Nursery or Early Years education. Indeed with the data being unjustified as to whether WBC actually know what schools provision there should be. How can decisions be made on old and out of date information.

11. Finally with regards to schools, there is no provision for sports fields – which clearly require flat land. There is no – with an ongoing initiative to ensure that our children have access to green space and spend time outside it is a concern important enough to be included in the LPR. This again points to lack to completeness in the documentation and details.

12. In my regulation 18 response I submitted concerns about the loss of identity for Upper Bucklebury echoing WBC's refusal of the Siege Cross Proposal. WBC did not answer these concerns in their reg18 response to me. They also did not consider there to be no loss of identity if SP17 was allowed to proceed yet for a much smaller development (which would be a loss of identity. This gives grave concern as to the reason and underpinning logic and data being applied with WBC seemingly able to change their minds at will. My regulation 18 submitted concerns were as follows:

1. Loss of identity of Upper Bucklebury.
As a resident of Upper Bucklebury this concerns me greatly. The proposed development would end up incredibly close to the village and reduce if not remove the rural aspect of this village. The Bucklebury Vision and Plan detail that a strong greenbelt should surround Bucklebury and Thatcham. These documents were approved by WBC. Additionally, the Siege Cross proposal was refused on these concerns. The reason WBC gave for refusal included: (taken from the WBC Decision notice to refuse outline planning application) 3 (c) The proposed development would result in harm to the character and identity of Thatcham and erode the open landscape of Upper Bucklebury.

3 (d) The development would have an adverse impact on the distinctive local landscape character and appearance of the village which contributes to the setting of the AONB the boundary of which runs some 575 metres to the north of the site.

It is extremely concerning that WBC now considers this loss of identity acceptable. I.e.: recommendation from Site Allocations 2016 on a scale of development that could take place on THA20, it is considered that there should be no further allocations in the area, particularly as development of both north east and north Thatcham would result in the loss of the separate identities of the villages which would harm the setting of the AONB settlement pattern

In haste to find a single convenient solution it seems that it is acceptable that villages should lose their separate identities. Why does this stop? Why not merge all villages and towns together and be done with it? Such a narrow-minded attitude is unacceptable.

13. The Sustainability Appraisal / Strategic Environmental Assessment report makes positive statements in its justification of the site or proof. In fact whilst it makes justifications because of purported new educational and community infrastructure, WBC has not been delivered.

Page 1085 of the *Consultation Statement for the Proposed Submission LPR Dec 2022 v2* document states:
...this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements envisaged within Thatcham.

How can the SA/SEA provide a positive assessment based on infrastructure that will never materialise?

14. As this site allocation is in the setting of the AONB it will have a great negative impact on it. The LPR states that the site is a network that will facilitate connection to the AONB. With a proposed development size of 1500 houses this will mean that the site will be encouraged onto the AONB – onto Bucklebury Common. Bucklebury Common is an important Local Wildlife Site in Southern England. It already suffers from overuse and has a fragile ecosystem. Further pressure on the Common will harm the ecosystem here. There is no evidence citing any mitigation for this despite the Bucklebury Common being in AONB and the requirements around its safeguarding.

In summary, there are a number of areas where it is shown that the WBC LPR is based off old, inaccurate or incomplete information. There are a number of areas where the LPR is contradicted – either in its supporting information or in contrast to previous WBC statements. I have been given the opportunity to pause this process and review the LPR (statement made by the Secretary of State on 12th Dec 2022) even knowing such issues as stated above exist. All this evidence shows that the SP17 allocation is unsound and must be removed.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Duffy, Tara
Consultee Full Name	Tara Duffy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1081
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Whilst I recognise the need for increased housing and the Government's requirements on local authorities to meet our development proposals on the following grounds.</p> <p>Challenge the Need</p> <p>The reduction in available land to develop has been reduced recently by the 30% increase in the areas of the DEPZ's and I would urge WBC to challenge Central Government on the housing allocation.</p> <p>Impact on the AONB</p> <p>The proposal will close the gap between Thattham and the AONB. This is contrary to the statements within WBC's own Downs AONB Landscape Character Assessment (2002)', Policy SP8.</p> <p>Should this unacceptable proposal go ahead, against better judgement, then it should be made a Pre-commencement to create the 'country park' buffer zone (ie set boundaries, tree planting, hedgerows etc.) be established and protected before commencing. No consideration should be given to a Section 73 application to vary the Conditions or overturning the development should be limited to being below 95M above OD which is again in accordance with the above-mentioned WBC shows development up to 125 metres above OD, which would have a serious impact on the visual amenity in close proximity. Inappropriate over-development should be allowed to go ahead, a large proportion of the CIL monies should be spent on a buffer zone, however a 'Country park' – this has a specific accepted definition which is not met in this Plan. The three proposed settlement boundary have no meaningful environmental value or commitment to exclude subsequent development.</p> <p>The pie chart which shows the amount of open space is misleading in that it indicates 50% open space but looking at the case and must be also relying on the private garden areas and probably school playing fields as well. This is misleading and is not going to be available for public use.</p> <p>Traffic</p> <p>The traffic study included within the document is woefully inadequate and clearly based on inaccurate data and is a gross overestimate. Up to 5000 more cars (2 car spaces per household as required by WBC planning policy). This will lead to excessive parking and ratruns through villages. There will be further congestion and waiting times at Thattham level crossing and even worse on the wrong side of the level crossing.</p> <p>The junction with the A340, Theale to Tidmarsh Road, near Englefield Estate is already highly congested and dangerous, worse by the increased number of cars.</p> <p>The proposed mini roundabout to serve the development on Harts Hill Road will become seriously congested at peak times. The Mill Public House is fitted with the proposed traffic lights. This will cause tailbacks further up Harts Hill on the south side, inevitably lead to rear-end shunts.</p> <p>Increased traffic through Upper Bucklebury and other villages</p> <p>Non-Sustainable Location (Traffic)</p> <p>The distance of the proposed development from Thattham Station and the central amenities in Thattham will necessitate a need for parking. Parking in central Thattham is already inadequate (as recognised by Thattham Town Council).</p> <p>Pressure on Existing Facilities</p> <p>Number of houses now "at least 1,500" – From an initial site assessment of 2,500 of which 1,250 were to be built in 2036, the fact increased to 1,500 houses because the Plan extends to 2039 rather than 2036 (as originally proposed).</p> <p>The development will place excessive pressure on existing doctor and dentist surgeries, primary and secondary schools and capacity as the new facilities proposed will not be constructed in advance of the housing.</p> <p>Ecology</p> <p>The Pang Valley is a unique, precious and special environment and one of only 200 chalk-fed rivers in the world. There is a huge loss of green field and open space which will lead to an increasing urbanisation of the area. This will impact on the AONB in terms of increased traffic and light pollution, pedestrian footfall, littering, illegal use of off road vehicles on the River Pang, all with the inevitable detrimental effect on local wildlife and their habitats and the special character of the area. Consequential damage to the Common – increased footfall; increasing damage to an ecosystem of national importance. Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive impact and overall benefit. Lack of strategic gap between Thattham and Bucklebury – Thattham and Upper Bucklebury will effectively merge and lose their identity.</p> <p>Surface Water Run-off and Flooding</p> <p>There is no question that the proposed development will have a massive impact on the flood risk to Thattham.</p> <p>Utilities Infra-Structure</p> <p>The existing water, gas and electrical supplies and foul and surface water drainage systems are already stretched to capacity and would create unacceptable pressure leading to system failures.</p>

	I would strongly urge WBC to reconsider this potential development in light of these important considerations and the opinion against these proposals.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wyatt, Margaret
Consultee Full Name	Margaret Wyatt
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS882
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 11:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>To build 1500-2500 houses in this beautiful part of West Berkshire will destroy the area – no blue sky at night with stars. There will be the noise of increased traffic on Broad Lane. Where is the exit?</p> <p>My excellent Chapel Row Surgery cannot cope with more patients.</p> <p>Can the Community Hospital be enlarged? The ONE small chemist is not open all the time. I have to go to Boots in Oxford.</p> <p>When the railway crossing at Thatcham is down the queue of waiting cars will enter the A4 – more traffic and noise.</p> <p>Where are your plans for new schools? The education of children has been disturbed through Covid. We all need schools of 30 years and <i>[personal details removed]</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Fittall, David
Consultee Full Name	Mr David Fittall
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1091
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to WBC to object to <i>WBC LPR Regulation 19</i> which proposes a development of 1500-2500 houses NE of Thatcham.</p> <ul style="list-style-type: none"> WBC itself objected to the much smaller Siege Cross development in 2015/16 raising concerns about visual impact and proximity to the AONB. Why then given Siege Cross is a subset of this now much larger proposal are there no objections? Lack of detailed and concrete plans for infrastructure for such a large development: <ul style="list-style-type: none"> Provision for medical facilities lack detail, and no Health Impact Analysis has been undertaken. Nothing in the plans for Nursery education provision, Primary provision is vague, and Secondary school location identified. Funding is unclear and out of date data is used to assess pupil numbers. The obvious environment impact of so many houses in one area are skated over, with vague and unsubstantiated claims in the hope of deflecting from the very real impact this will have on the wildlife, green spaces, buffer between villages, and the increased traffic and footfall and hence impact on the AONB/Bucklebury Common. The road traffic analysis is optimistic and the case of the Cold Ash and Upper Bucklebury non-existent. Again, these will have major impact on traffic across Thatcham, particularly the A4 and will greatly increase traffic on the village route into Reading via Upper Bucklebury, Cold Ash, Chapel Row and Bradfield. The village routes experience congestion today, and a 1500-2500 housing development will make this worse. This will severely impact the quality of life (in Thatcham) and create safety concerns via increasing traffic volumes on unsuitable village/country roads. The size of the development has been spun by WBC as a reduction from 2500 to 1500 whereas it is in fact an increase from 1250 in the Reg 18 Consultation to 1500 in this Reg 19 Consultation. Reg 19 is now silent on the number of houses in the plan period whilst it is very clear the area referred to is the same geographical size as that in Reg 18 which stands to be deliberately misleading messaging from WBC from Reg 18 to Reg 19. The overall impression is that the WBC is, no matter what, committed to this large scale development NE of Thatcham in its case to fit a pre-determined conclusion. This is reinforced by the seeming lack of proper assessments, consultations in each of the thorough responses from Thatcham Town Council, Cold Ash Parish Council and Bucklebury Parish Council. There has to be concerns that much of WBC's case is based upon the Thatcham Strategic Growth Study that was commissioned to stand to profit from the allocation of this specific site. The study did not consider alternative sites, has not been adopted nor has it been adopted by WBC. Also WBC is stubbornly proceeding with the Reg 19 Consultation even though national policy is changing after the election of Michael Gove, and with an ongoing consultation on amendments to the NPPF – other local authorities have passed up these changes are clear. WBC has not, which does not make sense. WBC has also overdelivered on required houses in the past few years. So this and the NPPF consultation at national level requirement for such a large development has to be questioned. There are also numerous additional concerns about this development: <p>I have read the responses to Reg 19 from Thatcham Town Council, Bucklebury Parish Council, and Cold Ash Parish Council and highlight the flaws in WBC's proposal, particularly that WBC has not made the proper and required assessments.</p> <p>As a resident of Upper Bucklebury the impact on local infrastructure (esp schooling and medical provision), to the countryside and Bucklebury Common are of great concern. In addition, the increased traffic through the village would be terrible and would change the life in the village and in the other villages on the route in Reading.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Walton, Andy
Consultee Full Name	Mr Andy Walton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1103
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>In response to the West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation, I want to strongest terms. I find the plan itself unsound and unsustainable on many grounds.</p> <p>1. The proposed location of such a large greenfield development is completely inappropriate to the needs of either the residents.</p> <ul style="list-style-type: none"> • The proposed development will forever remove this vital biodiverse environment from the enjoyment of both the residents. • There appears to be no mechanisms to protect the existing (particularly legally protected) wildlife and ancient woodlands (eg. Bucklebury Common) which also depend on that site as part of the local biodiversity. • The claim in SP17 that this proposal would have a positive impact on the environment is incredulous and brings those preparing the whole document. • Creating “County Parks”, which appear to already have been downgraded to “community parks”, is no credible way to protect a biodiverse environment and certainly no justification for eradicating an existing ancient and biodiverse environment. Community parks would not have the same long-term protection and could themselves be consumed by housing in future. This would be insufficient to prevent increased load on the existing green spaces, causing further load on an already overburdened surrounding area, undermining the current efforts to support and restore the existing ecosystems around Bucklebury Common. • When walking through and around Bucklebury Common, it is not uncommon to find people riding motorised vehicles and restricted byways (and other areas). These spoil the enjoyment of the area, but worst have a detrimental effect on the environment. These can also be heard at night, cause disturbance to those living around Bucklebury Common. Increasing traffic will cause this problem to grow. WBC appears unable to enforce the current regulations with the current population. It is not possible to increase the local population significantly without first demonstrating the ability to protect the existing environment. The proposals to ensure that this can be scaled. • The effect of climate-changing pressures can be seen when walking around the local woodland in terms of animals suffering due to water stresses. Increasing the local population and inevitable further pressure on this already struggling environment. This has not been considered within the proposal. <p>2. The roads in the surrounding area and particularly in and between the local villages are entirely inadequate for the amount of traffic to consider adding further traffic:</p> <ul style="list-style-type: none"> • Any increase in the volume of traffic would require a significant upgrade of the local roads and the proposed development would require a large volume of increased traffic. Such an upgrade is (rightly) not proposed, but if it were, it would be completely at odds with the existing environment as a stated goal. This appears to be a self-contradictory aspect to this plan. • Some of the local roads have been designated as “quiet roads”. These are currently overused by traffic. Adding more traffic will further. The plan contains no means to mitigate this problem. • Many of the roads through the local villages (many on the obvious “rat run” paths) do not contain pavements or adequate drainage. This will lead to serious accidents and “near misses” (particularly at dawn/dusk/night and during the winter). One of our neighbours children was forced into a ditch due to passing traffic and the traffic is already much worse. • There has already been a steady increase in the traffic through the villages over the last few years. It is no longer possible to have windows open (in hot summers) on our road in Upper Bucklebury as drivers start using the road outside of our 5:30am. This will only get significantly worse with such a large increase in population. As there are no alternative roads (or affected), this traffic will further increase and affect the quality of life of the residents on ours and similar roads.

	<ul style="list-style-type: none"> The increase in traffic will prevent recreational road users (cycling and walking) from an enjoyable and safe experience. People are being encouraged to use their cars for safety purposes. This is not in line with local policies to move people away from using cars where possible. <p>3. The provisions for healthcare have not been adequately addressed:</p> <ul style="list-style-type: none"> It can currently take us up to 3 weeks to get a routine appointment with our doctor. Several years ago this was not the case. The plan does not address adequately the impact of a large number of people further increasing the load on the local health services. The provision of one or more new health centres and/or extending existing ones does not address the underlying problem that the health problem has not been understood and acknowledged in the plan, thereby casting doubt on the competence in
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hillerton, Anne
Consultee Full Name	Anne Hillerton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1036
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	03/03/2023 13:58:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>As a Bucklebury Parish Councillor I fully support the objection submitted on behalf of the council and concur with the reasons outlined in BPC's submission. However I feel the need to add my personal objections to the plan which are on Upper Bucklebury and have an enormous impact on my wellbeing and that of others including my elderly neighbours since the 1960s.</p> <p>The negative impact of the proposed housing would change Upper Bucklebury from being a small rural village to being a village. I chose to live in Thatcham when I bought my house in January 1988. Thatcham has transport links, shops and cheap housing. Upper Bucklebury is a rural village with dark skies and access from my property to a wood where I regularly see deer, badgers, interesting plants and a short walk to Bucklebury Common with its wonderful biodiversity. I take enormous pleasure on a warm evening sitting on the porch watching the stars which are very visible because of Bucklebury's dark skies policy, listening to the call of a nightjar, watching bats and owls. My grandchildren feel it is a treat to sleep in my house because they hear 'the Wise Old Owl'.</p> <p>Having so many new houses a very short distance from the bottom of Blacklands Copse will cause light pollution so the stars and night sky will be lost. That number of people living so close to Blacklands and Bucklebury Common will have a serious negative effect on the endangered species which will vanish. Now in my 70s, I will find this very hard to deal with so my wellbeing is at risk. Yes, I know I have built up a network of local friends and neighbours in the thirty five years I have lived here. I have invested in the area in knowing the area well to walk for my physical and mental fitness.</p>

	<p>The extra traffic coming up Harts Hill, through the village and along the Common has not been thought through. Harts Hill is already too busy and dangerous when driving up and coming across a cyclist just round a bend and a lorry or a bus on a frequent accidents already and the proposed number of houses will make this a death-trap. The village of Upper Bucklebury and elderly residents crossing to the shop or church and children walking to Bucklebury Primary School are already suffering from that the development would produce.</p> <p>Upper Bucklebury children have historically gone to Kennet School until recently when The Downs in Compton increased. Some parents who can afford the expensive bus fare or who are lucky enough to have time to transport their children to be educated at The Downs. Were the new development to take place, in the early days before a new school would be opened, houses would take up the Kennet places as geographically they would live closer than Upper Bucklebury pupils. Were we to become the allocated school for Upper Bucklebury rather than the school of choice, WBC would have an empty school. This is something I know WBC would not want to do because I was one of the group who set up Bucklebury Community School. Bucklebury pupils to and from Kennet when the bus passes were removed.</p> <p>Building so close to Upper Bucklebury would produce so much more footfall in the village and on the footpaths and in the shop to the area around Colthrop Manor is the Spar shop in Upper Bucklebury. That would encourage much increased use of Long Grove Copse which would be seriously detrimental to the ecosystems in the area. The path is a muddy footpath with increased usage. The track on the housed part of Longrove is maintained by the residents and increased use would be and massively increased costs.</p> <p>These are some of the reasons I oppose the plan. I have no problem with a smaller number of houses being built in the area but the current strategic gap is very important to me. Without it the effect on the biodiversity and ecosystems, and the way of life, would have a catastrophic effect on my mental health and wellbeing and that of many other longstanding residents.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Weedon, Sam
<p>Consultee Full Name</p>	Sam Weedon
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS925

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I have been a resident of Upper Bucklebury my entire life - since 2001 - I strongly object to the proposed Local Plan. reasons set out below and that it will have an irreversible negative impact on the quality of life in the area. Transport

	<p>Access to/from the development will be via the A4 which is already gridlocked at peak times with traffic backing up along to Reading or the M4/A34 will inevitably seek an alternative route up Harts Hill through Upper Bucklebury. Harts Hill has caused numerous accidents over the years and is especially dangerous in winter, even when gritted. The development through Upper Bucklebury and pose an increased risk to villagers walking their children to school in the morning or on no pavement along Burden's Heath, which cars will use to head towards Cold Ash and Junction 13 of the M4.</p> <p>Healthcare</p> <p>The healthcare proposals contain only wishful thinking with no detail and an absence of consultation with existing medical practices. There have been no Health Impact Assessments. NHS England has commissioned few new GP practices, so the burden on existing practices is already overstretched. Bucklebury is fortunate to have a well-managed medical practice but it was stretched during the provision of repeat prescriptions and other services. An excess of new potential new patients will have a severe impact on the ability to service its current list.</p> <p>Environment</p> <p>The Plan will have a severe negative impact on the footpaths and woodland in the proximity of the development. Within the development and is traversed by means of a narrow footpath, with few visitors encountered on each walk. The development will increase footfall, widen the path and change the character of the area. Bucklebury Common similarly has many narrow paths, the flora and fauna. The development will result in a significant increase in pollution – light, noise and emissions – all of which will have a negative impact on the environment.</p> <p>Strategic gap</p> <p>Upper Bucklebury retains its separate identity from Thatcham solely because of the green strategic gap north of the village and distinct boundary between the two urban areas. If the North East Thatcham development proceeds Upper Bucklebury will merge with Thatcham and will itself become North East Thatcham. The rural nature of Upper Bucklebury will be destroyed.</p> <p>Education</p> <p>The Thatcham NE Development Plan, funded by the developers, was based on West Berkshire District Council data and is therefore out of date. The same plan also notes that the proposed development is not sufficient on its own to justify a new school. Government guidelines state that secondary schools with less than 6FE are not sustainable. The developer funding the construction, and has no impact on the substantial running costs of the school. Much of the site is sloping and there is no sports field, unless it is close to the A4.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Tompkins, Mark
Consultee Full Name	Mark Tompkins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS880
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 07:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposed Thatcham NE Development on the grounds that it is unsound and will have a p myself and the surrounding environment.</p> <p>Whilst I am fully aware of the the pressure on WBC in terms of the need to increase housing stock, the proposed dev of fundamental ways:</p> <p>1. Transport impact</p> <p>The development would create an intolerable increase in the level of traffic using roads that are already fully congested A4, particularly to the eastern side of Thatcham would inevitably become gridlocked further. This will impact profoundly but also create increased pressure on alternative routes. The road through Upper Bucklebury already has in place m increased traffic volumes. The Development would force even more traffic onto this road which is self evidently not de impact all residents in the village. The impact of the additional traffic on Harts Hill Road would be catastrophic particu development on that road. The inevitable bottlenecks created would mean access to and from Thatcham and Newbu would be seriously impacted.</p> <p>Furthermore, the development would place intolerable strain on the roads and parking nearby Thatcham Railway Sta users of that station from the development would drive and park.</p> <p>Building the proposed development would cripple an already overstrained local transport infrastructure.</p> <p>2. Environmental impact</p> <p>It is undeniable that the development will clearly destroy a large green field site which in itself will have a tremendously n area. Whilst it is acknowledged that the development will not directly be built in areas of specific protection etc. the very to these areas (eg.natural woodland) would inevitably mean that these areas would be extremely adversely affected numbers of people, particularly children, would gravitate to these protected areas and sadly, there are innumerable p destroy their beauty and underlying habitats. This should not, indeed cannot, be allowed to happen.</p> <p>Building a development of the scale proposed and at the site earmarked is criminal in ecological terms.</p> <p>3. Local infrastructure</p> <p>Key facilities in Thatcham and the surrounding areas are already at breaking point. In particular, existing schools, do will simply not be able to cope with the large population increase. Trying to squeeze the proverbial quart into a pint p affect the whole population. In terms of Thatcham itself, the village simply cannot handle the additional number and a community and in particular outlying areas such as Upper Bucklebury.</p> <p>Quite simply, a development of this scale is unsustainable in its current location. Alternative solutions should be soug</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Alternative solutions should be sought.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bertrand, Corinne
Consultee Full Name	Ms Corinne Bertrand
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS944
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 18:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Objection as follows</p> <ol style="list-style-type: none"> 1 I am objecting to the plan as so much of it is seriously unsound and it would have a massively detrimental effect as well as extra stress on Buckkebury common environment, flora and fauna. 2 The statement by Michael Gove (6th December 2022) indicates that the housing numbers are now advisory and should no longer override sensible local decision-making. 3 The plan shows no evidence of any surveys to provide baseline conditions or indeed to provide definitive proposals. The environment would be improved and what they would do to "mitigate" any destruction of environmental features. The plan is unsound. 4 Building a major Greenfield development in the north Wessex downs AONB will forever affect the enjoyment of the area for local communities. There will be a detrimental impact to legally protected wildlife known to be present on the site, not to mention the use of existing areas such as Bucklebury common. This again shows that the plan is unsound in its analysis, reasoning and conclusions. 5 Before any development of this size is undertaken, there should be sufficient capacity in the local foul water processing facilities. Any development of this size will produce a significant amount of foul water. I have seen no mention of analysis or funding for the expansion of the sewage processing facilities. As soon as any building starts, surely that is another reason why the plan is unsound. 6 The plan is unsound where traffic considerations are concerned. There is no plan or funding for a bridge over the river for example. 7 The development is so far away from Thatcham station and Thatcham town centre that many extra cars will be required to access an unsound part of the plan. 8 As a local resident for over 40 years, I feel that the building of 1500 houses so close to Upper Bucklebury will be detrimental and forever for me, my household and anyone living in this very special area. 9 The plan for secondary school provision is unsound with no timing or funding, no analysis of possible pupil numbers and no location of any school. 10 This is still essentially a plan for 2500 houses. The developers have simply reduced the headline numbers to make the development the same. It would then be a comparatively easy matter to build the other 1000 houses in the future. This is no concession at all. <p>I hope I have shown in the above examples that this unsound plan should be rejected.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Harris, Chris
Consultee Full Name	Mr Chris Harris
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1046
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:52:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the Thatcham NE Development.</p> <p>The proposal is fundamentally unsound in many areas, I would like to object on t</p> <p>Impact on legally protected wildlife</p> <p>We know these to exist in the area directly next to the development as well as in the surrounding area. We have local knowledge and experience and the studies that have been undertaken:</p> <ul style="list-style-type: none"> Great crested newt Badgers Nightjars Slow worms Variety of Bats <p>The proposed development would put them under significant threat. There are no suitable mitigation measures. There now does not even appear to be a country park. There is no direct benefit to the area which would be enhanced. This shows WBC lack of commitment to protect the natural environment.</p> <p>WBC states that sustainability charter is required to establish how policy requirements are met. The legally required biodiversity net gain and environmental sustainability are not covered in any of the documents either these do not exist or they have not been made publicly available.</p> <p>There has been no evidence of any serious attempt by WBC to investigate, analyse or mitigate the environmental consequences of the development, and any policies that are referenced are not relevant.</p> <p>Additional cars and people will be entering AONB which will have a detrimental impact on what WBC are doing to protect, conserve and enhance the natural beauty, in fact the road will be directed into the AONB instead of away from it.</p> <p>Increased Traffic</p> <p>As WBC predict that there will be some displacement of A4 traffic onto wider rural roads in the area of Bucklebury there is no evidence that this has been fully considered. We along Bucklebury Road down the road with no pavement and down Broad Lane with 2 primary school age children living on it is dangerous as cars do not adhere to the 30mph limit. Broad Lane is also very busy with no pavements (some very narrow due to over grown hedges) the cars pass as such it is frightening.</p> <p>The studies conducted by WBC so far do not agree with an independent study by an independent consultant who found that: the trip rates used by WBC are unreliable and not robust, the trip distances are too long, the mitigation measures are improbable at best, the location of the site means cars will be able to dominate, the highway network in the vicinity of Thatcham Northeast is already congested and there has been no assessment made of the routes most likely to be affected by an increase in traffic.</p> <p>We strongly fear for our safety and feel it's only a matter of time before there is a serious accident. Increased traffic with no mitigation is putting lives at risk and completely at odds with the council's commitment to Accidents and Improve safety.</p> <p>Education</p> <p>There is not a clearly defined planned schools provision. This breaches the council's commitment to education facilities thus making the development untenable. Our children currently attend a Primary School with a view to carrying on their education at Kennet. There is inconsistent and contradictory information on the provision of secondary schools in and around the area. It is unlikely that any secondary school provision will be provided.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Local Plan Review Consultation</p>

	<p>With the announcement by Michael Gove on the 6th of December 2022 that housing numbers should be an advisory may Local Authorities are choosing to pause their planning an await the outcome of the consultation and potentially WBC should do the same.</p> <p>HEELA has shown more more options for development, yet this has not been revisited since the start of the process</p> <p>In 2015 the plan for 500 houses was rejected at ministerial level. This proposal is triple (or more) of the proposal. It is surveys that are full of holes, and potential legally questionable. Some studies, such as the environment and biodiver carried our or have not been made available to the pubic. Thames water have not even been consulted.</p> <p>The whole proposal is a disgrace, if allowed to go ahead will cause huge negative impact on the area and local supp</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wilcock, Bridget
Consultee Full Name	Bridget Wilcock
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1063
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	Letter
Response Date	02/03/2023 10:27:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the Thatcham North East Development, it is very unsound on so many factors. I will deal with the following factors:</p> <p>Healthcare:</p> <p>All 3 practices locally are already overstretched. I believe that my surgery (Chapel Row) would struggle to take any more patients. The fact that the local surgeries are closing is also a problem. It takes about 2 weeks to get an appointment – what will happen if this huge development opens? The Plan proposes a 450sqm primary health care facility – there is no detail about this. On this point for a development of this size a Health Impact Assessment (HIA) should accompany it to demonstrate how the conclusion of the HIA have been considered in the development. It appears that neither West Berkshire Council or the developers as public/private stakeholders have arranged or published a HIA for the North East Thatcham Development.</p> <p>New housing will put an immense strain (young children/ maternity ect...) on an already stretched facilities.</p> <p>Dentists:</p> <p>My points above also reflect the position relating to dentists.</p> <p>Schools:</p> <p>The plan states that the site will provide Nursery & early year provision but this is not clearly defined. How can a site of this size be provided?</p> <p>The plan for a secondary school is unsound as there is no evidence of numbers, the location is not clear, or the number of places is unclear. A 2 form (4 form entry is required for sustainability) the current infrastructure can't support the current plan.</p> <p>Sports field provision – school fields require flat ground – the only area will be near to the A4 dual carriageway – a very noisy area with a lot of fumes. If the school is not viable, the playing fields will not materialise.</p> <p>Traffic:</p> <p>We are led to understand that traffic from the development would link to floral way and the A4. The Transport Assessment mentions an exit north of the site on to Harks Hill – traffic to and from the site only going towards Bucklebury.</p> <p>A few things to mention here – Harts Hill is a very narrow, bendy road, with blind corners, it is already a very dangerous road with a lot of serious accidents. There is no pavement facility or few room to provide this. It is extremely dangerous – especially in winter with water running down it. Traffic coming from the exit towards Upper Bucklebury is taking more traffic onto a single lane road. The 'rat runs' from the A4. It is already busy and an accident waiting to happen, more traffic I feel will have devastating consequences.</p>

	<p>There is also mention of a car park on harts Hill – there is no sight of this on Plan. This will add to the dangers and anti-social behaviour. The traffic is already very busy. I travel from Upper Bucklebury into Newbury for work. It is very worrying at the traffic calming chicane & this will be made so much worse with the new development – and more scope for walk to school – again I am very worried it is already an accident waiting to happen – more traffic will severely increase and will be increasing pollution.</p> <p>Water supply / sewage disposal:</p> <p>We already experience water issues, both with our homes and water on the roads. I just feel that the infrastructure is not up to the development. The amount of standing water outside Peaches stores by the crossing/ chicane has been frightening.</p> <p>Environment:</p> <p>It is very worrying that a number of serious threats to the environment have been identified. It will cause a detriment to the wildlife. It will forever damage the countryside, ancient woodland and heaths. The proposal for 2 'country parks' is very worrying.</p> <p>Conclusion:</p> <p>In conclusion I think that the plan is wholly unsound. WBC have broken their own processes for not inviting others to comment. The developer has written the plan.</p> <p>Communities have not been consulted and clear plans have not been produced. It all looks to be inadequate.</p> <p>The pressure that it will put on local doctors, schools, roads, the environment are unacceptable.</p> <p>Again I object to this development and feel that it is wholly unsound, and I hope that common sense will prevail.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hunt, Julia
<p>Consultee Full Name</p>	Julia Hunt
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS800
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 19:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to object to the Regulation 19 Consultation relating to the traffic implications for Chapel Row and most particularly The Avenue is a rural road with common land on each side. I note that it is expected that there will be a significant increase in traffic as a result of the development and I don't believe the impact on Chapel Row and The Avenue have been taken into account.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jackson, Andrew
Consultee Full Name	Andrew Jackson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS738
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:22:31
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	On the basis of lack of 'Practical' sustainability I dont believe the North East Thatcham development is legal.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The local area already struggles with maintaining adequate Health & dental care for the residents. With what's being capacity accommodate the additional residents and are there the doctors & nurses available to support these facilities medical staff!</p> <p>Plus there's specific educational needs, where all current schools are full to capacity, with class sizes already bulging. accommodate all the additional children and are the teachers available to be employed within these facilities?</p> <p>Then there is the road infrastructure, which chokes already with the volume of traffic and noise this creates, along w Floral Way is already a race-track, with this development will exacerbate this issue further.</p> <p>Removal of wooded areas will also reduce the ability to migrate the carbon dioxide to oxygen process, therefore air</p> <p>To summarise - this development is a non-starter for Thatcham - it will NOT benefit the town and any expansion will the area.</p> <p>I understand additional housing is required within the West Berks area. However and specifically, the Thatcham deve will place an excessive strain on local resources that makes the proposal unsustainable.</p> <p>It this proposal can be condensed to a reduced scale then this may be more palatable, allowing for organic growth w copious other sites that may accommodate such grand scale developments.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Alp, Helen
Consultee Full Name	Mrs Helen Alp
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS734
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object to the plan as I found the following areas unsound and not evidence-based</p> <p>3.1 Transport</p> <p>3.1.1 Increased Traffic</p> <p>WBC planners advised that traffic from the development would link to Floray Way, which they forgot to mention and on January when the Transport Assessment was published that there is a plan for an exit at the north of the site onto Harts Hill as the traffic will obviously go in the direction of Upper Bucklebury to bypass the A4 congested traffic. I live in the village of Upper Bucklebury and the increase in traffic (which doesn't have to be a lot of cars) will make Broad Lane a rat race and dangerous to school and all residents.</p> <p>The transport Assessment says in paragraph 3.26 'The access arrangements for the northern end of the NET site are proposed along both Floral Way and Harts Hill road. Results from the modeling suggest that these will not cause problems' The do not seem to be a problem for this so how can this be legal?</p> <p>3.3 Environment</p> <p>Siting a major greenfield development in a landscape setting of the North Wessex Downs AONB will have a major impact on the area and more importantly have a detrimental impact on local wildlife.</p> <p>WBC states in the LPR that Sustainability Charter is required to show how the policy requirements will be achieved. In their documents, they have not been publicly available for the Regulation 19 Consultation, this must be illegal! The Sustainability Charter and the SP17 policy is likely to have an overall positive impact on sustainability but this seems to be ignoring the environmental impact on the social and economic benefits.</p> <p>I am a resident of <personal details> Upper Bucklebury, and have enjoyed this tranquil area I am deeply upset that that Thatcham into Upper Bucklebury and we will lose our village identity.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Watson Stubbs, Freddie
Consultee Full Name	Freddie Watson Stubbs
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS792
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 20:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Please accept this email as a clear objection to the plans due to their unsound nature.</p> <p>I have lived in Upper Bucklebury for <redacted> years and find the blatant disregard for community and the natural environment results in my support of WBC to be no longer evident.</p> <p>I moved to the area with a newborn child (and have since welcomed <redacted> new members of the family in <redacted> Thatcham and specifically Upper Bucklebury for the natural environment, the protection of the AONB area, and the views afforded to me. The blatant disregard of our local biodiversity, even with the proposed inclusion of a community park causing the loss and natural habitats of so many local wildlife, and cause irreparable damage to our prized local environment.</p> <p>As a parent of a school aged child (and <redacted> due to attend local schools in the future) the lack of consideration for me, there is no wider remit to support the already over subscribed Kennet school (which is our only option for high school) a coherent end-to-end plan within the LPR at all. Within this plan WBC are breaching your own obligations to provide education from EYFS to secondary education.</p> <p>I am also concerned about the lack of consideration for traffic and infrastructure across the whole of NE Thatcham and surrounding communities that access services within the area. The increased traffic through our small villages as people seek quality of life in already congested A4, and this can only be a danger to our local village, and the general public, especially our young children walking to village to school, endangering them to the risks of high traffic volumes and pollution.</p> <p>I object wholeheartedly to this planned development and stand with my community as we fight to retain our green spaces, infrastructure and support for our community as a whole.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hulme, Christopher
Consultee Full Name	Dr Christopher Hulme
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS796
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 21:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>OBJECTING to plan SP17 as it is unsound due to the following reasons and negative impacts:</p> <ul style="list-style-type: none"> - As someone that has a keen interest in the invertebrates as well as amphibian wildlife in the area I have concerns over the impact on endangered animals. Not only the wild flowers and trees that will be destroyed hence ruining food webs for hundreds of species and relationships all the way from an Ant to a barn owl. There are species such as the great crested newt that call these areas their home that with the increase in development will interrupt these habitats and brings more pollution to the area that could harm them. - I am a keen explorer of the area and the fact that there will be increased traffic and hence noise, light and air pollution in an area of natural beauty. What are the measures to make this development eco friendly and how will you be sensitive to the needs of the area? more influx to the area will cause such disruption. - the schools, Drs, dentists and other local infrastructure is not made to support such a large development. Without further investment how do you expect them to cope. - you are building on a green site, why cant you build on areas of previous building or updating existing housing why are you building on areas that are suffering already. - The road network is already at capacity therefore then adding more cars to the mix will not help as well as the large increase in traffic to cyclists as well as other walkers in the area <p>Please carefully consider these points and their negative impact on us and the local environment.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Milburn, Liz
Consultee Full Name	Liz Milburn
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS804
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 19:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to strongly object to the proposed plan for the Thatcham NE development.</p> <p>For the following reasons</p> <ol style="list-style-type: none"> 1 development on green fields which we regularly walk on from Upper Bucklebury. This next to an area of AONB 2 disagree with infill to upper Bucklebury from Thatcham 3 impact of local traffic on Harts Hill and surrounding roads in Thatcham. 4 lack of schools provision in the area especially secondary schools 5 increased pressure on local services such as doctors and dentist <p>This proposed development is ill considered in my view, creating many addition problems in the local area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Billings, Carolyn</p>

Consultee Full Name	Carolyn Billings
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS808
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 22:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>I am writing to object to the planning application for 1500 - 2500 in NE Thatcham.</p> <p>My objections are based on the facts that components of this Plan that are completely unsound.</p> <p>1) Traffic will be greatly increased through the villages and completely unable to be handled by the exit roads. Access inadequate on already dangerous and busy roads.</p> <p>2) Education provision for all years is not clearly defined in the LPR and therefore there is no coherent end to end plan for this large new housing development and the Plan is untenable.</p> <p>3) The document gives no detail or insight into strategic healthcare planning for the. new development. WBC and the relevant HIA or provided evidence of having appropriately liaised with local health care agencies or providers. There is no plan to provide medical and dental facilities for the proposed 1500- 2500 new houses.</p> <p>4) With regard to the environment there is no evidence to support claims that SP17 will have a positive impact on the area. I do not believe it will have a significantly negative impact. The policy looks to build as many houses as possible in small areas. No attempt has been made to investigate and address the consequences.</p> <p>I therefore strongly object to the proposed development on the grounds that is unsound.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Billings, Kevin
Consultee Full Name	Kevin Billings
Consultee Organisation	
Agent Full Name	
Agent Organisation	

Comment ID	PS816
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 22:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing to object to the planning application for 1500 - 2500 in NE Thatcham. My objections are based on the facts that components of this Plan that are completely unsound. 1) Traffic will be greatly increased through the villages and completely unable to be handled by the exit roads. Access inadequate on already dangerous and busy roads.

	<p>2) Education provision for all years is not clearly defined in the LPR and therefore there is no coherent end to end plan for this large new housing development and the Plan is untenable.</p> <p>3) The document gives no detail or insight into strategic healthcare planning for the new development. WBC and the relevant HIA or provided evidence of having appropriately liaised with local health care agencies or providers. There is no evidence to provide medical and dental facilities for the proposed 1500- 2500 new houses.</p> <p>4) With regard to the environment there is no evidence to support claims that SP17 will have a positive impact on the environment. I believe it will have a significantly negative impact. The policy looks to build as many houses as possible in small areas. An attempt has been made to investigate and address the consequences.</p> <p>I therefore strongly object to the proposed development on the grounds that is unsound.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hamilton, Madelaine
<p>Consultee Full Name</p>	Madelaine Hamilton
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS820
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	02/03/2023 16:25:00

<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	

<p>Please give reasons for your answer</p>	<p>As a resident of Upper Bucklebury I am writing to lodge my objection to Thatcham North East Development based on the negative impacts this will cause as the proposals are illogical. Firstly as a resident on <personal details>, we have already seen increased traffic in the 13 years we have lived next to the traffic calming which results in poor behaviours from drivers who do not obey the priority and constantly hoot at each other at all hours of the day as they speed to slip through ahead oncoming cars. With the addition of a minimum of 1500 houses and the congestion on the A4 Upper Bucklebury will become a rat run to the motorway and the traffic calming will become a dangerous chicane. Additionally, the volume of traffic will mean it becomes dangerous to turn in and out of our driveway.</p> <p>The proposed traffic management is insufficiently and irresponsibly considered and will adversely affect road safety by channelling additional volumes through Harts Hill to Upper Bucklebury. The proposed feed on to Harts Hill will fundamentally change our rural village into a main carriageway similar to the A4. I had hoped to understand the traffic modelling for this junction but it does not appear to have been completed by West Berkshire. Additionally as a family of cyclists we already have to take great care on Harts Hill this additional traffic will create a much more dangerous environment for us, pedestrians in the village and local riders.</p> <p>Rather than increase opportunities for walking cycling these the proposals will have an adverse affect on current levels based on increased traffic and congestion. The council has failed to demonstrate how these increased opportunities will be created across all residents in the local area. Second,ly I would like to raise objection in relation to the impact this development will have on local environment. Wildlife wandering on the common frequently cross the already busy road- additional traffic will create further loss of wildlife. Increase use of the common based on inadequate provision of green space on the proposed sites will have a detrimental impact on ground nesting birds on the common will be impacted by increased traffic speeding through the common.</p> <p>The local area infrastructure is already at risk from flooding as demonstrated in recent months at the bottom of Harts Hill, water pressure is inadequate despite work completed for a new pumping station resulting in 2 burst water mains this winter alone on Broad Lane. The additional demands for water and sewerage as well as rain water run off onto the A4 will cause significant detriment to the local area.</p> <p>The Council's support of this development is expedient and ill-considered from lack of sufficient consideration of health care provision in line with current guidance from Public Health England. The current level of resources are already over stretched in terms of GP provision and Dentistry and the council and developers have demonstrated insufficient engagement with the integrated health bodies to reassure a genuine concern for the wellbeing of the additional new residents. The proposals in relation to education and school places are also inconsistent and vague and the developers suggested solutions to education requirements are platitudes to ensure approval. Please listen to local residents and reject this development which is over scales, poorly planned and detrimental to those in the surrounding areas.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes</p>	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Munir, Natalie
Consultee Full Name	Natalie Munir
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1050
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

LATE RESPONSE

I would like to formally register my OBJECTION to WBC LPR Regulation 19, the proposed development of 150 Thattham, as I find it completely unsound for the following reasons:

- 1 It will dramatically reduce the greenbelt between Thattham and Upper Bucklebury.
- 2 The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thattham.
- 3 It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and farmland. If large scale are approved there will not be any open rural areas left for future generations to enjoy.
- 4 The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain.
- 5 The view that Thattham is best placed to take a development of this size in this location is misplaced, un-proven and unrealistic.
- 6 According to the Transport Assessment paragraph 3.26, *'The access arrangements for the Northern end of the NE Thattham junctions on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause problems for this so I am unsure as to why this has been stated. Please can you share these with me? How can increased traffic on an already dangerous and busy road (without the development), be seen as not causing a problem?'*
- 7 I am also aware that there are drawings showing a new car park on Harts Hill. This again will increase traffic to an area which is highly likely to promote anti-social behaviour, illegal activities, fly tipping and littering which we see regularly on Bucklebury Hill.
- 8 In terms of *'reducing accidents and improving safety'* your assessment has concluded that *'the policy is likely to have a significant positive impact on walking, cycling and public transport as safe travel will be critical to the design of the site'*. Also regarding *'increasing opportunities for walking, cycling and public transport as safe travel will be critical to the design of the site'* your assessment concluded *'the policy is likely to have a significant positive impact on walking, cycling and public transport as safe travel will be critical to the design of the site'*. I wholeheartedly disagree with both of these assessments and I have concerns with the way the assessment was designed with these in mind'. Please can you provide me with the evidence and conclusions for both these assessments? Also, it's not just about the impact on the surrounding areas, villages and community which exist today and have done for years. What assessment has been done to ensure these with the increased traffic?
- 9 Further to the above, this development will have a significant impact on traffic levels and the associated pollution that will be increasing:
 - Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially along this road to the Primary School.
 - Traffic from Thattham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes.
 - Increased traffic through ALL the surrounding villages in general, especially as there is a plan for an exit at the top of the village. This will significantly increase traffic towards Upper Bucklebury, Chapel Row, Bradfield, Cold Ash and Hermitage. *'displacement of A4 traffic onto wider rural routes such as Upper Bucklebury'*. This is a total understatement and a significant danger for road safety, especially as the roads are already inadequate, have no pavements and are extremely dangerous. The potential for serious/fatal accidents is already high and this proposed housing development and exit will mean a significant increase in traffic on these roads.
 - Traffic on the route into Thattham and Newbury. These roads approaching the station are already heavily congested and a minor event of any minor traffic disruption will cause significant delays.
- 10 This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services which are overstretched.
- 11 Regarding healthcare, there is a significant lack of detail around strategic healthcare planning and the NE Thattham Development Consortium are aware, neither WBC or the developers have arranged or published a prospective Health Impact Assessment for this development. No engagement between the North-East Thattham Development Consortium and local general practises. Why hasn't a new GP site being available will result in the three existing practises in the area being overstretched even further? The fact that no evidence for the provision of a viable primary care medical facility. To add to this Thattham Dental Practice is providing dental care for the local population, this will also get worse with the proposed development.
- 12 Regarding the environment, there will be damage to the Bucklebury Plateau Biodiversity Opportunity Area and the surrounding landscape which is the common. This development will also destroy the enjoyment of the local countryside by local communities in terms of the Downs AONB and will cause negative impact to legally protected wildlife. There is no evidence to support claims that the development will have a positive impact on the environment but instead it will have a significant and serious negative impact on the overall sustainability of the area. Environmental sustainability is defined as: *'the ability to maintain an ecological balance and conserve natural resources to support the wellbeing of current and future generations'*. I am honest to say that WBC is not protecting the sustainability of our precious environment. In addition, as far as I am aware there is no evidence to analyse and address the negative environmental consequences. Why not?
- 13 Regarding education, within the Local Plan Review the provision for Nursery, Early Years, Infant and Secondary education is not clearly defined. The provision for Primary and Secondary school education is unclear and contradictory. WBC has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years has not been defined in the LPR. The plan for the schools needs to take priority and should be confirmed before any housing development is approved. It is highly likely that houses will be built and no additional school provision will be provided, leading to oversubscribed schools and a significant impact for our children. The LPR talks of provision of school fields however no evidence for funding or a suitable location (a sports field on a steep and air polluted A4 does not suffice as suitable) has been identified by the WBC or NE Thattham Development Consortium.
- 14 The development will significantly increase the noise and light pollution to the Bucklebury residents. There are no measures in place to mitigate this.
- 15 There is no evidence that this development will enhance Thattham town centre (or the area in general).
- 16 It is not likely to attract new businesses to the area or create or significantly increase employment.
- 17 The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development will reduce the number of customers.
- 18 There is now particular focus within the Consultation National Planning Policy Framework on taking into account the impact of housing on the environment. As a result of this, several local authorities have paused their

	<p>await the outcome of the consultation on the basis that a <i>lower housing requirement could be applicable to the plans planned for</i>. Although I am completely against the NE Thatcham housing development, I would ask that WBC should (have), to hold on the plan and present a revised plan in line with the updated planning guidance when this comes in.</p> <p>To conclude, this development is unnecessary, inappropriate, and ill-conceived and should be rejected.</p> <p>Please do not take the opportunity to live and play in our beautiful countryside away from our families today and future generations. The Thatcham housing development go ahead.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hamilton, Jacqueline
<p>Consultee Full Name</p>	Jacqueline Hamilton
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS832
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Letter
<p>Response Date</p>	28/02/2023 00:00:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As a resident of Upper Bucklebury I am writing to lodge my objection to Thatcham North East Development based on the cause as the proposals are unsound.</p> <p>Firstly as a resident on <personal details> we have already seen increased traffic in the 13 years we have lived next to the A4. I had hoped to understand the traffic modelling for this junction but it does not appear to have been completed. We are experiencing poor behaviours from drivers who do not obey the priority and constantly hoot at each other at all hours of the day as well as on coming cars. With the addition of a minimum of 1500 houses and the congestion on the A4</p> <p>Upper Bucklebury will become a rat run to the motorway and the traffic calming will become a dangerous chicane. As a result of this we mean it becomes dangerous to turn in and out of our driveway.</p> <p>The proposed traffic management is insufficiently and irresponsibly considered and will adversely affect road safety through Harts Hill to Upper Bucklebury. The proposed feed on to Harts Hill will fundamentally change our rural village to the A4. As a family of cyclists we already have to take great care on Harts Hill this additional traffic will create a much more dangerous environment for pedestrians in the village and local riders.</p> <p>Rather than increase opportunities for walking cycling these the proposals will have an adverse affect on current level of congestion. The council has failed to demonstrate how these increased opportunities will be created across all residential areas.</p> <p>Secondly I would like to raise objection in relation to the impact this development will have on local environment. We will frequently cross the already busy road- additional traffic will create further loss of wildlife. Increase use of the common of green space on the proposed sites will have a detrimental impact on ground nesting birds on the common will be speeding through the common. The local area infrastructure is already at risk from flooding as demonstrated in recent years. Hill, water pressure is inadequate despite work completed for a new pumping station resulting in 2 burst water mains the additional demands for water and sewerage as well as rain water run off onto the A4 will cause significant detriment to the local environment.</p>

	<p>The Council's support of this development is expedient and ill considered from lack of sufficient consideration of health guidance from Public Health England. The current level of resources are already over stretched in terms of GP provision and developers have demonstrated insufficient engagement with the integrated health bodies to reassure a genuine need for additional new residents. The proposals in relation to education and school places are also inconsistent and vague and solutions to education requirements are platitudes to ensure approval.</p> <p>Please listen to local residents and reject this development which is over scales, poorly planned and detrimental to the area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Darvell, Malcolm and Tammy
<p>Consultee Full Name</p>	Malcolm and Tammy Darvell
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS849
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	01/03/2023 18:52:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We are objecting to the North East Thatcham Development as, in our opinion, it has not been well thought through and is not in the interests of the community.</p> <p>We have lived in Upper Bucklebury for 25 years and all three of our children have attended the Kennet School and I am concerned about the overdevelopment of Thatcham for a number of years. The High Street is limited in what it offers and such that trips into Newbury/Reading are required if a person wishes to undertake anything other than food shopping. This causes congestion and pollution through increased road traffic. The catchment area for the Kennet is shrinking which is forcing people to travel further for their education. So the current proposed expansion of Thatcham will only compound the existing problems.</p> <p>Our objection can be summarised as follows:</p> <p>Environment</p> <ul style="list-style-type: none"> - The plans originally referred to two 'country parks' being contained within the Bucklebury Plateau Biodiversity Opportunity Area, but that this has been downgraded to community parks only. This is not consistent with protecting Bucklebury's ancient woodlands and rich biodiversity of the land encompassed by the proposed development. Promoting biodiversity requires resources and a downgrade reflects the lack of these basic requirements. - We also understand that the development is going to be located in the Wessex Downs AONB which will render it less suitable for nature. - Upper Bucklebury is likely to lose its independence and identity and therefore damage the community from siting the development, closing the gap between village and town. - The common is to be preserved and protected – we already have fly-tipping, burnt out cars and motor vehicles not to mention a substantial increase in the population is likely to worsen the negative effects of anti-social behaviour. <p>Transport</p> <ul style="list-style-type: none"> - An extra 4,000 people will generate a substantial increase in car ownership and travel. - The railway station is already challenged – the level crossing already impedes traffic flow and the A4 will become further congested.

	<p>- Of greater concern is the increased flow of traffic through Upper Bucklebury. Harts Hill Road is a narrow road with vehicles travelling the road that are too wide for the lanes. The development will have a negative impact on traffic flow and safety of pedestrians in the village. There is also the risk of creating 'rat runs' to avoid traffic on the A4 for drivers wishing to avoid the village.</p> <p>Education and Healthcare</p> <p>- As mentioned in our opening the Kennet School catchment area is already shrinking and will have a direct impact on children and their ability to access the closest schools.</p> <p>- Our understanding is that the increase in the number of children in the estate is unlikely to be sufficient to make a net gain, are these children to go?</p> <p>- Our understanding is that existing medical infrastructure (dentists and surgeries) is already under pressure. It is not possible to establish a new surgery for the extra people, so where are 4,000 people to go?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hinke, Caroline
Consultee Full Name	Caroline Hinke
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS861
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	01/03/2023 20:56:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Please find following my objections to the Thatcham NE Development Traffic Problems Without the council stating the potential locations of any additional primary healthcare and dental Care facilities or parking spaces, it is impossible for them to evidence the likely flow of additional traffic from this development in any direction. This must be taken into the existing road infrastructure assessed as necessary to accommodate it before this development is considered. I live in Midgham, which is accessed either end from via Cox's Lane or Church Hill. Both roads are barely adequate for the traffic. Cox's Lane is single track for most of its length, and the latter single track at certain points with passing places. These roads are already congested on the A4: Last year due to an accident on the A4 the entire length of Cox's Lane, Birds Lane and Church Hill were closed to find alternatives routes around the road blockage. These roads are already experiencing more traffic from new builds along the A4 and more locals new to the area especially with cars, on their bikes and walking dogs. It's almost impossible to make any journey now along Coxs Lane without encountering one driver or another having to reverse back to one of the few limited passing places. I use this road to collect my daughter to school, my journey now takes longer and raises the risk of a collision for every journey! These roads are heavily used by cyclists, horse riders, people and dog walkers accessing public byways and footpaths. It is unconscionable for any increase in traffic along Coxs Lane, Birds Lane or Church Hill without an unacceptable risk of injury to me, other humans and animals. I'd like to see modelling that shows there will be no increase in traffic along these roads impacting on their current use for recreation, leisure and sustainable commuting by bike by the local community. When I try to exit either Coxs Lane, or Church Hill to turn right to travel towards Thatcham, I have to wait for up to 5 minutes to find a safe gap in the traffic. And the risk of a collision is high because there is a constant stream of drivers using the road between Newbury and beyond. This road simply can't safely accommodate any increase in traffic.

When travelling to Thatcham, I use Hart Hill and Floral Way. Harts Hill has several dangerous blind bends and a steep dip in icy conditions. Floral Way is heavily congested during rush hour traffic. It would be good to see the traffic modelling and in particular any safety assessment done on the risk to other road users of having junctions on these roads? I am going to encourage safe and sustainable commuting: riding a bike down Harts Hills will be even more perilous? How will this development have a positive impact on walking, cycling and public transport? I note the proposal for a car park on Harts Hill. For what purpose? I'd like to see the council's traffic modelling at the various bottle necks in the area during peak traffic to see what the impact will be at different times of the day (all modes), safety & emissions from this development?

Environment

I note the plan makes reference to providing green space and playing fields for the new households, but again no details. If schools will open their playing fields to the general public is not feasible due to H&S, safeguarding, maintenance issues. If these are not provided, new households will gravitate to other green spaces in the area, increasing traffic in areas around the flora and fauna. There are already a high number of deer, badger and kites struck by traffic on the roads around Thatcham. I fear this will increase with more traffic flowing through our local roads.

We need a thorough impact assessment to be done on the impact the NE Development plan will have on local flora and fauna. I and other walkers will also lose access to the popular footpaths from Coxs Lane leading to Colthrop and Upper Bucklebury. We will be able to access these areas safely on foot with our animals without these footpaths? This development will limit my access to the countryside I currently enjoy and will impair my ability to enjoy it as a local citizen. I'd like to better understand how the council will support the local community for what it will lose in footpath access to areas we currently enjoy?

Primary & dental care

I am registered at Chapel Row surgery. The medical facility is stretched to capacity with long waits to see GPs in particular. The surgery operates reduced hours due to demand and recruitment problems - what plans have been created for additional primary care facilities to meet the needs of these additional households? Not a generic statement that the needs will be met, but something more substantial. What facilities will be, the size, feasibility of resourcing them and so on. For example, if local facilities struggle to resource themselves, how can we overcome with any new practices?

House price devaluation/other options

Many home owners here have paid a premium to live on the doorstep of an AONB: to benefit from the peace & quiet, and to open countryside. What consideration has the council given to changing the character of this local area and the impact on our properties?

There are thousands of individual building plots sites which could spread the load of this proposed housing development across the county for new housing development within the country without degrading the rural landscape.

The council must surely have access to a register of potential individual building plot sites within the county that it can use to identify developments in greenbelt areas as part of its due diligence? Will this be shared?

This should form part of the consultation documentation.

Consultation

I find this entire "consultation" to have been discriminatory. I'd like the council to evidence that fact that they have done everything possible to get local residents like us informed, engaged and able to contribute before this plan goes any further. I think the council has who've gone over and beyond to explain things to us in a way we can understand as best they can. Something our local council has not.

May I also ask why the exit onto Hart Road at the proposed North of the site was only revealed to the local community at the last minute, the fact, and the impact this will have displacing traffic through Cold Ash, Bucklebury & Chapel Road (rural roads) would have been known to residents to get involved.... had they known.

These facts, the inaccessibility of the planning documents and the late disclosure of key facts makes this application

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Champion, Robert
Consultee Full Name	Mr Robert Champion
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS891
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 13:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I appreciate the need for additional homes in the west Berkshire District, but the plan to build a substantial number of test. In my view homes should be built where there is a economic requirement for them and they add to the local economy.</p> <p>If either of these tests are failed the new housing development is a drain on the economy instead of being an addition to the local economy and new population.</p> <p>To achieve these aims the strategic plan should concentrate on improving transport links; (here Thattham Station and its link to the Motorway network without driving through Newbury is a requirement for a town the size of Thattham to flourish) education both child and adult; health provision; and shopping and leisure facilities (what are the plans for Thattham to cope with increased population).</p> <p>Under each of the above points an adaption of Cat Steven's song "where will the Children Play" is required.</p> <p>Without strategic plans covering these issues, Thattham will become a place where people live with no attachment to the place in no one's interest. Only when these issues have been addressed can the siting of additional homes be addressed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Butcher, Allison
<p>Consultee Full Name</p>	Allison Butcher
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS961
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:25:00
Attached Files	PS961 Allison Butcher Map attachment.png
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	I am a resident of West Berkshire, and have been living in the parish of Bucklebury for the last 21 years. I am writing to the revised LPR, specifically under policy SP17, the NE Thatcham housing development. This plan is <u>unsound</u> and paused.

I wrote to you in January 2022, under the Regulation 18 Consultation. I am deeply disappointed that my objections and others in the parish, have not been taken into account in any meaningful way in the development of the revised LPR. WBC has made much of the 'reduction' in the number of houses in the Plan since Regulation 18. However, the number is now "at least 1,500". From an initial site assessment of 2,500, of which 1,250 were to be built in the Plan period, to 1,500 houses because the Plan extends to 2039 rather than 2036, as originally proposed. The boundary for the development suggests that more houses will be planned for later on.

As noted in my previous objection under Regulation 18, this plan removes the strategic gap between Thatcham and Upper Bucklebury will effectively merge and Upper Bucklebury will lose its rural identity. This removal of the strategic gap affects other villages in this area of West Berkshire.

There are also questions around the selection of North East Thatcham, which ignored the Thatcham Vision and omitted a green field site instead of the numerous brown field sites which are available. The latter are more sustainable and affordable for housing. I am also astonished that the clear impacts of climate change, exacerbated by building on green field sites, were not given consideration.

1 Objection to the revised LPR on the basis that it is unsound

As WBC is aware, a consultation is currently taking place for proposed changes to the National Planning Policy Framework. The tests are set out in paragraph 35 of the NPPF. This states that plans are 'sound' if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs in co-operation with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so as part of sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters, rather than deferred, as evidenced by the statement of common ground;

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this plan and national planning policy, where relevant.

The LPR is unsound and fails against each of the above tests in many areas of the plan:

It is **not positively prepared** and would not achieve the goal of sustainable development for WBC and the wider Thatcham area.

It is **not justified**. Many of the grounds for assessment of impacts and benefits lack credibility and it is not based on a realistic assessment of alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham is a strategy for WBC.

It is **not effective**. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable over the plan period.

It is **not consistent with national policy**. In many instances the allocation for development of North East Thatcham conflicts with national policy, particularly in relation to landscape character and impact upon the AONB. The process for development under policy SP17 through the sustainability appraisal is fatally flawed and is not a matter which can be easily corrected to the plan. The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.

2 Specific objections

2.1 Process and timings on the Local Plan Review Consultation

On 6th December, the Secretary of State for Levelling Up, Housing and Communities released a Written Ministerial Statement on amendments to the NPPF.

He stated specifically (inter alia) that 'local authorities, working with their communities, should determine how many homes to plan for, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character of an area ... Also that 'the Planning Inspectorate should no longer override sensible local decision making, which is sensitive to local needs and concerns'.

The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March, 2023. The Consultation states that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version) is **mandatory** and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on character of an area when assessing how much housing can be accommodated.

Since this announcement, several Local Authorities have paused their plan-making process whilst they await the outcome. On this basis, it is unacceptable that West Berkshire are continuing to consult on the current version of the local plan and are not bringing the final version of the plan to be brought back to them for approval before it is submitted to the Planning Inspectorate.

We feel that the council should take the opportunity, as other councils have, to **pause the plan**. The LPR is not ready to be submitted until councillors are satisfied that it passes the statutory requirements of Section 20 of the Planning and Compulsory Purchase Act 2004.

2.2 Impact on Traffic and Transport

A recurring theme from Bucklebury residents at Regulation 18 was that of **increased traffic** through the villages. We were led to understand by WBC planners that traffic from the development would link to Floral Way and the A4. It is apparent on 6th January (WBC Phase 2 Transport Assessment Report, July 2021) there was also **a plan for an exit from Harts Hill**. Traffic from, or to, the site therefore will only go in one direction from this exit – **towards Upper Bucklebury** and traffic going through Cold Ash and the traffic through Upper Bucklebury and Chapel Row.

The proposed development will funnel traffic from the proposed development and, **WBC predicts**, - '**some displacement of rural routes such as Upper Bucklebury**'. This would be where the roads are inadequate, without pavements and are prone to accidents. See also below on 'increasing opportunities for walking and cycling'.

Paragraph 3.26 of the Transport Assessment reports states: '*The **access arrangements** for the northern end of the **junctions** (with right turn lanes where appropriate) on both Floral Way and **Harts Hill Road**. Results from the model cause problems*'. However, the document has **no** modelling results for this. There are drawings for all the other proposed junctions on Harts Hill one, which begs the question – why not?

We have also seen drawings showing **a new car park on Harts Hill**. The purpose is entirely unclear but will certainly be a part of what is already a dangerous road, on a gradient and with several blind corners, and may also promote the need for a car park too apparent in the car parks on the Common.

In the light of the above, Objective 4 in The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) provides opportunities for all forms of safe and sustainable transport' would certainly fail to be achieved.

The SEA makes the following assessments:

- '**To Reduce Accidents and Improve Safety**'

WBC Assessment - The policy is likely to have a Positive Impact on road safety as safe travel will be critical to the success of the development.

- 'To increase opportunities for walking, cycling and use of public transport'

WBC Assessment – Significant **Positive Impact**

WBC Commentary - *The policy is likely to have a significant impact on walking, cycling and public transport as the design of the development takes these in mind.*

WBC states that sending traffic up a hill already notorious for accidents, onto 'wider' rural routes (no pavements and no cycle lanes) and cycling will be encouraged, will have a positive impact on road safety.

It is hard to see how WBC assessments and commentary on road safety can be taken seriously.

Finally, BPC recently commissioned a **Traffic Study** which was undertaken by YES Engineering.

The headline conclusions of the Study are:

- The trips rates used by WBC are **unreliable and not robust**.
- The trip distribution is unrealistic (all evidence suggests traffic will be diverted from the A4).
- The mitigation measures are improbable at best.
- The location of site means car-borne travel will dominate.
- Highway network in the vicinity of Thatcham Northeast is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic.
- Increase in traffic through Bucklebury will pose highway safety issues.

WBC's responses to the SA/SEA Objective 4 would appear to be based on no substantial or current evidence.

2.3 Healthcare Provision

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to refer to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is **no detail or insight** into strategic healthcare planning.

Proposals for a major development that is likely to have a significant health impact in relation to its size and location, should be subject to a **Health Impact Assessment (HIA)** in accordance with the current guidance from Public Health England. However, it is unclear how the proposals for development have been discussed with health service providers regarding impacts on primary care. All development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the development. The impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that **neither** the public and private stakeholders respectively, **appear to have arranged or published a prospective HIA specific to the Thatcham development.**

Tackling health and wellbeing requires a **multi-agency approach**. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to meet the requirements associated with new development. It is of concern that **there appears to have been no direct engagement with the Berkshire West Healthcare Consortium and local general practices.**

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand. Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is a shortage of GPs in other areas of the country. There is therefore **no realistic prospect of a new GP practice being established in the area in the foreseeable future.**

GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable. It would be possible to extend the range of services and primary healthcare professionals available on a single site. It would make **no financial sense for an existing local GP practice to set up a branch surgery** on the proposed new development because of the additional costs and staffing costs and encumbrance working across two sites.

There has been **no approach by WBC or the developers to any local GP practice to discuss an appropriate site for a new practice** which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located in the centre of the development to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the development. The site to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. The site was identified with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2021. The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Medical Centre (Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). **All three practices are run by two Thatcham doctors' surgeries** run independently of each other, and their combined lists include approximately 2700 patients under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on primary care as there are more young children, a higher maternity workload, less local extended family support and there is initially a high demand for permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care. **Thatcham dental practices** are unable to provide dental care for the whole population with a significant minority of patients having to travel afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents have access to a dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have consulted any local dental practices regarding the potential impact of increased workload resulting from additional housing. Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates 2016), paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in 2016.

no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at health centre.

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having any health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and to mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope.

The objective of WBC and the North-East Thatcham Development Consortium to improve access to the health service infrastructure has not been met as they have **not provided evidence for the provision of a viable primary care centre**.

2.4 Environmental Issues

BPC and parishioners have identified a number of **serious environmental threats** posed by the proposed Thatcham development site (SP17). These include:

- 1 Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area (*see map below) and its ancient woodland the Common;
- 2 Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB and the open countryside by local communities;
- 3 Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient mitigation will be taken after development e.g. through the vague promise of a 'community park'.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the development, the conclusion is that **there is no evidence to support claims that SP17 will have a positive impact on the environment or any other reason to believe it will have a significantly negative impact.**

For example, the WBC states in the LPR that a Sustainability Charter is required to establish how 'policy requirements for legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability). It is *informed by* various strategy documents (including one on ecology). Yet, the strategy documents either do not exist or are not available for the Regulation 19 consultation.

We (BPC) estimate that at least 4,000 people will be concentrated in the development site. They of course must have access to recreation and general wellbeing. We do not believe that the claimed provisions for green space will satisfy this demand. The Growth Plan had a vague proposal for two 'country parks' spaced across the top of the slope, inside the Biodiversity Opportunity Area, with potential for significant biodiversity enhancement over its current land use. No details were provided about how they would be delivered. The study showed the complete lack of preparation for such country parks, not least that they should be merged, and provided to deliver that stated biodiversity enhancement. Now, in the updated SP17 text, the country parks have been downgraded to 'country parks' which demonstrates how little commitment WBC has given to protecting the natural environment and public enjoyment.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be impacts on adjacent areas.

Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a growth plan which will 'take advantage of the landscape' to 'facilitate connection to the AONB, and include leisure routes accessible to the public'.

Meanwhile, the management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the site, working to restore and nurture.

In fact, the LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability on the site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated. There are no details on any such mitigation measures: the assumption is simply that they will somehow be found during the planning application process.

However, the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact on the environment, absurdly ignoring the environmental consequences in favour of social and economic benefits that are anyway highly unlikely to be realised.

As noted already in my response, it is hard to see how such documents can be taken seriously when contradictory information is offered.

The overall thrust of the SP17 policy is clearly to build as many houses as possible in a small area of countryside, with the hope that the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on consultation and plans and justify the 'growth' requirement, there is no evidence of any serious attempt to investigate, analyse and systemically assess the impact. Everything will be all right because WBC's own unsubstantiated policies say it will be.

<Map attachment here: PS961 Allison Butcher Map Attachment>

2.5 Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is **not clearly defined** in the LPR. The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is difficult to assess the subsequent impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the Thatcham area, not considered in the traffic plans and models in the LPR.

There are **no details** in the LPR of the provision for **Nursery or Early Years** education. Policy SP17 NE Thatcham Development states that 'the site will provide Early Years provision'.

The provision for **Primary** school education is **unclear and contradictory**. There is no data or evidence on the plan for primary school entry requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. No data available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state how many school place provision. Clearly, schools need to be available before houses are built.

The LPR is **inconsistent, incomplete and contradictory** on the provision of **secondary schooling** in and around Thatcham, in contradiction to the supporting documentation in the Thatcham Strategic Study 2020. It proposes that the sum of £12 million be contributed by developers to Secondary Education. There are **no details of the location of the land** to be provided and hence no possibility of assessing the impact.

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new (Form Entry) secondary school, half-funded by developer contribution. **Government guidelines are that Secondary schools are not sustainable.** However, the Development Plan states that the **NE Thatcham development** (which proposes a new secondary school) is **sufficient to fill a 6–8 FE school**: Specifically :-

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The proposed site proposed is not sufficient on its own to fill a 6-8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. It is not considered feasible for a new school to be smaller than 6FE.

With an alleged 40% 'reduction' in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school is not sustainable in this location.

Again, WBC's own documentation contradicts itself.

Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on a **study in 2011**. Clearly the use of 11 year old data is inadequate. The Development Plan states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future population demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably education provision will be considered in more detail as any development comes forward.

The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for a secondary school.

In summary:

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education for all children.

West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision across all school years. This duty is **not defined or evidenced in the LPR.**

2.6 Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the road, the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If not, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public due to other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide **sports fields has not been evidenced for funding or for a suitable location.**

3 Conclusions

The LPR is unsound. It fails against each of the existing tests of soundness as set out in paragraph 35 of the current National Planning Policy Framework (NPPF).

WBC should **pause the plan**. The LPR is not ready for examination and should not be submitted until councillors are satisfied with the statutory requirements of Section 20 of the Planning and Compulsory Purchase Act 2004.

Bucklebury Parish Council has submitted its Representations (Regulation 19) to WBC this week. I have paid close attention to this comprehensive response as it has been drafted, and I wish to endorse the objections, comments and arguments.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mills, Christopher
Consultee Full Name	Christopher Mills
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS798
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 21:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I strongly object to the above plans which are unsound for, amongst many others, the following reasons:</p> <p>You and we have already - from previous developments - experienced the increased environmental and financial cost to protect ourselves and others on the other side of the A4. We can all only guess at the level of destruction that would be required to appear just a few people actually care.</p> <p>After so many environmental mistakes and continuing international strife during our lifetime, surely most of us have a duty to our generations to find ways of protecting our remaining beautiful land here.</p> <p>Few have commuted by bike for as long, often or much as me, both here and in central London. And I have, for at least 10 years, a journey from Thatcham heading east is the stretch of road on which my bike and I already have the highest probability of being killed or seriously injured you to try it at various times to see how dangerous it is. Yet more development will just shorten the odds for me and others to believe a cycle lane were feasible for that stretch, but I find it hard to imagine a solution that could properly safeguard the area (reducing heavy traffic.)</p> <p>The wildlife and bucolic attention around this development seem to be derisory. Thatcham may be the oldest (and one of the oldest) continuously inhabited places in Britain. Misguided developments have already taken place (and some of poorest infrastructure developments. It is hard not to conclude that the proposers' thoughtless actions have messed up massively already there; people might not complain about our making it even worse.</p> <p>I could go on but I trust you agree with my strong belief that the application should be refused. We can all pretend that we can make huge differences to the future of our world. But I hope you agree that that is wrong and just a poor excuse.</p> <p>I am happy to appear at the public enquiry if invited.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kent, Debbie
Consultee Full Name	Debbie Kent
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1042
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 15:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan to build up to 2,500 homes as I believe it to be unsound and will have an extremely negative impact on the environment.</p> <p>As a resident of 40 years in Upper Bucklebury, I have noticed natural, minimal infill development and a couple of very nice village's character. This has inevitably added traffic movements locally, however this is minuscule compared to proposed development on green field land in a designated Area of Outstanding Natural Beauty in the North Wessex Downs.</p> <p>The traffic movements would vastly increase, bringing more vehicles up Harts Hill Road and through the village. This would impact on the cycle path at all or pavement for pedestrians until it reaches Upper Bucklebury. At the Eastern end, Cox's Lane is a narrow road with many passing places.</p> <p>The area is home to legally protected wildlife which would be displaced. Building on agricultural green fields used for agriculture cannot be advisable.</p> <p>The settlement of Thatcham will merge into one long development and our village will lose its identity if this plan goes ahead. More vehicles for work, school and leisure the roads will become more congested. The A4 is already clogged at peak times. Bucklebury will become a rat run.</p> <p>The NHS does not have a policy of creating new GP surgeries as part of its strategy. Current patient lists at existing surgeries are full. The addition of several thousand more patients will break the NHS locally, putting patients even more at risk of not receiving care.</p> <p>Bucklebury Common has an ecosystem which is important, nationally and risks increased footfall and resulting damage to the common.</p> <p>What is the purpose of the car park proposed on Harts Hill Road? Car parks in Bucklebury are already used for anti-social behaviour. A new car park will provide another location for this illegal activity.</p> <p>While all these extra people will need access to green space, creating a 'country park' is not to the benefit of the existing village. Further development.</p> <p>Please reconsider.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pat, Bodsworth
Consultee Full Name	Pat Bodsworth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS728
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to WBC LPR Regulation 19 Plan Policy SP17 for the following reasons:-</p> <p>1. Traffic</p> <p>I'm concerned that the volume of traffic through Upper Bucklebury will increase significantly as a consequence of the development.</p> <p>Traffic from the new development will inevitably use the route through Upper Bucklebury as an alternative to using the main road, particularly if there is an exit at the north of the development onto Harts Hill road.</p> <p>There is also in the plan a proposed car park off Harts Hill road which will add to the problems of a road which is already subject to a high volume of traffic.</p> <p>2. Consequential Damage to Bucklebury Common</p> <p>With the number of additional people who would be within easy reach and access of Bucklebury Common it would lead to the degradation of the habitat of the common and lead to unsustainable damage to an important eco system of national importance.</p> <p>3. Environment</p> <p>This is a development of "green" land which has a high elevation and abuts an AONB which would have an adverse effect on the area and biodiversity.</p> <p>4. Pressure on Medical and Complementary Services</p> <p>The medical and complementary services in the area only just cope at the moment so with the proposed development and the increase in people requiring these services it would inevitably lead to a significant deterioration, more specific detail of additional services is available on request.</p> <p>5. Lack of Strategic Gap between Thatcham and Upper Bucklebury</p> <p>The development will significantly decrease the green gap between Thatcham and Upper Bucklebury and could set a precedent in the future resulting in Upper Bucklebury becoming part of Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Martin, Simon
Consultee Full Name	Simon Martin
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS744
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Traffic</p> <p>Given the number of homes proposed (although this seems unclear as to what the maximum number will be), even if equate to thousands of daily trips on the local road network, which is already busy. This does not include daily deliveries. The A4 through Thatcham is congested at peak times, and there are already large queues in and out of Thatcham village.</p> <p>The homes are located in such a location that to access Thatcham's amenities, schools and doctors for example, people are more likely to walk than walking or cycling along the A4. The council have assessed a "Significant Positive Impact" with "The policy is likely to have a significant positive impact on walking, cycling and public transport as the development should be designed with these in mind." Having worked on other schemes it is quite clear that despite putting in token footpaths and cycle paths, the development is effectively separated from the A4, and people will drive almost everywhere. Despite what studies may demonstrate, they never account for the reality of how to see how hard it is to park in Thatcham Broadway for example, to see how everybody drives to Thatcham's shops and services.</p> <p>The proposed junction on Harts Hill Road is particularly concerning. This will encourage people to travel up a narrow road, Upper Bucklebury in order to use unsuitable lanes for their journeys. Living in The Slade, I am very concerned that people will then turn left onto Broad Lane to travel towards Cold Ash and the A34 at Chieveley, or use very narrow lanes such as Broad Lane to head towards Yattendon and other villages. These lanes are Bucklebury Quiet Lanes, and are used by walkers and cyclists. They are very narrow, often in poor condition and not suitable for an increased number of car journeys, let alone vans and trucks.</p> <p>The junction between Harts Hill Road and Broad Lane is accessed by driving past two car repair businesses and is used by delivery vans due to parked cars. The junctions from The Slade and particularly Holly Lane are difficult with limited visibility, and a speed limit will be dangerous.</p> <p>I cannot see how increasing the number of car journeys by a poorly developed scheme is consistent with West Berkshire's aim of net zero emergency or being on a journey to net zero. This scheme shows no progression from the housing developments developed in the area where large numbers of houses were simply built in a field.</p> <p>The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Plan covers the area of North East Thatcham against key Sustainability Objectives. Objective 4 is – To promote and maximise opportunities for sustainable transport. The SEA makes the following assessments:</p> <p>'To Reduce Accidents and Improve Safety'</p> <p>Council Assessment - The policy is likely to have a Positive Impact on road safety as safe travel will be critical to the success of the development.</p> <p>How can increasing number of vehicle trips on the same roads improve safety can reduce accidents? This is nonsense.</p> <p>'To increase opportunities for walking, cycling and use of public transport'</p> <p>Council Assessment – Significant Positive Impact</p> <p>Council Commentary - The policy is likely to have a significant impact on walking, cycling and public transport as the development will be designed with these in mind.</p> <p>Any study can show what you want it to show, but as discussed above, the location of the site will not have this positive impact be challenged.</p> <p>Healthcare</p> <p>Having lived previously in Thatcham and having family there, I am aware how oversubscribed and busy the dentist, GPs and other services. My son was recently taken ill and we were told to go the West Berkshire Community Hospital; however, we were told that a child specialist was available. We therefore had to drive to Basingstoke A&E.</p> <p>One can only conclude that the current healthcare provision is at best stretched, and therefore given that this proposal contains no details on the provision of primary health care, the proposal is flawed and cannot be considered to be commensurate to place an additional burden on existing healthcare providers, and to reduce the quality of care available to existing residents.</p> <p>Environment</p> <p>Firstly, it beggars belief that the proposal even considers siting so many homes on a hillside in front of the North West Hill. The view will be lost forever.</p> <p>Losing greenspace and farmland to this development flies in the face of current thinking on sustainability and sensitivity. It is an attempt to tick the box of providing a few thousand new homes, whatever the environmental cost. House building is a major contributor throughout the process and supply chain, and is a major contributor to carbon emissions. How does this align with our</p>

	<p>and targeting net-zero? Given the proposal only proposes “community parks”, this hardly represents an effort to mitigate habitats which will be caused by this development.</p> <p>In The Slade and Bucklebury Common, the impact of visitors is felt in numerous ways including (but not limited to):</p> <ul style="list-style-type: none"> • Littering; • Setting fires (accidental and otherwise); • Dogs out of control disturbing ground nesting birds or attacking deer (I have witnessed this myself); • Dog fouling; • Car parking on verges; • Walking off public rights of way; • Trespassing on private property; • Illegal off-roading by vehicles. <p>The management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the fragile environment to restore and nurture.</p> <p>By placing these new homes closer to Bucklebury Common than the existing residential areas of Thatcham will only given no proposals have been made to provide recreational areas that can be used without destroying fragile environment.</p> <p>The development will only have a negative impact on the local environment, and in no way is it shown to be sustainable for the local landscape. This proposal should therefore be disregarded and a proper solution for housing in West Berkshire should be better thinking than building thousands of homes on green space.</p> <p>In fact, the LPR’s own Sustainability Appraisal accepts that SP17 will have a <u>negative</u> impact on environment on a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated by whatever whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the process.</p> <p>However, the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact –this does not make sense.</p> <p>Education</p> <p>The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR. There is no coherent end-to-end plan: this therefore breaches the Council’s obligations to provide education for all children. Having young children currently at primary school age or below, I am extremely disturbed that the proposal does not state what provision will be provided.</p> <p>We are in the Kennet and Downs schools catchments, but closer to Kennet. Should these homes be built without any other new development will take preference to children from Bucklebury for places at Kennet due to distance. This leaves children who are far from Downs, there is a chance we then end up with no place and our children could end up having to go anywhere else.</p> <p>There is also no resolution as to the issue of school playing fields. As the site is on hillsides, the only flat area would not be acceptable due to traffic emissions.</p> <p>Therefore this proposal is flawed as it does not demonstrate how school and playing provision will be made.</p> <p>Timing of the Review</p> <p>The NPPF consultation was launched just prior to Christmas 2022 and will run until 2nd March, 2023. The Consultation states that the Standard Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version) is mandatory and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on the character of an area when assessing how much housing can be accommodated.</p> <p>Therefore the numbers need to be reassessed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Their own conclusion states: ".1 For many topic areas the Western Berkshire Councils Statement of Common Ground (WBCSoCG) is still a valid and relevant document. West Berkshire Council considers that it can meet its own local housing need. However for employment uses there is still some work that needs completing before we submit the plan and it is hoped that a statement of common ground on the topic. Although not discussed in detail in this paper the input from and coordinated work with the intention to enter into a statement of common ground with them before the LPR is submitted to the Secretary of State. Their work with the council has covered responding formally to Regulation 19 and blue infrastructure as well as the recently important nutrient neutrality and Habitats Regulations Assessments"</p>
<p>4. Proposed Changes</p>	<p>The LPR is unsound in many areas and the following need to be addressed:</p> <ul style="list-style-type: none"> • Traffic/transport - proof that the development will positively improve walking, cycling and public transport, and improve air quality. • Healthcare - the proposal needs to demonstrate the real strategy for delivering appropriate healthcare for the town. • Education - the proposal needs to demonstrate how education will be provided. • Environment - the Sustainability Appraisal needs to be consistent on impact of sustainability, and demonstrate how it will be mitigated.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thomas, Philip
Consultee Full Name	Philip Thomas
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS736
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	01/03/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object to the plan. I find it to be unsound for the following reasons:</p> <p>Environment I have lived in Upper Bucklebury for 35 years. This is within a designated Area of Outstanding Natural Beauty. I believe proposed for a large part of the development will be destroyed for ever and that there will be detrimental impacts to p seem to be any evidence of a positive impact on wildlife nor proven plans for providing adequate green space and protecting biodiversity. The two "country now been downgraded to "community parks". There appears to be no evidence of any sound attempt to investigate, analyse of such a development.</p> <p>Transport There appears to be a plan for an exit road at the north of the site onto Harts Hill Road. This is a challenging road, e are no modelling results for this proposed junction. It would appear that some of the displacement of A4 traffic will, the Bucklebury. The roads into, out of, and within the village are mainly unsuitable for large volumes of traffic and this increase in tra consider this to be a major risk of danger and could lead to loss of life. The council assessment of the proposal is a significant positive impact on reduction of accidents and safety. Flow is</p> <p>Healthcare There appears to be very' little detail into strategic healthcare planning; neither WBC nor the developers, appear to h prospective HIA specific to the proposed North-East Thatcham development. It seems that there is no direct engage Consortium and local general practices. When considering how new GP practices are commissioned by NHS England. alongside the fact that it would appear to or geographic sense for an existing GP practice in the area to set up a branch surgery, it seems unlikely that approp in a timely fashion, if at all. Surely this complicated and essential provision cannot be left until the development is ap Dental practices in Thatcham are under severe pressure to provide care for existing residents. Pharmacies in the are provide an adequate service. WBC and the developers appear to have neither arranged a relevant HIA nor provided liaised with local health care agencies or providers.</p> <p>Education Provision for education for the whole age-range is not clearly defined. Secondary school provision appears unsound of pupils; location of a school; the timing of necessary funding: the provision of necessary funding. The development plan states that the development is not sufficient to fill a 6-8 FE school. It would to be smaller than 6FE. Bucklebury children would probably no longer have a choice between the Kennet School and the Downs School for There are no details in the LPR of the provision for Nursery or Earls' Years. The provision for Primary education is un how can this proposal go forward without significantly increased information, research and assurance of the necessa In summary, it appears that, in order to meet an arbitrary' target for new development an easy option has been propo area only.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Turford, James
Consultee Full Name	Mr James Turford
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS933
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would like to object to the Thatcham NE Development as currently proposed.</p> <p>I have thought carefully about whether it is appropriate to object to such a development. In general, I believe in the UK country to meet the UK's housing need. I also think that the edge of Thatcham is probably a good place for modest, proportionate development.</p> <p>However, having studied the plans <u>I don't believe that the current proposal is modest or proportionate or well considered</u>.</p> <p>Once complete, the development would increase Thatcham's population by nearly 20%. This seems to me to be totally unnecessary to meet the organic population growth of Thatcham and surrounding areas.</p> <p>Additionally it appears that there has been very limited detailed planning to address the large increase in demand for roads and green space. This will inevitably affect the provision of these already stretched essential services.</p> <p>To repeat, I'm not against new development around Thatcham, however only if it is significantly scaled down from the current proposal.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Milburn, David
Consultee Full Name	David Milburn
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS937
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 18:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposed plan for the Thatcham NE development.</p> <p>As a local resident, my wife and I frequently enjoy walking in the lovely areas surrounding Bucklebury. We are very concerned that the proposed development would destroy the area of countryside and the beautiful environment to the south of Upper Bucklebury. We often walk from Long Grove across to Midgham through the fields and nearby woodland with lovely views across the hills. These views would be destroyed and would result in paths through a giant housing estate.</p> <p>It is completely inappropriate for there to be such a large development adjacent to ancient woodland and areas of Ancient Woodland. The proposed development would significantly infill the area between Thatcham and Bucklebury, reducing the separation between the two villages. This would have a significant impact on the local biodiversity around our village. The size of this proposed development is not appropriate.</p> <p>I am very concerned about the impact on local traffic. Harts Hill road already carries excessive traffic, and this proposed development would add more pressure on Harts Hill road and add to delays at the junctions with Floral Way and the A4, and the enormous delays caused by the frequent occurrence at Thatcham railway level crossing.</p> <p>I am also concerned about the extra pressure this proposed development would place on our local doctor and dentist surgeries. The facilities contained within the development proposal are unsound and unsatisfactory.</p> <p>I strongly object to this major greenfield development proposal.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucknell, Jane
Consultee Full Name	Jane Bucknell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS769
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	27/02/2023 21:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As a long term resident of <redacted> Bucklebury, I am very concerned about the negative impact the Proposed Development have on our village and many other small surrounding communities in this area.</p> <p>We are fortunate to have lived in this AONB which is enjoyed by,not only residents of the area,but also many visitors. 1500 -2500 new homes on the edge of this AONB, with a subsequent population of thousands, will change the area to a busy congested suburbia.</p> <p>For a start, the increased traffic along our narrow, hedged lanes with few footpaths is just not possible without compensation and lanes are used by many cyclists and ramblers not just from our area, The local wildlife will also be impacted trying to conserve our World</p> <p>Also we have enough trouble making appointments at our overstretched GP surgeries and hospitals now, let alone with The NHS suffers already trying to cope along with other medical centres such as dentists etc</p> <p>Educating these inevitable extra children from the new development is also a worry, not only finding room for them in but how to cope with the extra traffic at certain times of the day .</p> <p>From what I understand several of the above concerns I have mentioned have not been thoroughly examined and as a result – why such a huge development in such an unsuitable area ? I f we don't protect and preserve our small West Berkshire villages will be lost forever for future generations.</p> <p>After all, a Government Statement recently detailed that the housing number should now be advisory and not mandatory that planning should no longer override sensible local decision making, which is sensitive to and reflects local restrictions. I trust that you will take my objections in to consideration ,as they represent the thoughts of many local residents that</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Claffey, Katharine
Consultee Full Name	Katharine Claffey
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS790
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 19:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to the proposed build of 1,500 to 2,500 houses on North East Thatcham. This is because the component would have a negative impact on me for the following reasons:-</p> <ul style="list-style-type: none"> - Healthcare - there does not appear to have been a Health Impact Assessment and there does not appear to be an additional GP practice or NHS dental practice. It is currently very difficult to get a GP or Dental appointment without a town. - Traffic congestion - frequently traffic on Floral Way and the A4 is heavy particularly in the mornings at rush hour. As schools are built, one can only assume absolute gridlock at peak times, and an increasing the risk to children travelling to and from schools. - Sports Field Provision - there has been no evidence provided for the funding or for a suitable location. - Education - The provision for secondary school places is unclear and unsatisfactory. Secondary school places with are limited.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Watson Stubbs, Emily
<p>Consultee Full Name</p>	Emily Watson Stubbs
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS794
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 20:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Please accept this email as a clear objection to the plans due to their unsound nature. I have lived in Upper Bucklebury for <redacted> years and find the blatant disregard for community and the natural e results in my support of WBC to be no longer evident. I moved to the area for the natural environment, the protection of the AONB area, and the wonderful green spaces tha disregard of our local biodiversity, this development cannot begin to consider that their suggestions can return the wide of so many local wildlife, and this will cause irreparable damage to our prized local environment. Another of my concerns is the lack of consideration for healthcare, whilst the plan proposes a new GP surgery, there viability of this, and with the shortage of GPs in current practices there is little prospect that a new surgery would op populations to the already over stretched service available in the area. This is also the case with Dentists in the area this within the plans.

	<p>The increased traffic through our small villages as people seek quicker and alternative routes to an already congested to our local village, and the general public, especially our young children who walk through the village to school, end traffic volumes and pollution.</p> <p>This new development would effectively mean that Bucklebury school students (who live in the village) are going to be (if oversubscribed, which would be the case with this increase in houses) as the new development would be closer, students are going to need to find considerable monies to pay for transport to Downs school, and miss out on continuing that have been through primary school with just because we live in Upper Bucklebury and are therefore further away development.</p> <p>I object wholeheartedly to this planned development and stand with my community as we fight to retain our green spa infrastructure and support for our community as a whole.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Claffey, Tristan
Consultee Full Name	Tristan Claffey
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS802
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	02/03/2023 19:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I wish to object to the proposed build of 1,500 to 2,500 houses on North East Thatcham. This is because the components would have a negative impact on me for the following reasons:-</p> <ul style="list-style-type: none"> • Healthcare provision - there does not appear to have been a Health Impact Assessment and there does not appear to be provision of an additional GP practice. It is currently very difficult to get a GP appointment without additional parking. • Traffic congestion - we notice that there are frequent traffic jams on Floral Way most mornings at rush hour. As more houses are built, one can only assume absolute gridlock at peak times. • Sports Field Provision - there has been no evidence provided for the funding or for a suitable location.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Walton, Kathy
Consultee Full Name	Kathy Walton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS946
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>In addition, the process around this Regulation 19 Objection is extremely complex and overwhelming for myself, a resident and I know that it will reduce the number of objections you will actually receive. I do know that a number of my friends are unlikely to be submitting an objection due to this user-unfriendly process.</p> <p>I object to the Proposed Plan:</p> <p>The plan hasn't been agreed according to Local Policy such as the Cross-Party Agreement. There is not enough information missing so we can't have a fully formed opinion.</p> <p>For me, my concern is the environment, pollution and traffic. The Proposed Plan does not take into account independent recommendation, including current Government Policy.</p> <p>Housing allocation was reduced to 1500 but there's no cap on this allocation and also there's no plan adjustment from 1500 to 2500.</p> <p>The Government state that Housing targets used by councils are no longer binding on them. Council's no longer have an advisory not mandatory. There's a wider need to look at what the community needs across West Berks rather than focus on Thatcham & Newbury.</p> <p>There hasn't been any ecological work. Where is the update-to-date Environmental Study to assess the impact on biodiversity requirement. The area is rich in wildlife such as insects, breeding birds, bats, badgers, newts etc. The woodland is of high quality and is being desecrated. The plan would destroy mature hedgerows, gullies and pond dynamics. WWF England say "<i>England is the most biodiverse in the UK and is suffering a chronic loss of wildlife...</i>" this should be a high priority to address.</p> <p>What evidence is there on the impact of building 1500-2500 houses on the plan?</p> <p>How can you build houses on greenfield land without understanding the impact?</p> <p>No defined gap between Thatcham and Upper Bucklebury. Strategic gaps between towns and villages such as the one between Thatcham and Upper Bucklebury has not been reaffirmed in Reg 19 thus allowing urban creep up Harts Hill.</p> <p>The Office of Nuclear Rep said "<i>No</i>" to this Plan because it is close by to the Nuclear Plant at Aldermaston that has restrictions on development.</p> <p>The Plan is right on the border of the Berkshire Downs AONB that contravenes regulations. The Plan puts the AONB at risk of damage.</p>

	<p>There's no feasible study for a country park, but why create one when we have this already that you want to destroy? and appearance of the area which is historic and a natural landscape.</p> <p>Light, noise and traffic will be extremely harmful to people and the ecology.</p> <p>Climate Change predicts more extreme weather including rain. Thatcham is in a valley, a natural flood plain so there surrounding higher farmland. Will the newly built Flood Alleviation Scheme on Floral Way be able to cope?</p> <p>"Brownfield first" should be preference over Greenfield however lots of brownfield sites have been excluded from the Lock Associates, an independent town planning, urban design and master planning consultancy based in Milton Keynes at a lot more and came to a different conclusion regarding new housing. Why is this being ignored? The Country-side enough brownfield sites in West Berks to build 21,000 homes!</p> <p>The demand on the current Water & Sewage infrastructure is already stretched, Excess flows into the River Kennet. not cope with the additional houses. What are the plans to upgraded ahead of any new builds and will this be included?</p> <p>There is a need for more agricultural land so it should be a priority to not destroy anymore.</p> <p>There is no up-to-date Traffic Study.</p> <p>There is a Colthrop proposed plan that includes the estimated £20-35m to build a bridge over Thatcham railway line. the HELAA technical analysis.</p> <p>Concern over Rat Runs while the works is being done. The proposed development will funnel traffic from the development displacement of A4 traffic onto wider rural routes such as Upper Bucklebury '. This would be where the roads are in have the potential for serious accidents.</p> <p>The Proposed Plan is rushed and hasn't been clearly thought through and there are better plans to consider.</p> <p>Please please take a realistic view on what is actually the best approach to building more homes that is inclusive to A their futures...</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	The plan hasn't been agreed according to Local Policy such as the Cross-Party Agreement. There is not enough information is missing so we can't have a fully formed opinion
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tompkins, Clare
Consultee Full Name	Clare Tompkins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS951
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 08:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposed Thatcham NE Development on the grounds that it is unsound and will have a negative impact on myself and the surrounding environment.</p> <p>Whilst I am fully aware of the the pressure on WBC in terms of the need to increase housing stock, the proposed development is not sound in a number of fundamental ways:</p> <p>1 Transport impact</p> <p>The development would create an intolerable increase in the level of traffic using roads that are already fully congested. The A4, particularly to the eastern side of Thatcham would inevitably become gridlocked further. This will impact profoundly on the village but also create increased pressure on alternative routes. The road through Upper Bucklebury already has in place major increased traffic volumes. The Development would force even more traffic onto this road which is self evidently not desirable for the impact all residents in the village. The impact of the additional traffic on Harts Hill Road would be catastrophic particularly in terms of development on that road. The inevitable bottlenecks created would mean access to and from Thatcham and Newbury would be seriously impacted.</p> <p>Furthermore, the development would place intolerable strain on the roads and parking nearby Thatcham Railway Station. The users of that station from the development would drive and park.</p> <p>Building the proposed development would cripple an already overstrained local transport infrastructure.</p> <p>1 Environmental impact</p> <p>It is undeniable that the development will clearly destroy a large green field site which in itself will have a tremendously negative impact on the area. Whilst it is acknowledged that the development will not directly be built in areas of specific protection etc. the very nature of the development to these areas (eg.natural woodland) would inevitably mean that these areas would be extremely adversely affected. Large numbers of people, particularly children, would gravitate to these protected areas and sadly, there are innumerable people who would destroy their beauty and underlying habitats. This should not, indeed cannot, be allowed to happen.</p> <p>Building a development of the scale proposed and at the site earmarked is criminal in ecological terms.</p> <p>1 Local infrastructure</p> <p>Key facilities in Thatcham and the surrounding areas are already at breaking point. In particular, existing schools, do not have the capacity and will simply not be able to cope with the large population increase. Trying to squeeze the proverbial quart into a pint pot will affect the whole population. In terms of Thatcham itself, the village simply cannot handle the additional number and a significant increase in anti-social behaviour and in particular outlying areas such as Upper Bucklebury which I strongly believe will become a victim of the development and anti-social behaviour.</p> <p>Quite simply, a development of this scale is unsustainable in its current location. Alternative solutions should be sought.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	O'Connell, Patrick
Consultee Full Name	Patrick O'Connell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS964
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would like to register my objection to the proposed development of 1500 to 2000 homes in NE Thatcham. My objection follows:</p> <p>Healthcare provision: existing services in Thatcham and local villages are already badly over stretched. A GP appointment notice and in recent years the service has deteriorated such that email and phone based consultancy has become the norm. I who needs a regular blood test I frequently run into issues where one part of the NHS tells me I need a test within days. Berks Community hospital is non-existent for weeks. I understand the plans propose a new 450 square foot primary care centre which is woefully inadequate for size of development in question</p> <p>Transport: I heard an argument has been made in favour of the development saying that the local roads have capacity to handle the development; I disagree; there are a number of points where we suffer major traffic build ups on a daily basis. There is already heavy traffic from Thatcham into Newbury. There are long tailbacks and delays each day from the level crossing at Thatcham station to the junction of Floral Way and the A4 to name but 3. Whenever there is the slightest disruption to traffic, be it roadworks or a traffic accident the system fails. The A4 around Thatcham is notorious as a traffic problem hotspot. To add the traffic generated by 1,500 new homes and construction traffic involved in the development phase will, based on the current plans, create carnage on a daily basis and impact retail businesses in and around Thatcham as people avoid the area where possible.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Firth, Jo
Consultee Full Name	Jo Firth
Consultee Organisation	

Agent Full Name	
Agent Organisation	
Comment ID	PS1016
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer

I am objecting to the above plan because it is unsound on numerous grounds.

1 Transport

1.1 Increase in traffic to Upper Bucklebury

The planned exit on the northern end of the site onto Hart's Hill Road will lead traffic from the extra 4,000 residents and then on to the Ridge going east through the village and west, past our house towards Cold Ash. The Ridge, which is a narrow road, is run for motorists in a hurry. It is already hazardous working to maintain the soakaway and hedges at the front of the road. The extra proposed traffic will unthinkably increase the hazard to life and limb. This end of the village has no pavements and the potholes not only pose an unacceptable degree of risk to me and my husband walking into the village to shop or post letters, but also to our neighbours, the schoolchildren walking home past our house, and the disabled child in a wheelchair and his parents.

This aspect of the plan is unsound.

1.2 Access and junctions

Why is there no drawing for the new priority junction on Hart's Hill Road? Without this how can any of us know whether the plan will have a right to know the thinking behind your otherwise empty assurances.

This aspect of the plan may well be unsound.

1.3 Car Park

Drawings show a new car park, on Harts Hill Road. Why is this needed? HHR is a narrow road with steep banks, limited visibility and to this will be dangerous, and who will police it to prevent the dumping, littering and other antisocial behaviour experienced on the common?

This aspect of the plan is unsound.

1.4 Safe and Sustainable Transport

WBC's assessments (SEA) says the plan will reduce accidents and improve safety. Based on my previous observations, more traffic to an already heavily trafficked village will do exactly the opposite.

WBC also maintains that the plan will have a significant positive impact on walking, cycling and public transport. Not only will it be buying a bicycle to compete with rat run drivers on the Ridge with another 4,000 people's cars on the local roads, but I spend every Sunday taking local circular walks from home, averaging 10 to 15 miles: this is our primary source of exercise. If this is allowed to go forward most of these walks will be eradicated by building over them, and the extra traffic emissions will be a disaster. No one enjoys road walking: we moved to this house in this area largely because of nature. We meet many local people on these walks with children and dogs, who will also bitterly feel this loss. So how can the plan be said to have a positive effect on walking?

This aspect of the plan is unsound.

1 Healthcare

Reading the comments of other local people I have grave doubts that the provision of extra services such as health centres will be through. Who will service all these new people? Our local surgery at Chapel Row is already fully stretched. For example, we have to go to Newbury rather than a local dentist. Where will new facilities go? Where will the funding come from? Staff are already stretched and there is a shortage of doctors and nurses. Who will run them and where will the extra workers come from?

This aspect of the plan is unsound.

1 Environment

Far from having a positive effect on the environment, the plan, if implemented, will do exactly the opposite.

3.1 Local people are concerned about damage to the Bucklebury Plateau Biodiversity Opportunity Area, the common and the heaths. 'Lowland heaths' are highly endangered environments and the UK has the greatest proportion of those that are left. We are cherishing these environments and their unique biodiversity.

3.2 This is an Area of Outstanding Natural Beauty: a major reason we moved here over 20 years ago. Siting a major development will permanently damage the countryside and spoil its enjoyment by those who live here. It will change the whole quality of the area.

3.3 The plan would negatively affect legal protected wildlife, not to mention wildlife in general, on site and in the large surrounding area. Mitigating its loss has been worked out. Having volunteered for the local wildlife trust for over 10 years, subscribing to its 8 day courses on related subjects, I am extremely sceptical of promises of mitigation of this loss. How exactly are you going to mitigate the destruction of so much prime habitat? Vague references to some sort of park are not a plan for mitigation. Not one iota of the plan is for improvement of the environment.

It is well known that carbon sequestration by the land depends on its biodiversity and the integrity of the complex wetland. To house some 4000 people here not only destroys natural assets in the area built upon but also fragments the large area. Fragmentation leads to loss of biodiversity (both non-protected and protected species). It also releases carbon previously stored in the ground. This can be quantified. Carbon release into the atmosphere is bad for both nature and people. How exactly is this going to be mitigated?

Vague promises of two 'community parks' or even the originally promised 'country parks' do not remotely constitute a plan for mitigation. Complex ecosystems provide benefits that some grassland and some newly planted trees do not. Where are the details of the plan going to fund their creation and maintenance? I believe concrete plans would expose the futility of the exercise as merely sticking plaster to a gaping wound.

Where is the Sustainability Charter to show how net gains of biodiversity and environmental sustainability will be realised? It is a requirement, so where is it?

The plan negatively affects local people's enjoyment of nature and the wellbeing that comes from it. Many more people will be able to enjoy nature. We personally as regular local walkers (5-18 miles each Sunday) will lose roughly half of our usual walks, and the air quality will be used. Extra traffic reduces air quality both on these walks and also in our home.

Does anyone really expect us to believe that building this number of houses in an area of natural beauty will both provide a better quality of life for their new owners as well as improved access to nature for those already living in the area? This is pure wishful thinking. The wider common and environs will damage nature, not conserve it.

WBC's assertions that the countryside will be improved by this plan are just that: assertions. So far, these assertions are empty.

For all these reasons, the parts of the plan dedicated to improving the environment are totally, utterly unsound.

1 Education

4.1 Where is the evidence for the number of new students to be accommodated in the area? Where are they to be housed?

4.2 Where is any new school to be situated?

4.3 Will it be a 6FE school?

4.4 What about the timing of the funding?

	<p>4.5 Where will the playing grounds for the new schools be found?</p> <p>4.6 Will the amount of the funding be at all adequate to meet WBC's educational obligations?</p> <p>Lack of full details in the LPR renders this aspect of the plan unsound.</p> <p>1 Other</p> <p>5.1 Timing</p> <p>On 6 December, Michael Gove (SOS for Housing and Communities) released a Written Material Statement that should not now be mandatory but advisory. It said the Planning Inspectorate should no longer override sensible decision-making that is sensitive to local concerns and that reflects local constraints and concerns.</p> <p>I understand from a communication from Bucklebury Says No that the timing of the NPPF consultation means that the housing requirement will be advisory only, and that the character of the area should be an important factor in deciding whether to be accommodated. They say that several local authorities have paused their housing plan process awaiting the outcome of a lower housing requirement might apply.</p> <p>I wholly agree that WBC should take the opportunity, as have other councils, to pause the planning process until the year comes in later in the year, so that any housing development will reflect the character of our village and of the outstar countryside in which it stands.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>I wholly agree that WBC should take the opportunity, as have other councils, to pause the planning process until the year comes in later in the year, so that any housing development will reflect the character of our village and of the outstar countryside in which it stands.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Morgan, Gary
<p>Consultee Full Name</p>	Gary Morgan
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1024
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:39:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am extremely concerned with the lack of proper research that has gone into the Thatcham NE development , the p created by this housing scheme will 'disperse' onto surrounding roads, not the main A4.</p> <p>When was a survey last carried out on the volume of traffic using Harts Hill Road and on through the village of Upp Common? I have lived her for over 20 years and the volume of traffic has increased and also the size of the vehicles. on the A4 as the amount of traffic using this 'rat run' increases massively and your proposals will have a huge impact along this road.</p> <p>I did not see anywhere a decent ecological survey, which should have looked at the impact on the wildlife in the suggest countryside?</p> <p>I know from experience that West berks planning office don't listen, so I realise that this will be swept aside like my planning office to do its job, <address redacted> is 1.5 meters higher than it should have been , <address redacted> of tons of clay from his back garden all over the common.</p>

	If you allow this proposal to go ahead it will be another example of 'money talking' and ignoring the general public, v by your lack of consideration for people's well being.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wright, Sue
Consultee Full Name	Mrs Sue Wright
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS614
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 16:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to lodge my objection to the above proposal given the size of the development and its impact on the village surrounding area.</p> <p>Of particular concern is the impact this proposed development will have on the environment. The northern boundary AONB which includes areas of ancient woodland and common land that would be adversely affected by the increase in traffic. During the recent pandemic and lockdown, the village was subjected to significant evidence of trespassing and problems and I fear that this would increase if this development goes ahead. The spectacular views across The Kennet Valley will be lost forever by this development.</p> <p>A second, but equally important, problem will be that of the increase in traffic. The road through Upper Bucklebury and the villages are already subjected to motorists using them as a means of avoiding the A4 and accessing the A34 and M4. If this development is approved particularly the plan for an exit at the north of the site onto Harts Hill Road. Traffic leaving the site going to go in the direction of Upper Bucklebury where it will split between traffic going through Cold Ash and traffic going through Chapel Row. The roads through these villages are ill suited to additional traffic: they are rural, single carriageway roads with narrow footpaths, which would constitute a serious safety hazard given the anticipated increase in traffic. The impact of noise from the additional traffic will be significant.</p> <p>When Floral Way was constructed it was meant to constitute an important boundary between Thatcham and Upper Bucklebury. It is a break that strategic gap and result in the loss of the village's identity as a rural community. Bucklebury Vision set out a plan to protect the landscape and the visual quality of the area should be maintained. This proposed development seriously undermines this vision.</p> <p>What will future generations think of us if we desecrate this greenfield site with all the ramifications that it will have on the landscape? The system is meant to protect rural environments and the increasing awareness of the importance of such areas in the landscape is even more important that these valuable sites are not destroyed. Once under bricks and concrete they will be lost forever.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes</p>	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chandler, Lin
Consultee Full Name	Mrs Lin Chandler
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS652
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As a resident [personal information removed] Harts Hill Road, I believe there are many unsound issues in the proposed new homes in NE Thatcham and believe such a development would have a serious negative impact on myself and on the area. As shown on the map my home will be engulfed and Thatcham and Upper Bucklebury will be one urban soulless sprawl with no shops, dentists, schools, anything resembling a means to serve the community seem non-existent in these plans. I have to travel a long way for an appointment, and I have never been able to find a dentist nearby. Thatcham itself has no banks since NatWest and Lloyds Bank Pharmacy has closed, the car park for local shoppers is costly and small. We are only able to have recycling and rubbish collection. Building another 2500 homes can surely only be more challenging for the Council.</p> <p>The proposed development will have a hugely negative impact on what is currently a rare agricultural landscape in an area which is inappropriate in the current climate to diminish agricultural and farming land which has for decades been actively used for grazing sheep. The farmland the proposed development will destroy is home to much wildlife, deer, pheasants, fox, and birds, many of which are flying after many absent years. The woodland is a natural resource and in light of the advent of the Queens Canopy Project will be destroyed. These fields and woods give accessible footpaths to nature for residents and visitors to enjoy and they are also important for encouraging and supporting local farmers so they don't have to sell up to developers to survive, to increase the amount of land and diminish agricultural spaces.</p> <p>Harts Hill Road is a steep narrow road and the drive into my home means a sharp right turn on the hill, across on a road with a limited view around the bend. The speed limit has been adjusted over the years to encourage lower speeds, but there are still accidents on this dangerous corner with particularly drivers cutting through from the busy A4 and taking little notice of the speed limit. The hill road for pedestrians and walkers including children are often risking their lives walking in the road. Cyclists too are not all cyclists expert enough to make it up the hill, causing tailbacks of traffic, including heavy goods traffic. Harts Hill Road is a busy road and such a huge development and the extreme numbers would make this a more dangerous road, and the proposed development of 1500-2500 new properties would have a hugely negative impact on safety, access and pollution.</p> <p>The building of 1500-2500 new homes would take many years. The everyday lives of current residents would be severely disrupted by the upheaval and disruption caused by such proposed building works. Noise, pollution, inconvenient road closures, water supply issues would all have a negative impact on the environment and the daily lives of current residents.</p> <p>I write as a local resident, in objection to the proposed development, in what I believe is the majority view, and trust that the Council will make a decision to deny planning permission for such an unpopular development and which would have such a detrimental impact on the local area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brooke, Oli
Consultee Full Name	Oli Brooke
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS810
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to strongly object to the proposed extension of Thatcham.</p> <p>I feel there are large components of the plan which are completely unsound.</p> <p>I also feel the negative impact of this development would be huge. There is already a huge amount of congestion on t not to mention the pressure on other local facilities, examples being the hospitals in Reading and Basingstoke, and m problem worse.</p> <p>I feel it is very important to keep Upper Bucklebury and other villages surrounding Thatcham separated from the urba their rural character and protect the quality of life enjoyed by their residents.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wight, Martine
Consultee Full Name	Martine Wight
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS814
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object please to the LPR's plans to allow the building of 1250-2500 houses to the North East of Thattham. Thattham is already completely underserved compared to Newbury and other similar towns as regards</p> <ul style="list-style-type: none"> • Doctors surgeries • Pharmacies – a big problem at the moment • Supermarkets • Shops – clothing, shoes, furniture • Parking • Post Offices – both counters and sorting office (the latter is terrible) • Road network <p>The traffic on the Relief Road has already massively increased over the 24 years that I have lived in North Thattham out of Dunston Park onto the Relief Road because of the volume of traffic.</p> <p>The problems at the level crossing have also massively increased.</p> <p>Thattham Post Office sorting office is already completely unfit for purpose and massively understaffed. Whenever we receive no post deliveries for a week. There are no covering staff at all.</p> <p>Thattham Bath Road Doctors Surgery already has trouble recruiting doctors and has tremendous delays in answering they have stopped inviting ladies to Well Women Clinics because of staff shortages. That is plainly storing up health local population.</p> <p>Also our dustbin emptying has already gone from weekly to two weekly while we have lived here.</p> <p>I moved to North Thattham in part because of its lovely semi-rural location. It would be a complete disaster to build its beautiful trees, flora and fauna. We have already had to endure months of works directly across the Relief Road on what was previously a beautiful field and view.</p> <p>The air quality has already diminished tremendously while we have lived here, due to traffic pollution. That is a particular such as my son.</p> <p>Please do think again on those plans. We just do not have the infrastructure or resources at all in North Thattham to</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darroch, Pamela
Consultee Full Name	Pamela Darroch
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS818
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 23:43:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

- * Yes
- * No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

I am writing to object to the planned development in northeast Thatcham as I find this unsound. As a long term resident of Thatcham, I am concerned about this development for a variety of reasons:

Healthcare

GP Surgeries in Thatcham are already oversubscribed and it can take 3 -4 weeks to get a routine appointment. The 150 new houses will put a huge strain on the GP surgeries yet there does not seem to be an evidenced plan on how these issues will be addressed.

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that it be referred to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, no details have been put into strategic healthcare planning.

NHS England rarely commissions new GP practices even where they consider there to be patient demand for improvement. Data from the 2016/17 survey of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an even worse situation in other parts of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or West Berkshire.

Five of the 10 lowest performing surgeries for percentages for same-day appointments came from this district. Both The Burdwood Surgery and Thatcham Health Centre are in this group.

Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients waiting for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents have access to a dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the local dental practices are considering the potential impact of increased workload resulting from additional housing.

Thatcham Town Regeneration

As you state in the plan, Thatcham town center and facilities badly need regeneration, only after that is complete, should the development proceed.

Transport

Traffic on the local roads is already overwhelming at peak times, with queues on Floral Way every morning, the A4 is congested and traffic will divert down country lanes which are unfit for the volume.

Since Covid, significantly fewer trains to/from Thatcham have been running. Given the lack of coordination around the railway, this will drive many more people onto the roads that are already struggling to cope.

Schools Provision Overview

The building of 1500 houses will obviously vastly increase the number of children in Thatcham yet the provision for education from through Infant to Secondary education is not clearly defined within the Local Plan Review (LPR). There is no coherent plan that breaches the Council's obligations to provide education facilities for children. Without this provision, the Plan for a large development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to predict the impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the area, not considered in the traffic plans and models in the LPR.

	<p>Unless the infrastructure (Schools, GP's, Shops etc) are built and functional in the first phase of the development the School for instance has a capacity of 1881 and an actual number of pupils of 1860, so they won't be in a position to</p> <p>Flooding</p> <p>Whilst there have clearly been extra measures built into the latest plans with the Wetlands Park, they have built over normally soak up the rain. I doubt very much the small wetland areas proposed would provide any safety net for those we can look forward to a repeat of the 2007 floods.</p> <p>It is hard to see how the Thatcham area can support a development of this size without a huge detrimental effect on I hope you take my concerns into account when considering this proposal.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	McGarvey, Janet
<p>Consultee Full Name</p>	Janet McGarvey
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS822
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS</p>	E-Mail

* Web * Unknown	
Response Date	02/03/2023 16:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I have considered all the information available concerning the proposed Thatcham NE development and believe that it is unsound. I object to the proposal on the following grounds.</p> <p>Pollution</p> <p>Apart from the ongoing pollution once the vast housing estate has been built, there will be massive pollution, particularly from the entire build, subjecting residents to major health issues already well documented.</p> <p>In addition, there will be massive noise pollution for years, and light pollution affecting the AONB next to the site, with impacts on animals such as owls and bats.</p> <p>Increased Traffic and Road Safety</p>

The proposal to put a priority junction on Harts Hill Road to release traffic from the site will vastly increase traffic on a country lane into the villages of Cold Ash, Upper Bucklebury, Chapel Row and Bradfield Southend, creating a 'rat run' road already has very poor visibility and without a footpath is already dangerous to those without transport who walk

Bearing in mind that households these days often have at least two cars the proposed 1500 -2500 new homes would increase the number of cars exiting the site onto the A4 and Harts Hill by a considerable amount. At peak times roads are already heavily congested and would struggle to cope with the proposed increase. As locals will know, if you need to get to the railway line at Thatcham to get to and from work the tail back of cars waiting for the barriers to open is often so long that you are down again before everyone has got across. Any increase in traffic would be a nightmare for everyone concerned.

Healthcare

Local GP surgeries and dentists are already overrun. The development plan makes mention of a (wholly inadequate) provision with the assumption that third party providers will open up shop there. But with GPs these days pooling resources to survive, there is no incentive to open a small satellite surgery. The outcome will be even more pressure on existing services, and anyone who has had an appointment these days will tell you that will become a nightmare. In addition, getting a dentist appointment in the area is a nightmare. The proposed development is going to do nothing to improve this.

Services

There seems to be an assumption that third parties will line up to fill in the gaps in your plans, in addition to healthcare providers. Thames Water will provide water and waste services, and various electricity companies will magic up enough to power the new homes and electric cars which will be encouraged by government policy over the next few years.

Thames water have only recently increased the pumping capacity to supply Bucklebury and the surrounding villages. They have had issues with water supply. Building a vast number of houses up the hill will surely put immense pressure on the system.

In addition to the objections above, the housing market is facing a perfect storm of events conspiring to cause a slump in new houses a risky business. The increase in lending rates and uncertainty about the future are driving this. One builder has to build only 8,000 houses nationally this year, compared to almost 15,000 last year. This trend is likely to result in a glut of houses en masse, with developers staging their work over a number of years, consigning us all to incessant disruption for years to come.

This proposal would have a very negative impact on everyone living in the wider vicinity, the Area of Outstanding Natural Beauty. It will take so much joy to so many, the wildlife that inhabits the area and the reason we all live here. There are large expanses of land to use them.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Southgate, Alanna
Consultee Full Name	Alanna Southgate
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS826
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I strongly object to the new housing development plans for the below reasons: <ul style="list-style-type: none"> • Significant damage to the Common • Pressure on medical & complementary services including GP surgeries and schools. Kennet is already over so more pressure. • Thatcham and Upper Bucklebury will effectively merge and Upper Bucklebury will lose its identity. This would be a fantastic community and a beautiful and peaceful place to grow up in nature. This would change and ruin this so • Increased traffic through Upper Bucklebury. <p>The negatives hugely outweigh the pros in this case, and I hope the council reconsiders.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Troeller, Vanessa
Consultee Full Name	Mrs Vanessa Troeller
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1032

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to object to the scale of this oversized development plan on environmental grounds. I walk daily in Blacklands Copse with its marked improvement in biodiversity, since the recent woodland regeneration at Bucklebury across the Common, where I regularly encounter a variety of wildlife, including deer (Roe and Muntjac), but this would be severely impacted by inevitable increase in traffic and as a consequence, air pollution. Obviously, this pollution would impact on the village population and could cause severe health problems.

	I, particularly find the lack of infrastructure planning and vague proposals (country parks) in these key areas very un
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Quirk, Lesley
Consultee Full Name	Mrs Lesley Quirk
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1044
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 18:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>As a resident of <Address Redacted> I would like to share my objections to the Thatcham North East Development need for increased housing in West Berkshire and government targets, the chosen site for such a large project appears components of the plan are unsound. I am strongly against the proposals and believe that they should be reconsidered.</p> <p>Thatcham already has a high flood risk, with alleviation systems being created. This risk would predictably increase systems in the proposed site area and the movement of ground, alongside the residential streets. The natural landscape ANOB around the proposed site, would definitely be negatively affected by the project. Reduction of green space shows wellbeing, physical opportunities and natural ecosystems.</p> <p>Noise, light and air pollution would increase. Traffic congestion through Thatcham on the A4 and on the route to the particularly at peak times, and especially when there are difficulties on the M4. It is difficult to see how this could be need this increased volume of traffic, more roundabouts, widened carriageways and daily disruption. There would be of life of present Thatcham residents.</p> <p>Demands for services such as dentists, GPs and pharmacies would be unprecedented. The present situation is already budgets is increasing. Any proposed influx in residents would raise concerns regarding the proposal of only one sector.</p> <p>It has previously been agreed that the land between Floral Way and Bucklebury provides a natural gap, creating a connection. The elevation of the land suggests the possibility of three residential areas that would loom over the rest of Thatcham than part of a connected town. The sheer size of the proposal would undermine the present town. Thatcham already has use and needs a different focus to improve its infrastructure, such as developing the high street and sports facilities. housing here? What other possible sites are there in West Berkshire that would not create the same negative impact?</p> <p>As already stated, I am strongly opposed to the proposals and hope that you listen carefully to the voice of the residents surrounding villages. I urge you to rethink and stop these plans.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	What other possible sites are there in West Berkshire that would not create the same negative impact?
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ford, Janine
Consultee Full Name	Janine Ford
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1048
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>I have read the representations made by Bucklebury Parish Council and agree with their objections to the Regulation 19 version of the LPR.</p> <p>There are clearly significant flaws in Regulation 19 version of the LPR. West Berkshire District Council (WBC) should not submit this document for examination.</p> <p>I have referred to some, but not all, of these flaws below:</p> <p>Timing of Consultation</p> <p>The Housing Delivery Test results published in January 2022 show that West Berkshire Council (WBC) provided 117% of the housing need in the preceding three years. Closer examination shows a more significant oversupply in the last year. This could mean that developments such as North East Thattham are unnecessary.</p> <p>The LPR is based on outdated ONS projections and a flawed methodology for deriving the appropriate housing target for a plan-led system where the amount of housing which must be planned for within any local plan is likely to be significantly higher than the figure in the LPR.</p> <p>Other local authorities have chosen to pause further progress on local plans until recent changes to planning policy are fully understood. This is at odds with WBC's approach.</p> <p>The LPR is not ready for examination, which contravenes Section 20 b) of the Planning and Compulsory Purchase Act 2004.</p> <p>Site Selection Process</p> <p>There is little evidence of a rigorous process being undertaken in the Site Selection Methodology Paper. Thattham T was not adequately consulted.</p> <p>The LPR contains very limited information regarding AWE Aldermaston and AWE Burghfield. There is a lack of consultation with AWE Aldermaston and AWE Burghfield and they were not adequately consulted and considered the impact of AWE Aldermaston and AWE Burghfield in the preparation of the LPR.</p> <p>The Site Selection Background Paper (Reg18 SSBP) refers to Site THA9 and raises concerns that this development would fill a strategic gap between Thattham and Newbury. The same concerns are not expressed in relation to Site THA20 (2,500 dwellings) development. This makes no sense. The analysis is inconsistent. The strategic gap is of fundamental importance between the village (i.e. Thattham and Upper Bucklebury)</p> <p>The proposed development would destroy the separate identity of each settlement and jeopardise the remote nature of the settlements.</p>

The proposal is at odds with WBC's own objections to the Siege Cross plans in 2015/16 (500 houses) - 15/00296/OU. WBC's own expert in that case was categorical in the assessment of the damage that Siege Cross would cause to the local environment. This was repeated throughout WBC's vigorous opposition to the site. Siege Cross now forms part of the THA20 proposal, which is 10 times the size and much closer to the AONB. The potential damage would be significantly greater.

There are also flaws in the Thatcham Growth Study (TGS), particularly in relation to the in the site selection process.

Sustainability Appraisal

BPC has prepared an analysis against the Sustainability Appraisal (SA) objectives (Appendix 2 of it's representation). The conclusions are not based on any accurate or available evidence. An accurate or reasonable assessment leads to the conclusion that the site fails all SA objectives. WBC's approach to the assessment and scoring of the site against the SA objectives is severely flawed.

North East Thatcham Strategic Allocation

Master planning is yet to take place and there is no vision for how the homes will be accommodated on the site, especially as its access is compromised by the pipeline.

There is no detail on the infrastructure or other facilities. The infrastructure has not been costed adequately and therefore the site is deliverable.

The school provision has not been costed within the viability appraisal and therefore the deliverability of this element is uncertain.

There are no details or costings provided for the proposed 1,200 sq m community indoor facility

It is unclear how the proposed outdoor formal and informal sports pitches will be provided when most of the site is occupied by the pipeline.

Given the gradient and level change across the site, it is not considered that a comprehensive network of cycle paths can be delivered.

Links and access to the AONB are being encouraged without consideration of the sensitivity of the common and wild areas.

The evidence base for trip rates and trip distribution is highly flawed and mitigation measures will not be successful.

The highway network in the vicinity of North East Thatcham is already over capacity and development of this scale would breach the threshold set out in paragraph 111 of the NPPF.

It is highly unlikely that the dwellings will be brought forward as net zero carbon and no allowance has been made for the additional energy required for the site.

It is unclear how any development on this site would deliver a 'net gain' for Thatcham Town in terms of drainage and flood risk within the viability report for the site.

Given the highly sensitive location of the site it is illogical that a Landscape and Visual Impact Assessment has not been undertaken for the proposed allocation.

Consideration of heritage impact should have been undertaken as part of the site selection process and subsequently. It is not considered appropriate that this is left to later stages of the planning application process.

Given the significant ambiguity over the position of the impact of the oil pipeline it is unclear whether the site would be developable as set out in the glossary of the NPPF. Given that WBC are acutely aware of these constraints it is illogical that no assessment has been undertaken.

Landscape and Character Impact

There is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is evidence to suggest that it will have a significantly negative impact.

The North Wessex Downs AONB statement on development in the setting of the AONB states that

'examples of adverse impacts on the setting of the North Wessex Downs AONB include: development which would harm the views in or out of the AONB breaking the skyline, particularly when this is associated with developments that have a visual impact (chimneys, plumes or blades for example) loss of tranquillity through the introduction or increase of lighting, noise, or other environmental impact like dust, vibration, spatial associations and historic relationships introduction of abrupt change in land use, loss of biodiversity, particularly of habitats or species of importance to the AONB loss of features of historic and natural landscape which are contiguous with the AONB; change of use of land such that to cause harm to landscape character development which would give rise to significantly increased traffic flows to and from the AONB, resulting in loss of tranquillity and erosion of the character of the AONB. Increase in air and water pollution'

The development of North East Thatcham would give rise to all of these adverse impacts to some degree or another.

The Landscape Character Assessment is now more than 20 years old so can be considered as up-to-date in accordance with the NPPF.

The Thatcham Strategic Growth Study (TSGS) offers little assessment of the damage the proposed THA20 site would cause to the AONB, acknowledging that the AONB partnership has objected to it, and that there is "little intervisibility between the two if any proposals." This does not adequately assess the effect the development would have on the AONB.

WBC is aware of the negative impact on the AONB. The Site Selection Background Paper December 2020 Table 8.2 shows that in developing THA20 WBC is accepting that the separate identity of Bucklebury would be lost and there would be defining the site as a viable site.

The proposal would have a direct and irretrievable negative impact on the AONB. WBC are charged to protect the AONB and the positioning of THA20 as a viable site.

The AONB board has objected to the concept of a country park in close proximity to the AONB, as it will encourage development (which has the potential to cause further harm to the wider areas).

Ecology and Biodiversity Impact

The proposed site is in the setting of the AONB and, as such, the development of the land would not protect nor enhance the biodiversity of the AONB.

The development of this site would have a significant impact on the character and beauty of Thatcham and Bucklebury.

There is no evidence that the impact of the development on biodiversity or the provision of net gains for biodiversity has been assessed. Instead, this is being left to the application stage. This is considered too late and runs contrary to the approach set out in the NPPF.

There is no evidence of the impact of the site insofar as it may contribute to, put at unacceptable risk or adversely affect the environment through air, water or noise pollution or land instability. This appears to contravene the NPPF approach, which says that development should help to improve local environmental conditions such as air and water quality, taking into account relevant information and plans.

WBC has not embedded biodiversity as part of its plan and has instead chosen to leave this to the application stage. WBC has not planned for biodiversity and geodiversity in line with the Planning Practice Guidance, specifically paragraph 8-010-20190721, Revision date: 21 07 2019.

It is a key part of the Bucklebury vision for the Common not to increase the number of visitors, but to place the emphasis on a chance to restore itself and thrive, both in terms of the diversity and abundance of its fragile ecosystem. Based on the LPR, the proposed development represents an additional 4000+ people being actively encouraged into the AONB, via the habitats found in Bucklebury Common, with its ancient woodlands and heaths, pastures, greens and historic ponds. The plan aims to balance accessibility and leisure usage with the needs of the environment, with increased usage from cyclists and ground-nesting birds, notably woodcock, and other wildlife.

The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is part of a Biodiversity Opportunity Area.

The data being used to establish the presence of species is out of date. In 2020, Bucklebury Parish sought environmental impact assessment for SP17:

- 80% of surveys were conducted more than 15 years ago
- 50% were more than 20 years old
- 44% were over 30 years old

BPC has appointed ecologists to conduct an independent study of the impacted area. The findings from a single day survey indicated that the site had a much higher biodiversity value than previously appreciated, including the presence of several bird species and one threatened migratory species, several bat species and abundant badger setts. The hedges, old trees and corridors linking up different habitats within and beyond the site boundaries. These initial findings imply that a full study of the site and measures and BNG will be far more complex for the development than was anticipated by the planners. This one study provides more information about the site than has been presented in the whole of the LPR and its available evidence base. The area has a much higher biodiversity value than assessed by WBC.

Protected species are present across the site and would be impacted. No detail on mitigation measures has been provided. Network features are under threat from the development and will severely impact distribution of key species.

Highway Impact

YES Engineering Group Limited was appointed by Bucklebury Parish Council to review the transport related evidence. The review indicates there would be delays and congestion occurring around key junctions along the A4 corridor, with through traffic on the routes.

Journey time analysis was carried out and assessed the most desirable routes for those travelling east (towards Reading). It was demonstrated that the quickest route in each direction is via Harts Hill Road or via Cold Ash Lane rather than the A4. The impact on these routes has not been assessed and this is a fundamental flaw within the modelling assessment.

The selection of North East Thatcham for significant development is fundamentally wrong as traffic will need to divert onto non-highway based mitigation measures are almost impossible to achieve due to its location/topography.

Development at North East Thatcham is likely to cause displacement onto wider routes away from the A4, through local roads in Bucklebury. The WBC Phase 1 Transport Assessment describes these routes as undesirable and, critically, the impact of any of the evidence presented in support of the emerging local plan. Additionally, there are fundamental flaws within the assessment.

In summary:

- The trip rates set out by WBC are unreliable and not robust.
- The trip distribution is unrealistic (all evidence suggests traffic will be diverted from the A4).
- The proposed mitigation measures suggested by WBC are improbable at best.
- The location of site means car traffic will dominate the area.
- The Highway network in the vicinity of THA20 is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic. Increase in traffic to Bucklebury will pose highway safety issues.

Heritage Impact

WBC does not appear to have taken into account the setting or significance of Colthrop Manor as a designated heritage asset in East Thatcham or considered the impact of the development or the way in which the capacity of the site would be affected.

Infrastructure and Services

There are significant failings with the LPR on whether the provision of infrastructure associated with the development under policy SP17 is viable or deliverable.

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to refer to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is no detail or insight into strategic healthcare planning.

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for them. Figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an ever-increasing demand in areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or the surrounding area in the future. There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site for one or more practices could relocate. All three existing practices are already overstretched.

Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients having to travel afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents have access to a dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have consulted any local dental practices regarding the potential impact of increased workload resulting from additional housing.

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR.

There is no coherent end-to-end plan, which appears to breach the obligations of WBC to provide education facilities for its residents.

The lack of effective or justified education provision across the various proposed developments also means it is impossible to predict the impact on traffic.

The location of a secondary school in the North East Thatcham development under policy SP17 would inevitably result in increased traffic across the whole Thatcham area and this has not been adequately considered in the traffic plans and modelling in the LPR.

	<p>There are no details in the LPR of the provision for Nursery or Early Years education. SP17 merely states that the site</p> <p>The provision for primary school education is unclear and contradictory. There is no data or evidence on the planned requirements. The LPR proposes that the sum of £12 million will be sourced from the developers of SP17 to fund the</p> <p>However, with no recent data available (the only data referenced is from 2011), it is impossible to assess if this funding will ensure the delivery of the required education provision.</p> <p>The plan for secondary school provision is unsound for the following reasons:</p> <ul style="list-style-type: none"> • There is no satisfactory evidence of the number of pupils the school is to cater for • The location of a school within the proposed development is not clear • The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable. • The timing and responsibility for the funding is not clear and has not been adequately costed in the viability appraisal. • There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education. <p>Climate Change and Flood Risk</p> <p>The Sustainability Appraisal is ambiguous in relation to flood risk. It states that the development at North East Thatcham will have a positive impact but there is also a '?' place in the assessment box.</p> <p>The justification for the assessment given by WBC states that the policy requires consideration of SuDS that could reduce flood risk, but there is no other reference made to flood risk. The policy does include requirements for GI, ecology and sustainability which may all have a positive impact on flood risk.</p> <p>It is not considered that this is a credible assessment, and the question mark demonstrates that WBC are unsure of the assessment. It is not considered that the LPR is justified, effective or consistent with national policy and is unsound on this basis alone.</p> <p>Water Supply and Foul Drainage</p> <p>Flood risk is a significant threat to Thatcham, and lack of evidence to suggest this has been adequately considered.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Consultation and Duty to Co-operate</p> <p>WBC announced the Regulation 19 consultation on 20th January 2023. Interested parties were then notified that the website would be unavailable on 21st and 22nd January due to planned maintenance of the website. It was unclear when the review of the LPR evidence could not begin until 23rd January 2023. This effectively shortened the consultation period to the required 6-week period.</p> <p>WBC did not properly consult Bucklebury Parish Council (BPC) in the first instance when carrying out the Settlements Review and their representations.</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Cant, Rebecca
<p>Consultee Full Name</p>	Rebecca Cant
<p>Consultee Organisation</p>	

Agent Full Name	
Agent Organisation	
Comment ID	PS1052
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>I would like to raise the following objections for the Thatcham NE Development,</p> <p>The traffic will be increased in an area that is already struggling to cope with traffic volumes. The proposed exit on to up through Upper Bucklebury village as the A4 is already extremely busy.</p> <p>No Health Impact Assessment has been published on the proposed NE Thatcham Development. There is no evidence that 1500 to 2500 new houses will be dealt with by the already local struggling NHS.</p> <p>There has been no evidence to suggest a serious attempt to evaluate the consequences on Bucklebury common AOC. Approximately 4000 people on the development site, the common and its legally protected wildlife must be considered. Concerns are coming regarding the proposed two country parks. It seems these have already been downgraded to community parks.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Billings, Laura
Consultee Full Name	Laura Billings
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1056
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	03/03/2023 15:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to object to the planning application for 1500 - 2500 in NE Thatcham.</p> <p>My objections are based on the facts that components of this Plan that are completely unsound.</p> <p>1) Traffic will be greatly increased through the villages and completely unable to be handled by the exit roads. Access inadequate on already dangerous and busy roads.2) Education provision for all years is not clearly defined in the L coherent end to end plan to achieve education provision for this large new housing development and the Plan is untenable</p> <p>3) The document gives no detail or insight into strategic healthcare planning for the new development. WBC and the relevant HIA or provided evidence of having appropriately liaised with local health care agencies or providers. There is no evidence to provide medical and dental facilities for the proposed 1500- 2500 new houses.</p> <p>4) With regard to the environment there is no evidence to support claims that SP17 will have a positive impact on the environment. I believe it will have a significantly negative impact. The policy looks to build as many houses as possible in small areas. No attempt has been made to investigate and address the consequences.</p> <p>I therefore strongly object to the proposed development on the grounds that is unsound.</p>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Shearn, Jeremy
<p>Consultee Full Name</p>	Jeremy Shearn
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1060
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	03/03/2023 13:23:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the NE Thatcham development on the basis that the plan is unsound in the following areas:</p> <ol style="list-style-type: none"> 1. Transport: There will be increased traffic both in Thatcham and in Upper Bucklebury where I live. I think this has been a major issue. The plan for an exit site on Harts Hill will increase traffic congestion. This impacts me negatively as I now drive my council school bus has been cancelled. I regularly pass pedestrians on Harts Hill and the junction where there is already a safety concerns on this road. There are no modelling results for this junction. Why is this? The council assessment is based on walking, cycling and public transport use but our bus route in Upper Bucklebury has been cut and this proposal will increase concerns so I would be even less likely to use this road walking or cycling. In addition, crossing the Thatcham level crossing will damage plants, threaten ground nesting birds such as nightjars and fragmented habitats of reptiles such as adders regularly and it is beautiful countryside that will be destroyed forever. 2. There is no detail of healthcare provision for those living in the new houses. The local surgeries in the area are already at capacity and me negatively as further pressure will mean appointments at Chapel Row surgery will be even less available. 3. It will have a significant negative impact from an environmental point of view. Damaging heathland and woodland and a major greenfield development in the broader area of the North Wessex Downs ANOB and it will have a detrimental impact on the environment. The original country park has now been downgraded to a community park and there is no evidence that it will have a positive impact as claimed and no significant analyses of the consequences to the environment of the plan. The heath is a fragile environment will damage plants, threaten ground nesting birds such as nightjars and fragmented habitats of reptiles such as adders regularly and it is beautiful countryside that will be destroyed forever. 4. There is no coherent plan for school provision. My children currently attend Kennet school which is full! Where are the new houses going to go to school? Or will the proposed secondary school be built before the houses. Unlikely given a local school is established. To this end I cannot see how the impact on traffic can be assessed accurately. Traffic around Kennet school on the school day is already very congested. Another school will significantly add to traffic at these times. The number of children at an additional secondary school may not be feasible but where else would these children go? I predict one of the consequences of the plan in Upper Bucklebury will no longer be in catchment for Kennet school which is just down the road but they will have to travel a long route and have friends living far away. This plan would have a negative impact with additional traffic on school runs, more congestion and less connection with Thatcham if children in our village can only go to The Downs. <p>Several Local Authorities have put their plan making on hold given changes so that planning inspectorate will no longer approve decisions so why are West Berkshire not taking this approach given the strong objections to such a large development on health provision, school provision, traffic numbers and environmental impact?</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hultmark, Carol
Consultee Full Name	Carol Hultmark
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1062
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the WBC proposal to build a development of many houses around NE Thatcham as I find it u</p> <p>I live in Upper Bucklebury on the main road >exact location of property redacted/personal details>.</p> <p>Apart from being horrified at the idea of so many houses being built on an area of unspoilt peace and beauty, absolu</p> <p>have found components of the plan which are unsound and the effect of this development will have a severely negat</p> <p>The most obviously negative effect on Upper Bucklebury will be the increased flow of traffic that will inevitably occur. already very busy and has become much busier since the development of houses at the bottom of Harts Hill.</p> <p>The increased volume of traffic from the proposed exit at the north of the site onto Harts Hill, is very a serious conce</p> <p>inadequate for a huge volume of traffic and, as it is already, dangerous for walking and cycling, so with an increase in</p> <p>new development even although the site may possibly have 'safe travel' within itself , the roads funnelling in and out</p> <p>pollution both in respects of light and air. There is also a proposed car park on Harts Hill-car park for what and why?</p> <p>traffic pressure on the road.</p> <p>I would like to understand where 'safe and sustainable transport' fits into the design of this development.-'to increase</p> <p>public transport' How?</p> <p>Healthcare:</p> <p>The Northeast Thatcham development plan SP17 proposes a 450 m² primary healthcare facility with a suggestion th</p> <p>Buckinghamshire Oxfordshire Berkshire West integrated care board other such appropriate body. This document is a</p> <p>strategic health care planning. However neither WBC nor the developers, as public and private stakeholders respect</p> <p>published a prospective HIA (health impact assessment) to the proposed Northeast touch of development. All propo</p> <p>is obviously likely to have a significant health impact in relation to its size and location should be accompanied by a</p> <p>with the current guidance for public-health England. The HIA should include reference to how the proposals for devel</p> <p>health service providers regarding impacts on primary healthcare services. Development proposal should demonstra</p> <p>have been considered in the design of the scheme because an unacceptable impact of health and well-being of exis</p> <p>permitted.</p>

A multi – agency approach is required for tackling health and well-being. The Berkshire West Health and Wellbeing s has been developed by the Reading West Berkshire and Wokingham Health and Wellbeing boards together with the partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order requirements associated with a new development. It is a great concern that there appears to have been no direct en Thatcham development consortium and local general practices.

There are 3 over stretched GP surgeries which at present cover the area of the proposed NE Thatcham developmen each other their combined lists include about 27,800 patients which really means just under 2000 patients per GP. C moving into a housing developments tend to make a greater demand on GP services. This is because there are mor maternity care. Pharmacy closes in Thatcham have put further pressure on healthcare practices.

There has been no approach by WBC all the developers to any local GP practice to discuss an appropriate site, floo or more practice could relocate in the event of the housing development being built. An enlarged primary healthcare s located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham devel of the population. This would be likely to be supported by Thatcham town council but has not been suggested in the options. Local practices did not have an input with inadequate 450 m² floor side proposal which they only discovered 2022, appendix D.

In respect of Health Care-Proposals for a major development that is likely to have a significant health being impact i should be accompanied by a fit for purpose health impact assessment in accordance with the current guidance from should include reference to how the proposals for development have been discussed with health service providers n healthcare services. The development proposal should demonstrate how the conclusions of the HIA having been co scheme because an unacceptable impact on the wealth health and well-being of existing new communities will not t neither WBC nor the developers as public and private stakeholders respectively appear to have arranged or publishe the proposed north-eastern development.

The three GP practices -which would cover the North East Thatcham development site already overstretched. These practice, West of Harts Hill Road, Burdwood Surgery east of Harts Hill Road and Chapel Row surgery.

Thatcham doctor's Surgery are run independently of each other in the combined list includes around 27,800 patients GP. Newly registered patient moving to make a greater demand on GP services, therefore how will this development WBC and the developers have not made provision to mitigate the new burden of 1,500 or more houses-They have n provision of a viable primary care medical facility.

Dental Practices:

There is no evidence provided that either West Berkshire council or the developers have approached any local denta impact of increased workload resulting from additional housing. As it is now Thatcham dental practice are unable to population with a with some patients needing to travel further afield for NHS and private dental care.

Schools provision.

Provision for education for nursery earlier through infant secondary education is not clearly defined within the local plan end to end plan: this therefore breaches the councils obligations to provide education facilities for children. Without th housing development is to untenable.

The lack of a coherent plan on schools provision across the various proposed developments also means that it is impo impact on traffic. The sighting of a secondary school to the north-east of touching would result in significant increase in area, not considered in the traffic plans and models in the LPR.

Policy SP1 7NE Thatcham strategic site allocation states that the site will provide early years provision – what are th

I cannot see any clear vision for proper funding or School Place provision -schools need to be available before houses incomplete and contradictory on the provision of secondary school in and around Thatcham. The latest LPR is in cor documentation. It proposes that the sum of 15 million be contributed by the developers to secondary education. The the land to be provided and hence no possibility of assessing at suitability.

It is clear that the plan for secondary school provision is unsound:

There is no such a satisfactory evidence of the number of pupils the school is to cater for, the location of school is no is not defined but it is noted to anything less than 6FE school is unsustainable, the timing of the funding is not clear proposed funding is sufficient to meet the Council's obligations to provide education.

Environment

The green spaces surrounding Thatcham and the local villages, Upper Bucklebury, Midham , Cold Ash, harbour a bi ever if built over by thousands of houses. This area is home to hares, buzzards, kites, Stone Chats, Nightingales, Th bush crickets, slow worms, Meadow grasshoppers, Woodlarks, Dark bush crickets. Adders, all manner of protected faun not annihilation. The Nightjars fly to Bucklebury every June from Africa and mate undisturbed on the commons in Bu that with a huge development of houses which create both noise and light pollution, not to mention the footfall on th thousands? Are we to lose this precious bird because other less sensitive sites won't be found?

The LPR's Sustainability Appraisal accepts that SP17 will, by building on a greenfield site inevitably have a negative imp but there is no detail on any mitigation for this impact. There are plans for community parks-but whatever these are, biodiversity, with the additional 1000s in footfall, noise, litter, light pollution, dog walkers, cats ...the negative impact i

To Conclude:

	<p>Siting a major greenfield development in this area of biodiverse treasure will cause irredeemable damage to the environment. The biodiversity will be lost forever.</p> <p>Are you really willing to destroy this fantastically beautiful piece of nature-depriving future generations of their right to enjoy it?</p> <p>The poet John Clare was writing in the early 19th century, when 4 million brown hares lived in Britain. Today, there are only a few left. 'dance, play a loiter still'- but only just. Like all British mammals, the Brown hare has been hit hard by habitat loss. I leave you with a poem which I hope will make you hesitate in the plans of destroying the habitat by passing the plans for the NE Development.</p> <p>Hares at Play</p> <p>The birds are gone to bed, the cows are still, And sheep lie panting on each old mole-hill; And underneath the willow a-resting, lies the fallow plough.</p> <p>The timid hares throw daylight fears away On the lane's road to dust and dance and play, Then dabble in the grain bushes, and fall from the barley's beard; Then out they sturt again and round the hill Like happy thoughts dance, squat and loiter.</p> <p>John Clare</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hoffman, Charles
Consultee Full Name	Charles Hoffman
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS934
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:52:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am objecting to the plan as it is materially unsound, unsound to the point I cannot quite believe there is even a con why this is so materially unsound are as follows: Transport Our house on the Avenue is on the border of this project in an area of Outstanding Natural Beauty, teeming with wild swamped by traffic which will upset the delicate ecosystem. The planners have carefully omitted the fact that there is a plan for an exit at the north site onto Harts Hill which is th was only made apparent as late as 6th Jan when the Transport Assessment was published. The traffic is going towa spread into Chapel Row and beyond. The infrastructure cannot take this. The wildlife cannot take this. There will be n is a dereliction of duty to the countryside.

The Transport Assessment talks about new priority junctions, but modelling suggests there won't be problems, and yet results at all for Harts Hill! Unsound.

Where on earth are all the cars being parked, again a car park is being shown on Harts Hill, this is close to the coming new influx of walkers and people.

The roads will become busier, cycling, running, riding will all become more dangerous.

Healthcare and Infrastructure

Again whoever came up with the location of Thatcham was mad. There is no detailed healthcare planning in the document. If a new GP practice, there has been no approach by WBC or the developers to any local GP practice to understand their needs they have. Thatcham, Burdwood and Chapel Row are all full. What on earth do these planners think they are going to do with the proposed development.

Dental practices are also overrun, I know that trying to find a hygienist for a practice is almost impossible speaking to the council at Stage 2 and 3 of the report on this project, scant detail is given more than a 2020 acknowledgement that GP facilities are too light on detail and ill thought this piece of the planning has been shown. This is very dangerous for any new residential services are near breaking already.

Environment

I alluded to the fact we live in an AOB. I cannot believe that the Council wants to slap 1,500 houses on agricultural land at danger to both the Bucklebury Plateau Biodiversity Opportunity Area including its woodlands and wildlife. Some vague proposals sounds both suburban and ill thought.

It is farcical to validate any claim that this planning will have a positive impact on the environment. Quite the contrary it is about to destroy one of the ancient areas of biodiversity and fauna west of Reading. You would be slowly asphaltting the countryside and joining Newbury, polluting the countryside from Junction 10 all the way to 13 of the M4.

The WBC states in the LPR that a Sustainability Charter is required. Legally required biodiversity net gains are needed to be submitted or been made publicly available. This is unsound and flimsy as the rest of this shallow planning piece.

Where on earth are another 4,000 people going to seek green space and recreation? A vague country park? Where are they going to go into the AOB, Bucklebury, Chapel Row, Yattendon. The areas will be wrecked. In the SP17 the developers couldn't even provide a country park, and they were demoted to community park which sounds like a merry go round, some swings and a slide for the developers.

The LPR's own Sustainability Appraisal has some very sad news, and revelation, even it concedes that SP17 will have a negative impact on sustainability. Why on earth are you building on a greenfield site? Shameful. Unsound. Please stop this.

Education

The lack of thought and capacity mirrors the healthcare concerns. No coherent plan has been put forward, no details of school education is contradictory in terms of planned numbers, secondary schools are already oversubscribed, the new schools suggested however cannot be filled, as government guidelines are that such schools with less than a 6FE are not sustainable. There is no funding earmarked for school facilities sports ground etc.

Conclusion

WBC should pause the plan making. They should wait for updated planning guidance that is coming later this year. It is not to progress for the time being. Frankly most people find this development more to do with greedy developers and land speculation than thought of consequence to the local communities and this beautiful land.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newill, Andrea
Consultee Full Name	Andrea Newill
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1013
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to object for the following reasons:</p> <ul style="list-style-type: none"> • Traffic – increased traffic through Upper Bucklebury and other villages; WBC propose a new roundabout on Harts Hill of the northern end of the development, and a car park, also on Harts Hill; additional congestion on the A4 • Pressure on secondary schools – Kennet is already over-subscribed; accommodation for additional secondary schools specifically stated • Consequential damage to the Common – increased footfall; increasing damage to an ecosystem of national importance • Environment – Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive environmental gain • Pressure on medical & complementary services – additional GP surgeries are not part of NHS strategy for the region • A 'Country park' – this has a specific accepted definition which is not met in this Plan. The three small, isolated settlements have no meaningful environmental value or commitment to exclude subsequent development • Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively merge and lose its identity • Number of houses now “at least 1,500” – From an initial site assessment of 2,500 of which 1,250 were to be built, the number has in fact increased to 1,500 houses because the Plan extends to 2039 rather than 2036 (as originally proposed)
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Southgate, Finola
Consultee Full Name	Finola Southgate
Consultee Organisation	

Agent Full Name	
Agent Organisation	
Comment ID	PS863
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 07:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>I have grown up in Upper Bucklebury and am deeply saddened to hear of the possible change in not just a landscape but a way of life. The impact of this will be incredibly wide-felt, not just on the community but on the entire surrounding area.</p> <p>Squeezing resources doesn't work. Increasing pressure on Kennet where I went to school will impact its ability to provide a standard that enriches young peoples lives. Beyond this, GP surgeries, supplies and primary schools which are all being further pushed. You will responsible for making the decision that leads to a decrease in the quality of health, education and the environment. The common is special. Historically and naturally. You risk damaging a place of national importance and personal memories. You're affecting the future generations and living ones. In the years that follow, think about who benefits from this? I don't. I appreciate the difficulties that lie ahead but equally the need for maintaining green space more now than ever as we live in an environment this plan poses.</p> <p>I can only ask that you reconsider to think of others around you and the importance of community in an ever-increasingly isolated world. Don't forget you supported this decision that will profoundly impact the lives of those in Upper Bucklebury and beyond.</p> <p>The plan is unsound and should be discounted.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dobbins, Lucy
Consultee Full Name	Lucy Dobbins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS871
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS	E-Mail

* Web * Unknown	
Response Date	01/03/2023 21:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing to object to the LPR Regulation 19, in particular NE Thatcham development, as it is unsound and unrealistic. I don't see how this plan will not have a massive detrimental effect on the environment as well as safety and education. As a student of [personal information redacted] School, I don't understand how there will be enough school places for all the children as Kennet already has loads of pupils. Additionally, as a new driver, it is a scary thought for me that there will be such a large increase in traffic. Particularly on Harts Hill which is already a very dangerous road. I don't see any evidence in the plan of measures to reduce an increase in traffic, and therefore find it unsound. There will be a massive impact on our local environment with habitats being destroyed and more people causing more pollution. The proposed 'parks' will be in any way as biodiverse and green as the current ancient woodlands and heaths and your promise that it will be. Not only is this terrible for the environment, but will also have a negative effect on mental and physical health and clearly not thought through.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ames, Sarah
Consultee Full Name	Sarah Ames
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS876
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 07:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I object to the proposal to build up to 2,500 homes on the greenfield area now known as the proposed Thatcham NV</p> <p>Transport</p> <p>Thatcham's infrastructure in the area will not be able to cope (the A4, Floral Way, Level Crossing), and public transport unlikely to impact on the usage of cars in what is largely a rural area where cars enable one to get from A to B easily.</p> <p>The site of the proposed exit on Harts Hill is not clear from the plans and there is no modelling on the use of this exit.</p> <p>Much of the using the Harts Hill exit will travel through Upper Bucklebury towards Cold Ash via Burdens Heath. In both directions (with no pavements in some areas) and going past Primary Schools (Bucklebury Primary and St Finian's) which is likely to result in the lack of provision for parent parking at drop off at St Finian's resulting in the need to overtake with little site of view.</p> <p>The increased traffic will also inevitably negatively impact Area of Outstanding Natural Beauty and footfall on Bucklebury.</p> <p>The Plan does nothing to explain how the infrastructure will cope, advise how safety in the areas stated will be addressed in the villages which is adjoins.</p> <p>Environment</p> <p>The development is on greenfield site which cannot be positive for the environment. rather than developed land and is home to a variety of wildlife and protected woodland. The development will result in additional traffic driving through the area which will be detrimental to the fragile ecosystems. I understand the focus of Bucklebury Common is focused on not increasing human pressure on the common, but with the homes so near the common which I am unable to see any way of mitigating.</p> <p>The proposed plan is unsound and needs further consideration and ultimately withdrawal. While I appreciate the need for housing the site is unsuitable. Smaller developments in multiple locations would seem more suitable to prevent transport and environment concentrated area.</p> <p>Healthcare</p> <p>The local healthcare facilities are already overstretched without further footfall from new residents. Given the financial constraints by GP practices nationally our area is highly unlikely to be allocated another site. I understand that the local practices are struggling with the impact on their services which confirms that there is no evidence to support sufficient resourcing and therefore no facilities for residents (existing or new).</p> <p>Please reconsider and withdraw the plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dalgarno, Louise
Consultee Full Name	Louise Dalgarno
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS897
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object strongly to the proposal to build 1500 - 2500 houses on the north east of Thatcham for the following</p> <ol style="list-style-type: none"> 1 The proposal will severely damage the environment of the delicate ecostructure of Bucklebury Common. It will have a negative effect on the site of the proposed development. Your reasoning of providing green spaces is unsound. The LPR accepts the development will have a negative impact on environmental sustainability. 1 The increase in traffic will cause safety issues for the residents of Upper Bucklebury and the surrounding lanes and the inevitable increase in population will produce. It will be particularly detrimental to the school and the School. 1 There are already sewage leakage issues into the Kennet and Avon canal. No thought or provision has been given for the extra sewage from the 2500 extra homes. 1 The existing educational establishments are already vastly oversubscribed. In order to provide continued education and development from outset, there needs to be a school built first. 1 Healthcare facilities again are already up to capacity. Where will the medical help come from if residents cannot access the prospect of a new surgery being taken on by an existing practice. Indeed there hasn't been any consultation on what sort of healthcare will be available. Existing residents already have a long wait to see a GP. 1 There are other brownfield sites which should be considered first for development before spoiling these beautiful green crops as is demonstrated by the current vegetable shortage. <p>How the Council who are meant to represent and work for the good of the district can contemplate a consultation of this nature is beyond belief.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Fisher, June
Consultee Full Name	June Fisher
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1070
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:56:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to this plan for 2,500 houses proposed for NE Thatcham.</p> <p>It is already hard to speak to a doctor in Thatcham, let alone make an appointment.</p> <p>It is impossible to book in with a NHS dentist, even private practices are full.</p> <p>We do not have a main emergency hospital close to Thatcham which already causes problems and therefore it is ridiculous to propose extra houses. Resources would be stretched even more with 2,500 new houses. This would have an impact on Reading hospitals and would also affect the number of ambulances and crew needed. This could cause people not being able to get to hospital could cause fatalities.</p> <p>The Air- ambulance facilities would also be stretched and could cause fatalities.</p> <p>The schools are bursting with waiting lists for people that live close by and want their children to go to the local schools.</p> <p>The roads are already extremely busy especially at rush hour & school drop-off and pick-up. More cars on the road will make it worse.</p> <p>There are already many small developments popping up and spoiling the look of Thatcham and this large development will bring in the extra cars in and out.</p> <p>This would have an adverse effect on wildlife.</p> <p>I feel that this development will affect everyone living in Thatcham and surrounding areas and it is ridiculous that this development in Thatcham will not be a nice to live and bring up a family and house prices will slump if local people move away which is not designed to be a big town!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Duff, Sean
Consultee Full Name	Sean Duff
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1079
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 14:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the planned NE Thattham Development.</p> <p>I believe the plan is not thought through with little or no mitigation to the impact it will have on the infrastructure of TH villages.</p> <p>The location of the site means that there is going to be a massive increase in car traffic with no improvements to the roads struggling with the current traffic volumes.</p> <p>The A4 through Thattham is already a bottleneck, Floral Way has queues in the mornings and the extra traffic through will increase safety issues. I don't see any assessment has been made of the routes most likely to be affected by the increased plan to improve the roads or mitigate the problems that will be caused.</p> <p>There does not seem to be any suitable plan to manage the increased school population with current schools already at their best unclear and unsatisfactory with no details for nursery and early years education for example.</p> <p>There doesn't seem to be any realistic plans to cope with the increased demand for Doctors and dentists.</p> <p>There is also the damage to environment with the increased risk of flooding, damage to ancient woodlands, reduction in green space in Thattham and Bucklebury and siting this development next to an AONB. There seems to be no plan for adequate open spaces forcing people to travel to other locations increasing traffic further and the subsequent damage to the AONB through increased traffic.</p> <p>I fully understand the need for more housing. I am of the opinion that allowing such a large development with little or no mitigation and improvements to infrastructure and environment is a matter of complete neglect to the people and environment of the area and goes against many aims of the council and the government's own policies.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Barnard, Margaret
Consultee Full Name	Mrs Margaret Barnard
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1084
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 11:56:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>WBC LPR Regulation 19 Objections</p> <p>Traffic:</p> <p>Putting in an exit at the north of the site into Hartshill is really crazy. It is already dangerous narrow road with several b could create an extra 3,000 cars. Hartshill could not cope with it. So dangerous for children going to school, cyclists and Not to mention the pollution from extra traffic.</p> <p>Car park:</p> <p>What is the point in a car park all available ground will be built on? There will be where to walk to?</p> <p>Healthcare:</p> <p>On average people wait 2 weeks for an appointment to see a G.P with surgeries full to capacity. We also have a sho Hospitals have no spare beds with patients having to wait in ambulances or corridors. How in the future, with so man people to be treated? Even 1500 houses that would create on average 6,000 patients. Young families moving in wou</p> <p>Education:</p> <p>In the plan schools are only vaguely mentioned. Have planners not considered the education for future generations? Pl need to be in place before houses are built.</p> <p>Children need green areas to play for mental & physical health.</p> <p>Infrastructure:</p> <p>A big concern is for utilities they have trouble to cope now every corner you turn on your journey road is either closed mains and roads flooded.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hartley Russell, Leo
Consultee Full Name	Leo Hartley Russell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1088
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to raise my objection to the proposed development in NE Thatcham outlined in the Local Plan Review.</p> <p>There are plenty of issues with the plans that I find do not fit in with the surrounding area and think it would have a s already live here as well as the environment.</p> <p>Some pertinent points I will list below but it is not limited to these by any means</p> <ol style="list-style-type: none"> 1. Increased road traffic 2. Damage to Bucklebury heathland 3. Overstretched GP practices 4. Overflowing schools
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Baggett, Peter
Consultee Full Name	Peter Baggett
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1041
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 15:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I've tried going to the consultation web page but it is horrendously designed and clearly intended to discourage ordinary people from participating. I remember the floods of 2007, trying to drive home after work with both the roads coming down from Cold Ash turn north of Thatcham would increase the likelihood of that being repeated. I walked up Lawrence's Lane a few days ago and the side of the lane was flooded and this after a dryer than normal February.</p> <p>Apart from this, there is also the question of services. Traffic on Floral Way is already a nightmare and the bus services are being cut from Thatcham. In the 26 years I've lived here, I've noticed that the bus services have been steadily reduced and mostly cut. This will pretty much add 5000 extra cars and the roads can't cope with the current level of traffic.</p> <p>Also it's pretty much impossible to get a doctor's appointment, again there aren't enough to cover what we have now. It is supposed to have been expanded over the last 10 years to match its current population which hasn't happened. This is what happens.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Grey, Peter</p>
<p>Consultee Full Name</p>	<p>Peter Grey</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1105</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 17</p>
<p>Chapter / Policy / Appendix Title</p>	<p>North East Thatcham Strategic Site Allocation</p>

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am the owner of <address redacted>, a farm that immediately abuts approximately 800 meters of the eastern boundary of the NE Development ('the Proposal').</p> <p>Inevitably, as a Midgham resident, my submission is Midgham-focussed, but I believe that many of my points are relevant to the Proposal, namely Thatcham, Bucklebury and Cold Ash.</p> <p>It is my proposition that the Proposal contains fundamental elements that are flawed, insufficient, and intrinsically unsound. WBC is under a statutory obligation to carry out adequate consultation with all concerned/relevant parties, on schemes of particular enormity and complexity of this Proposal.</p> <p>It is my assertion that WBC has not carried out meaningful and/or timely consultation with, amongst others, key parties to the Proposal, namely, Midgham Parish Council, the residents of Midgham, and the property owners immediately adjacent to the P</p>

been no public forums or debates organised by WBC to inform the above parties specifically of the nature, raison d'être of the Proposal.

For example, I, as one directly affected by this Proposal, have not been contacted at all by anyone publicising or justifying it. So, they would have elicited the significant fact that I own the land and the stream that lies on the eastern margin of the site. I have spent 29 years of time and expense in creating a wild life corridor in this area, close to the North Wessex Downs Area of Outstanding Natural Beauty, as well as further along the course of the stream and the adjacent land, also owned by me. Suffice it to say, I will be adversely prejudiced by this hard-won situation.

WBC's Proposal now calls for 1500 homes on a site initially proposed (in 2020) for 2500 homes, and is located NE of the site, on agricultural land, currently in agricultural production, situated immediately adjacent to the AONB. In the current Proposal, the reduction is reflected in a reduced development site size, so it is not improbable that the original proposal of a 2500 homes development would have followed its course.

The absence of any authoritative and detailed Environmental Impact Study to support this Proposal is astonishing; but the 'likely impacts on the environment' are appallingly vague, misleading and totally unsubstantiated. In fact, this Proposal will have a negative impact on the local environment and highly detrimental effects on the existing (and currently protected) wildlife. A population of approximately 4000 people, with all their attendant life support systems and facilities, will necessarily damage beyond repair the current well-established and abundant eco systems and bio-diversity.

There is no justification for this unplanned and delinquent devastation of the virgin countryside, when other more appropriate sites are available. WBC is ignoring other potentially very significant impacts that a development of this magnitude will have on the locale, all of which will affect Midgham.

For example, Traffic. 1500 homes, at the outset, will involve at least an additional 1500 vehicles (cars and vans) utilising the existing road systems which, at best, are barely coping with current traffic volumes and will, at worst, create further major traffic problems. The road that has deteriorated significantly since I have lived here (for 29 years), and is now used as a 'rat-run' from Bucklebury to the A4, has branches that have been hugely eroded, fences and hedges that have been badly damaged (releasing cattle, potentially onto the road), and tree branches knocked down by vehicles that should be prohibited from using what is, essentially, a farm track. So walkers and motorists are all much more substantially at risk NOW. What it will be like when any new development outlined in the Proposal is added to the volumes of traffic onto the Lane, via Bucklebury or the A4, is difficult to conjecture, other than that it will inevitably be even worse.

The WBC Phase 2 Transport Assessment Report July 2021 asserts that the policy is likely to have a 'Positive Impact on the Environment'. This is critical to the design of the site'. This is simply unsubstantiated and unachievable nonsense, as other privately commissioned reports have averred.

And, Education. Existing School facilities are already over-stretched and failing, and any exponential growth in pupil numbers from local housing development, will necessitate pupils being transported into neighbouring towns (assuming their facilities are not affected by traffic problems). The Proposal makes no reference to a detailed study of the impact that a population of the size envisaged will have on existing local education resources, nor does it offer concrete solutions to cope with the required growth in education.

The LPR, which accommodates the entirety of the Proposal, is inconsistent, incomplete and contradictory in its consistency with primary or secondary education provision.

And, Healthcare. I understand that WBC has not consulted with the existing local healthcare provision facilities, including other special Health service providers. These are already severely overstretched, evidenced by 3 to 5 week waiting times for specialist appointments available at all. The 450 sq m primary healthcare facility proposed, barely touches the surface of the demands of an increased population of 4000, and is a typical WBC unsubstantiated effort to legitimise an ill-considered answer to a serious issue.

Finally, I have to question WBC's continued vigorous promotion of this Proposal, in the face of salient criticism from the public. WBC proposition is certainly predicated on insufficient and unsubstantiated evidence. Whilst the core requirement for a development is it is essential to reflect that any such requirement must be accurately measured against scientific and professional requirements, of suitable site locations, of size of individual developments, of character and quality of construction methodology, of requirements, of likely impacts on the environment and vital eco-systems, and on actual need, as opposed to profit.

All of the current reaction to this Proposal points to a need to thoroughly revisit the core elements of the Proposal, including the massive New Town (the size of Hungerford), its location on virgin agricultural land, the absence of any authoritative support for Health provision, Policing, other Infrastructure such as drainage, telecoms, water, electricity and gas, impact on the local environment and the effect such a Proposal would have on the lives and well-being of existing local residents.

I strongly recommend a 'back to the drawing board' policy on this Proposal and, indeed of the whole LPR proposition. The current policy is clearly to build as many houses as possible in an area of virgin countryside, the proposition being supported by insufficient evidence, which itself ignores the pragmatic probability of the consequential damage to the environment, both human and natural. A proposition of this magnitude is so poorly researched and presented and which proffers the message that everything is possible, unsubstantiated policies aver that it will be.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

No

Please give reasons for your answer

WBC is under a statutory obligation to carry out adequate consultation with all concerned/relevant parties, on schemes of particular enormity and complexity of this Proposal.

It is my assertion that WBC has not carried out meaningful and/or timely consultation with, amongst others, Midgham Parish Council, the residents of Midgham, and the property owners immediately adjacent to the site. For example, there have been no public forums or debates organised by WBC to inform the above parties specifically of the nature, raison d'être and/or consequential impacts of the Proposal.

For example, I, as one directly affected by this Proposal, have not been contacted at all by anyone publicising or justifying it. So, they would have elicited the significant fact that I own the land and the stream that lies on the eastern margin of the site. I have spent 29 years of time and expense in creating a wild life corridor in this area, close to the North Wessex Downs Area of Outstanding Natural Beauty,

	as well as further along the course of the stream and the adjacent land, also owned by me. Suffice it to say, I will not to adversely prejudice this hard-won situation.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I am prepared to appear at a Public Enquiry, if invited.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gale, Simon
Consultee Full Name	Simon Gale
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS901
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the plans for 2500 houses in North East Thatcham</p> <p>The infrastructure is already creaking in Thatcham. Roads are in an awful state, Doctors appointments are hard to come by, the school is terribly overcrowded despite its Ofsted rating.</p> <p>To introduce 2500 homes with all the associated vehicle movements would be a disaster. There seems to be no appropriate railway which may mitigate some of the issue. It seems that the existing residents of Thatcham will suffer poor air quality if the proceeds.</p> <p>Flooding is also an issue. My home was flooded in 2007. Concreting over the northern run off would seem rash, where it is not in my house again.</p> <p>The area being considered is a beautiful buffer between the town of Thatcham and Upper Bucklebury. Is it worth ruining a beautiful area, concerns are forefront, it seems West Berks Council are willing to sacrifice forever, a beautiful area, for extra money payments</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>If housing targets are to be hit, perhaps it is worth looking at sites outside the already congested towns. How about sites close to good road connections</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Treen, David
Consultee Full Name	Mr David Treen
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS922
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to strongly object to these plans on the grounds that the plan is in my view unsound and will result in a massive impact on the surrounding area should these plans be passed.</p> <p>As a resident of Upper Bucklebury for 39 years I am appalled at what will become of the local area should the Thatcham development be implemented.</p> <p>This plan is ill thought out with the West Berks Council opting to take the easy option and dump several year's worth of development in the area without any regard for anything else than trying to satisfy government mandatory house building targets which are set to drop as of January 2023.</p> <p>No accurate up to date data is available such as traffic data, educational data etc.</p> <p>No consideration has been given to the local biodiversity and major questions exist over supplies of various utilities.</p> <p>The following will help to explain my objection :-</p> <p>Road & Transport</p> <p>A Safe and Sustainable Transport system must be a major priority in any development plan and I do not believe this is the case. Rather than reducing accidents and improving safety my opinion is that the plan will do the very opposite.</p> <p>I have not been able to find any recent traffic flow census data.</p> <p>I understand that a traffic census was taken for and supplied to WBC by the development company involved with the Thatcham development. However, this data will have been completely flawed as it was carried out during the Covid 19 lockdown period when traffic would have not presented a true accurate picture of traffic at that time if Covid was not present and travel not restricted.</p> <p>I also understand that WBC are not intending to carry out any new census and will use the flawed and out of date data currently available attempting to carry out their own census at their own cost.</p> <p>Unfortunately data is not yet available.</p> <p>Why such important data relevant to a major development has been left to a local parish council only leads me to conclude that accurate data to be used that may have a negative result on the development plan.</p> <p>Until accurate data can be produced then no one is in a position to forecast the impact of the proposed development on the local roads.</p> <p>The local roads around Thatcham and its closest villages are already very congested during the busy times of the day, particularly after the school day and the evening rush hour.</p> <p>As Thatcham has grown over the years, the road system that supports the area has not kept up with the increase in population and has resulted in traffic congestion on both the major route A4 Bath Road as well as minor roads supporting the villages such as Ash, Chapel Row, Midgham, Crookham and Woolhampton to name a few.</p> <p>The A4 Bath Road has become more congested as the local population has continually grown with many large developments in the Thatcham area and that will continue to grow with the many additional developments already in the WBC building programme.</p> <p>Traffic is using the small roads & lanes through the villages as "rat runs" more and more to avoid the congestion on the A4 Bath Road. This is very apparent with the volume of traffic now passing through Upper Bucklebury.</p> <p>The proposed development will only increase this traffic causing serious potential problems for the village populations such as Upper Bucklebury etc.</p> <p>It should also be noted that some of the roads through the villages are not in the best condition.</p> <p>Unless a huge amount of work is carried out to upgrade the road system there will never be a safe route to complete the traffic flows around the local area.</p> <p>Thatcham has a major traffic restriction that is caused by the railway crossing at Thatcham station.</p> <p>For years it has been well known and recognised that the level crossing causes huge traffic congestion and delays on the main London to West of England routes. I have personally seen the traffic queued north up Farnborough Road almost reaching the A4 Bath Road and south of the crossing towards up Crookham Hill towards Thomford Park Hospital.</p> <p>Often at busy times the queue isn't able to clear before the next train causes the crossing to close again.</p> <p>For the last 40 years or more there has been discussions on building a bridge to rectify this problem but nothing has been done. The Americans with Greenham Common and Kennet Heath development are a few examples.</p>

The addition of 2500 houses very close to Pipers Way will only add to major congestion in the area.

Looking at the NE development plan there is only one major road that borders development area which is the A4 Bath Road.

The other roads that surround the proposed development area are Harts Hill Road, Floral Way, Cox's Lane and Lawrences Lane. None of these roads are suitable to support any increase in traffic.

Also Floral Way and Bath Road are the only roads that have pavements and street lights.

As mentioned above A4 Bath Road is very busy during several periods of the day. 2500 houses adding its traffic to the existing traffic will add to the congestion. I suspect that this will result in more traffic opting to use alternative "rat runs" through the various lanes and roads.

Harts Hill Road is a very dangerous road with a history of road traffic accidents including fatal accidents. The road is very narrow and as water run off from the fields next to it.

Most of the accidents are not reported and never recorded as drivers recover their vehicles without help from the authorities. This is not a true record of accidents.

The road is a narrow road that has slowly been widened by erosion of the banks over the years from increased traffic, heavy goods vehicles (HGV's); or by design to accommodate larger vehicles.

This can be seen as additional drains have been installed to the nearside of the existing original drains to enable water to flow away as the original drains are now within the road.

Whenever a cycle uses Harts Hill Road, the traffic can only follow at the speed of the cycle due to the width of the road and the narrow road which restricts safe overtaking of the cycle. This is a big problem going north as the road is going up hill and traffic is heavy.

Harts Hill also lacks a pavement and street lights and pedestrians that walk this road are in serious danger.

Floral Way connects Harts Hill Road to the A4 as well as Lawrences Lane and Cold Ash Hill.

Although this is a good road it would only feed traffic to the next bottle neck.

Lawrences Lane is a single track road which now has restricted access and if improved would only provide a route to the village of Thatcham.

Cox's Lane is again a single track road from the A4 to Upper Bucklebury and Midgham and no more than a track.

All the roads mentioned would require major upgrades and improvements to support the development plan but would also impact on the adjoining villages which will then become bottlenecks to the traffic flow.

Educational Facilities

The current schools and other educational services are in the main totally full and for the development plan that has been proposed, more must be made available to support such a plan.

There is no clear evidence of sufficient proposed funding to meet the councils obligation to provide education.

The current plan appears to be suspect with the plan being based on old out of date data.

No information on funding for either the current Kennet School or a new Kennet School seems to be available.

The same can be said about details of a proposed new Kennet school such as location etc.

In fact no clear plan exists regarding local schools to support this development or to enhance existing schools to support the increase in pupil numbers .

The rumours are that a new replacement Kennet School could be built on the Development site and the existing Kennet School would be used to help fund this new build.

This should it happen will of course increase the pressure on whatever school provision are to be provided due to the increase in pupil numbers beyond the development plan as well as additional pupil numbers.

If a new replacement school was to be provided then this would result in most of the Kennet School pupils having to travel to the new school several times a day. Therefore a safe method of crossing the A4 would have to be provided.

Sports fields will have to be provided should a new school be built.

None of the development site is a flat site with the land rising towards the north and towards the east. The flattest land is the A4 which will be exposed to the most traffic pollution.

No funding appears to be made for the addition of sports fields.

Upper Bucklebury is currently in the catchment area for Kennet Secondary School as well as The Downs School in Compton.

Most local children attend the Kennet School due to its close location and ease of access.

If the development goes ahead then our local children will be excluded from Kennet and will have to travel to Compton. The children of the NE development will take priority as they will be closer to the Kennet School.

My understanding is that Kennet is at 100% capacity and that the Downs School is over subscribed. This will then leave our children having to travel even further distance outside its current catchment area.

Primary Schools will also be impacted as will Early Years provision.

I am not sure what if any plans have been made to address education support for these groups.

Utilities

Power

Can the current provider of electrical power (SSE?) be able to supply the additional requirements of the proposed development?

I ask this question as planning was submitted to WBC in 2017, Application Ref 1701012/FUL, to allow gas fuelled generation units to be located in Upper Bucklebury.

From memory these units were to be used as emergency power units should the National Grid be unable to maintain the supply.

This application was withdrawn during the planning phase but it does suggest that there was and maybe still is a question over the reliability of the local electrical supply.

Water & Sewage

Can Thames Water cope with the additional load for both clean water and sewage?
 With an estimation of somewhere around 4,000 people living within the development plan area a substantial increase in water disposal will be required.
 The residents of Upper Bucklebury suffered for years with unreliable water supply which was eventually resolved with the replacement of the bottom of Harts Hill Road and replacement water supply pipes.
 Will this development add additional load to this pumping station or will specific measures be applied to protect the pumping station at Chapel Row and area?
 Can the sewage treatment works on Lower Way Thatcham take the additional load from yet another large development?

Flood Prevention

Upper Bucklebury is approximately 134 meters above sea level and the A4 Bath road 70 meters.
 Will any flood prevention measures be required to protect the proposed development as well as the area to the south?
 The reason for this question is that during periods of heavy rain fall a tremendous amount of water runs down the lane. So much water that that areas of land towards the lower end actually heave upwards and form a sort of mushroom shape up to 30cms high. It is possible to stand on these mushrooms and jump up and down and it feels like jumping on a water balloon. These mushrooms eventually disappear after a day or two.
 The water will still be required to go somewhere but where if the land is covered in houses and hard surfaces.
 Storm drains could guide it away from houses but it will still need to be managed carefully to prevent a torrent cascading down the lane.

Medical Services

GP Surgeries

The current development plan appears to have little detail or plans for providing Medical Services other than a possible extension. From my experience I know just how difficult it is to get an appointment at my GP Surgery at Thatcham Medical Centre. This is why I use the GP Surgery at Chapel Row and the GP Surgery at Burdwood in Thatcham.
 Our local GP Surgeries are under tremendous pressure from both patient numbers and staff shortages. I know from experience just how difficult it is to recruit medical staff such as doctors, nurses etc., to this area.
 As Thatcham has continued to grow over the years the local surgeries have had to take measures and move patients to other areas. New patients that are moving in to their catchment area. With up to another 2500 houses additional Healthcare Facilities are needed.
 Any plan must meet the local demand as laid down by the Healthcare Agencies which doesn't appear to have happened.

Dental Practices

Dental Practices are in the same position as the GP Surgeries.
 Trying to register as a patient on either an NHS or Private Dental Practice is difficult due to the practices being at full capacity.
 The development plan seems to have ignored Dental Practices completely.

Environment

This proposed development is entirely on a Greenfield Site that is currently on agricultural land spread over 3 farms.
 Why is WBC trying to build on agricultural greenfield sites when other brownfield sites are available such as Colthrop Farm?
 Surely with all the pressure on using brownfield sites before building on greenfield sites it makes no sense not to use brownfield sites in Berkshire.

The proposed site is within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).
 This AONB is home to many rare and endangered species that are legally protected, and as such this area should be protected. Any development should not be carried out that will result directly in habitat destruction that is currently supporting these endangered species.
 The development plan does not have any strategy documents to support the protection of this landscape.
 The value of the area for wildlife and potential effects on biodiversity appear not to have been properly assessed with the development.
 With no adequate green spaces being provided within the development plan other than a vague proposal for two corridors it is clear that WBC has at best very little commitment to recreation requirements of the residents as well as protecting the biodiversity.
 Without any real plans for green spaces, parks or other recreational areas it can be expected that residents of the development will be unable to use areas such as Bucklebury Common for recreational purposes bringing additional traffic etc., as well as increased disturbance to the common areas.
 No funding provisions are mentioned in the plan for green spaces.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Webb, Marcus
Consultee Full Name	Marcus Webb
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS772
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 21:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I object to this proposed development. Here are my key concerns: 1. With this scale of development increased traffic pressure is inevitable. With the proposed exit on to Harts Hill a pro Burdens Heath to Cold Ash/Hermitage and the M4 and via Upper Bucklebury to Chapel Row. These roads are wholly in with encouraging the use of safe walking and cycling. 2. Harts Hill is a notoriously bad road with frequent accidents. Funnelling more traffic in this direction is dangerous. 3. I understand that more houses are needed. However, the scale of this development is wholly out of reasonable pr amenities to cope. It merely continues with further residential development in the Thatcham areas which lacks a viab encourages and enables green travel within local communities and a viable local economy. It appears that WBC are without insightful thought as to how to create viable and environmentally sustainable local communities. 4. Thatcham has been blighted by high volumes of HGVs from the Colthrope site which was a fundamental strategic of Thatcham residents for decades. NET development only intensifies the out of balance nature of such large develo 5. Please ban HGVs accessing major truck routes via Thatcham; they should be routed east to the M4. 6. I would like to challenge WBC statement that "The policy is likely to have a significant impact on walking, cycling a WBC arrive at this unsubstantiated conclusion? 7. I would like to challenge WBC on the detailed plan that will result in enhanced heath care facilities for a significant WBC assumptions are unsubstantiated and not evidence based and joined up with other healthcare agencies. 8. NHS dental provision in Thatcham is wholly inadequate today. WBC have not addressed how this issue will be address 9. The proposed NET development will cause harm to the Bucklebury Plateau Biodiversity Opportunity Area; how co this scale and impact. This is not acceptable. 10. This is a greenfield development within a landscape setting of the NWD AONB. The enjoyment and protection of development of this scale. I challenge WBC to provide evidence to support the claim that this development will have a p 11. WBC proposal of 'country parks' normally means glorified dog toilets. This is no real amenity at all; only of limited place to avoid for everyone else. 12. The provision for all educational ages is not thought through or substantiated. Over the past 3 years 14% of early the UK. WBC can not simply ignore the wider policy issues and provision of early years facilities and impact on local to work opportunities. 13. The children of Bucklebury should continue to have a choice of secondary school and not be shoehorned toward no sense.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kearins, Gill
Consultee Full Name	Gill Kearins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS793
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 20:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Being a local resident with a young family the impact of this development is huge. There is no clearly defined provision for educational institutions at all ages. There are no details of the provision for nursery or early years. As is the case with the current situation it is contradictory. The current situation is that the schools local to us are already oversubscribed and therefore this will be flat, which the only area for this is located next to the A4. This is not an appropriate area to have a play area for children. They will also be a substantial increase to the traffic which is going through upper Bucklebury, and it will be used as a car park already.</p> <p>Hartsville is already a very dangerous road with no pavement down to the town. The exit that I put to come onto this road is the cause of a serious accident as they are not being properly done with pavements installed.</p> <p>What is the purpose of the car park on the map?</p> <p>That also appears to have been no liaison with local health authorities as to how provisions for this massive increase in population will be met for. The plans that are currently in place will again mean GP surgeries and dentists which are already oversubscribed will be in place as an infrastructure in these plans. The impact on all residents that already live around this area is that of people moving into the area all those already resident and the provision of basic facilities has not been provided for.</p> <p>There is also no regard for the environment whatsoever with cramming over 4000 houses into a smaller space as proposed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Obin, Jenny
Consultee Full Name	Jenny Obin
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS797
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 21:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to formally register my objection to WBC LPR Regulation 19, the proposed development of 1500 to 2500 for the following reasons:</p> <ul style="list-style-type: none"> - It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury. - The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham. - It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and farmland. If large scale are approved there will not be any open rural areas left for future generations to enjoy. - The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain. - The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven and unrealistic. - According to the Transport Assessment paragraph 3.26, <i>'The access arrangements for the Northern end of the NET station on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause problems'</i>. I can't see how this so I am unsure as to why this has been stated. Please can you share these with me? How can increased speed on an already dangerous and busy road (without the development), be seen as not causing a problem? - There are drawings showing a new car park on Harts Hill. This again will increase traffic to an already very dangerous road and promote anti-social behaviour, illegal activities, fly tipping and littering which is regularly seen on Bucklebury common. - In terms of <i>'reducing accidents and improving safety'</i> your assessment has concluded that <i>'the policy is likely to have a significant positive impact on walking, cycling and public transport as safe travel will be critical to the design of the site'</i>. Also regarding <i>'increasing opportunities for walking, cycling and public transport'</i> your assessment concluded <i>'the policy is likely to have a significant positive impact on walking, cycling and public transport designed with these in mind'</i>. I wholeheartedly disagree with both of these assessments and I have concerns with the way they have been assessed. Please can you provide me with the evidence and conclusions for both these assessments? Also, it's not just about the development but the surrounding areas, villages and community which exist today and have done for years. What assessment has been done for these with the increased traffic? <p>Further to the above, this development will have a significant impact on traffic levels and the associated pollution through the area increasing:</p> <ul style="list-style-type: none"> - Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially as we have many people who walk along this road to the Primary School. - Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes. - Increased traffic through ALL the surrounding villages in general, especially as there is a plan for an exit at the North-East Thatcham Development. This will significantly increase traffic towards Upper Bucklebury, Chapel Row, Bradfield, Cold Ash and Hermitage. WBC has stated <i>'the exit will be of A4 traffic onto wider rural routes such as Upper Bucklebury'</i>. This is a total understatement and completely neglected. The roads especially as the roads are already inadequate, have no pavements and are extremely dangerous with speeding traffic. The number of accidents is already high and this proposed housing development and exit will mean this is inevitable. <p>This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services which are overstretched.</p> <p>Healthcare</p> <p>There is a significant lack of detail around strategic healthcare planning and the NE Thatcham development. As far as I am aware developers have arranged or published a prospective Health Impact Assessment for this development. There has also been no Health Impact Assessment for the North-East Thatcham Development Consortium and local general practises. Why hasn't this taken place? The current level of services available will result in the three existing practises in the area being overstretched even further. WBC and the development should be responsible for the provision of a viable primary care medical facility. To add to this Thatcham Dental Practises are already unable to meet the needs of the local population, this will also get worse with the proposed development.</p> <p>Environment</p>

There will be damage to the Bucklebury Plateau Biodiversity Opportunity Area and the historic woodlands, especially will also destroy the enjoyment of the local countryside by local communities in terms of the broader North Wessex Downs impact to legally protected wildlife. There is no evidence to support claims that the NE housing development will have a positive impact but instead it will have a significant and serious negative impact on the overall environment, protected wildlife, natural resources and biodiversity. Environmental sustainability is defined as: *'the ability to maintain an ecological balance in our planet's natural environment and its resources to support the wellbeing of current and future generations'*. I am honestly quite shocked and disappointed that the sustainability of our precious environment. In addition, as far as I am aware there is no significant attempt to investigate or mitigate any negative environmental consequences. Why not?

Education

within the Local Plan Review the provision for Nursery, Early Years, Infant and Secondary education and funding has not been clearly defined. The provision for Primary and Secondary school education is unclear and contradictory. WBC, as an education authority, has a legal obligation to provide for suitable school provision. How this obligation will be met across all school years has not been defined or evidenced. School needs to take priority and should be confirmed before any housing development is agreed. Unless this is done, no additional school provision will be provided, leading to oversubscribed schools and crowded, ineffective educational facilities. Talks of provision of school fields however no evidence for funding or a suitable location (a sports field near the busy road does not suffice as suitable) has been identified by the WBC or NE Thatcham Development Consortium.

Further items to highlight:

- The development will significantly increase the noise and light pollution to the Bucklebury residents. There are no measures in place to mitigate this.
- There is no evidence that this development will enhance Thatcham town centre (or the area in general).
- It is not likely to attract new businesses to the area or create or significantly increase employment.
- The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development is planned to be built on the site of the shop.

There is now particular focus within the Consultation National Planning Policy Framework on taking into account the character of the area and how much housing can be accommodated. As a result of this, several local authorities have paused their plan making process pending the outcome of the consultation on the basis that a *lower housing requirement could be applicable to the plans than the current requirement*. Although I am completely against the NE Thatcham housing development, I would ask that WBC should take the opportunity on the plan and present a revised plan in line with the updated planning guidance when this comes in later in 2023.

To conclude, this development is unnecessary, inappropriate, and ill-conceived and should be rejected.

Please do not take the opportunity to live and play in our beautiful countryside away from our families today and future generations. Let the Thatcham housing development go ahead.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brunwin, Veronica
Consultee Full Name	Veronica Brunwin
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS927
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 23:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Please find below my objections to the Local Plan Review as I find the plan and associated information presented to be focussed on the development of the area known as NE Thatcham, and relate to how the proposed development will affect Bucklebury. I am happy to speak at a public inquiry if invited.</p> <ol style="list-style-type: none"> 1. Development site and location <ol style="list-style-type: none"> a. The proposed NE Thatcham development concentrates the majority of planned housing across West Berkshire on the common interest of our region. It will do nothing to support viability of the many villages. b. The proposed site will create the biggest single housing development site ever in West Berkshire. The resulting estate is unsound as it does not stipulate how the necessary infrastructure for a new town the size of Hungerford will be provided. c. The proposed site is outside the settlement boundary of Thatcham on rural, high quality agricultural land. The site is unsound. d. The site represents creeping urbanisation, coming within one field width of the village of Upper Bucklebury (AONB) causing air pollution, light pollution and water pollution in the streams between the development and these two villages. Light pollution in Upper Bucklebury, which is a naturally dark place, with no street lights. e. Being situated on the side of a hill, this large development will be visible from a wide area of the Kennet valley. The development to screen it is unsound. f. The site is in the Outer zone for AWE. This is not mentioned in the updated plan, which is unsound. 2. Services and Infrastructure <ol style="list-style-type: none"> a. Water supply. The water supply for Upper Bucklebury and Chapel Row is pumped up Harts Hill Road. We regularly have had four complete losses of supply in the last two months due to leaks under Harts Hill Road and Common Road. Increased demand, and increased traffic volumes on Harts Hill Road will cause more disruption to water supply. b. Flooding. The land in question is a natural soakaway for the town of Thatcham. The Flooding report does not consider the impact from the development, and is therefore unsound. c. Air quality. The schools in Thatcham are near the A4 which is an Air Quality Monitoring zone. Increased traffic will increase A4, and increase particulate pollution. d. Healthcare. The council has not published a health impact assessment. There is already severe strain on dentist, GP and Thatcham and the Bucklebury villages. The local GP practices have not been approached. This is a major risk to exist if development goes ahead. e. Such a large development should include sports facilities for the new residents. These are not included in the plan. 3. Travel. <ol style="list-style-type: none"> a. The statement that the development will improve sustainable travel in the area is unsound. b. The statement that the development will have a positive impact on road safety is untrue for the reasons given below. c. The A4. This road is narrow in Thatcham and regularly becomes congested, particularly when traffic is diverted from the A4 to HGVs. When this happens many cars use Harts Hill Road/Common Road/The Avenue as a rat run diversion. This will get worse as it goes ahead. d. Many children have to cross the A4 to get to school. They are at risk of traffic accidents. This will increase if an additional road is added to the NE Thatcham development. e. Schools. The plan does not state how the new children will be educated from the age of 3 to 18. There is already a shortage of places in Thatcham. More children travelling to Theale and Newbury for schooling will increase traffic on the A4. f. The statements about active travel are unsound. With a housing estate built on a hill, residents are unlikely to choose to walk or cycle. g. Traffic volume study dates from 2015. Transport needs and preferences have changed a lot since then. h. The development is a long walk from Thatcham Station. Residents are most likely to use cars to get there. i. The level crossing. This is a bottleneck which is closed for up to 40 minutes in an hour. 2,500 more homes (probably 1,000) will make the bottleneck worse. j. Harts Hill Road. This is a narrow, winding lane on a steep hill. It is not suitable for walking and cycling, and local residents use it for this purpose. The traffic plan reveals that the new estate will have a back entrance onto Harts Hill Road, which will signpost onto this dangerous lane, causing even more accidents than currently. Through traffic from Harts Hill Road travelling NE towards Thatcham will increase traffic on the many small lanes, and through the villages as there is no two-lane route. k. Drawings show a car park on Harts Hill Road. This will create an additional hazard on this very dangerous, narrow road. l. The back entrance onto Harts Hill Road is likely to cause significant extra traffic on Common Road and The Avenue as well as due to traffic speeding across the common. There are regular accidents where vehicles hit wildlife such as deer, rabbits and badgers. m. Danger to cyclists. Cyclists regularly use both Common Road/The Avenue and the bridle paths across the proposed site to get down to Colthrop. These bridleways will be removed, leaving no safe cycle routes from Bucklebury to Thatcham. Cyclists are at risk of acar accidents. n. Danger to walkers. As quiet rural villages, Upper Bucklebury and Chapel Row have limited footpaths and no street lighting. The NE Thatcham development will increase the number of pedestrians hit by cars in our villages. o. There is no mention of improvements to local bus services for the new development. 4. Environment <ol style="list-style-type: none"> a. The proposed NE Thatcham site abuts the AONB, yet the plan does not include an environmental assessment of the site. This is unsound. b. The site will remove ancient hedgerows holding hundreds of years of biodiversity. This is contrary to the vague statement in the plan about biodiversity. c. The ancient woodland south of Upper Bucklebury will be fully encircled by the development site, removing a valuable asset and loss of biodiversity. d. The two 'country parks' included in the previous plan have been removed. There will be nowhere for the residents to go for a walk. e. Bucklebury Parish Council commissioned an Environmental Audit of the proposed site. This states that legally protected sites on the proposed site and will be harmed by the development.

	f. Light pollution will particularly harm the rare, ground nesting birds and Owls resident on Bucklebury Common. g. The Common volunteers are working hard to protect the rare heathland environment of Bucklebury Common. This the increased traffic and dogwalking caused by the spill-over of people visiting the Common.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Steer, Mike
Consultee Full Name	Mike Steer
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS931
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to this plan as a local resident who is impacted by the flawed nature of the plan and proposals</p> <p>First off, I live in the village of Upper Bucklebury. This plan directly and negatively impacts the traffic flow through the village particularly concerned for the safety of the children in the village who walk to and from Bucklenury Primary School and walk to the bus stops for their secondary school buses. Not only will increased traffic pose a significant safety threat, but the village is not viable to sustain the increased traffic directed this way through the exit at the north site on Harts Hill will be funnelled towards Upper Bucklebury. The road quality is already poor and increased traffic will not only further deteriorate the road but poses increased safety risk due to volume. This funnelling of traffic will put the village under significant burden and Alongside this the increased traffic will also bring an increase in pollution as a greater density of traffic will inevitably result in idling on Harts Hill and throughout the village. This too will have an impact on children and families walking to and from school transports during peak traffic times.</p> <p>The plan also details drawings of a new car park on Harts Hill which is unclear in its purpose. The logic behind this proposal will add more traffic to an already busy road and may also encourage anti-social behaviour at night-time which will put local police under unnecessary burden.</p> <p>Lastly on traffic impacts, the council has come back to the SEA and indicated 'the policy is likely to have a Positive impact on walking, cycling and public transport' and 'The policy is likely to have a significant impact on walking, cycling and public transport should be designed with these in mind.' There is no substance to these statements. They do not adequately demonstrate any actual effect. There is no clear evidence to support these statements and as such they must be considered null and at worst.</p> <p>Next; Healthcare. Concerningly, there is a lack of planning and care for this subject in the plan. There is no clear evidence that a HIA specific to the proposed NE Thatcham development has been arranged or published by WBC or the developers</p>

recorded direct engagement between the NE Thatcham Development Consortium and local general practices (local logistics around this.

The NHS Berkshire West Clinical Commissioning Group confirms there is a worse shortage of GPs in other parts of that there is no real prospect of a new GP practice being established in Thatcham or West Berkshire as a result of this priority vs other areas in the country with greater need and demand. Any indication in the plan therefore around esta misleading, unrealistic and purely lip-service. The true viability has not been fully considered.

There has also been limited provision to mitigate the impact of increased patients to both local GP surgeries (three in practices. The three GP surgeries (Thatcham Medical Practice, Chapel Row and Burdwood Surgery) are already over population. Adding 1500 new houses and patients into that is therefore unfeasible.

Next; the environment. There are a number of challenges with regards to the environment for this plan which indicate There is concern over the damage to the Bucklebury Plateau Biodiversity Opportunity Area and particularly the Common support the claims that SP17 will have a positive impact on the environment - there is reason to believe the impact will damage to the local biodiversity and the Common. A Sustainability Charter is required but there is no evidence that this publicly.

With the development proposal and an estimate of 4000 additional people concentrated on one site the detailed proposals are at risk of not being appropriate for the volume of people. There is no indication of management of parks or details look like. The initial proposed country parks have also now been downgraded to 'community parks.' The plan therefore green space and steps to protect biodiversity as well as lacking any mitigation of impact of footfall on nearby countryside.

The Sustainability Appraisal from the Local Plan Review accepts that SP17 will have a negative impact on environment greenfield site and therefore would result in a negative impact on environmental sustainability which would need to be detail around plans to mitigate this; only the need to do so. The same Appraisal then contradicts this by indication of sustainability through not taking into consideration the impacts on the environment (impact on biodiversity, impact on legally protected wildlife) and outweighing any impacts with a perceived social and economic benefit impact.

Finally; Education. This is an area particularly important to me as a resident as I have a young son and another baby Headteacher at a local primary school and know the impact on schools that new developments have. Within the Local Nursery, Early Years, Primary and Secondary education is not clearly outlined. There are no details for Nursery or Early information shared around Primary Education with no evidence or insight to support any view of planned numbers. I was a teacher and team leader for the Early Years and Key Stage One teams at Francis Baily Primary School. The school oversubscribed and situated in a building which was no longer fit for the size classes that it was being forced to take to put huge pressure on both Bucklebury Primary School and Francis Baily and I sincerely believe that the education be put at risk as a result of further developing housing as proposed.

For Secondary education, there are no details of the location of the land to be provided or suitability of this; just a suggestion to contribute to secondary education (without associated detailed timescales). There is not a number of Form Entries of the number of pupils the school would cater for. There is also no clear provision or funding for adequate Sports Facilities the only available land being adjacent to the A4 with all its traffic and fumes. The provision of Secondary schooling in the two catchment secondary schools are The Downs School or Kennet. Where the schools are oversubscribed, children prioritised. The NE Thatcham children would therefore be prioritised for Kennet, removing the choice in this scenario proposal is therefore detrimental to our children and the future children of Upper Bucklebury.

In conclusion, as a local resident and professional in the care of children in West Berkshire, I am extremely concerned of detail or clarity and believe this will have an adverse impact on myself and my family both now and in the future. I believe this plan to be lacking in robustness and feasibility.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Baker, Julia & Roger
Consultee Full Name	Julia & Roger Baker
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS935
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Having been a resident here for over 50 years I wish to strongly object to the Thatcham NE Development Regulation 1 it to be UNSOUND.</p> <p>1) The precious eco structure of Bucklebury Common will be severely damaged and the proposed development will have a negative effect with light pollution on the dark skies. The reasoning given to providing green spaces is unsound. The LPR acceptance of a negative impact on environmental sustainability in its own appraisal.</p> <p>2) Over the years the increase in traffic has caused speeding and safety issues for residents of Upper Bucklebury, and the problem even further.</p> <p>3) The infrastructure from the water board has been a problem for years causing our water to be cut off on many occasions.</p> <p>4) All the local schools are oversubscribed and therefore need to be built ready for continued education of our children.</p> <p>5) Doctors surgeries, Dentist and Hospitals are all struggling and have not been consulted how they will manage with the new residents. Will the new residents be able to register and receive the health care they need, there needs to be radical change to the current system.</p> <p>6) Other brownfield sites should be considered first, before spoiling our beautiful green Arable fields that we need to grow our own food. We need to need to import and rely on other countries and their problems thus causing us shortages.</p> <p>Lastly how the Council who are meant to represent and work for the good of the community can contemplate a consultation with developers is disgusting and mind boggling!!!!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rendall, Jacqui
Consultee Full Name	Jacqui Rendall
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS954
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to make my objections to the Thatcham NE Development.</p> <p>I believe there are areas of concern to which due care and diligence have not been applied.</p> <p>There is great concern for the inadequate infra structure of the whole area. It barely meets the needs for local residents and schools and medical practices without very convincing research and background ring alarm bells. You cannot sit a surgery & Dentists without having consulted the NHS already and bringing them on board with permission already given being displayed here and a bit of a gung ho attitude just to rail road these plans through.</p> <p>The roads cannot contain all the traffic that said houses will incur and the top of Harts Hill Road will be a major black spot.</p> <p>Why can't this large complex be broken down into smaller clusters and built across a wider area that is Brown Field?</p> <p>This all feels like a hastily drawn up and ill thought out plan at the behest of the developers and landowners. It would be inadequate.</p> <p>I sincerely hope you will reconsider these plans and the comments that you will have received from the general public.</p> <p>Please do not build on this Green Field Site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Barlow, Marc
Consultee Full Name	Mr Marc Barlow
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS962
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I live in Bucklebury and want to let you know how this development will affect local residents. Initially, I didn't think we had assumed the traffic would be directed towards the A4 or along the bypass towards Newbury. However, this is not the information provided it will have a significant affect on the lives of all residents in Bucklebury, Chapel Row, Midgham, and the natural environment.</p> <p>I am OBJECTING to the Thatcham NE Housing Development Plan for the following reasons;</p> <p>Greenfield Site</p> <p>My main objection is that this is a greenfield site. New research from the CPRE says in rural West Berkshire, there are 46,544 hectares of greenfield land, totalling 46.54 hectares, which it is claimed would allow building of 2,837 new homes without the need to build on any other land.</p> <p>When the housing numbers are no longer mandatory, and when there is already considerable potential for new homes in the area, it is clearly wrong for local councils in our county to be offering up vast swathes of countryside to developers, especially in areas of high landscape value such as AONB [Area of Outstanding Natural Beauty]," said Greg Wilkinson, chairman of CPRE Berkshire.</p> <p>The site of a former paper mill and farm in Colthrop has been proposed by developers as an alternative housing strategy. The overwhelming response from the public was very positive. A new road bridge over the railway and improved infrastructure would be a considerable improvement.</p> <p>The railway level crossing at Thatcham Station causes huge queues of traffic either side of the railway backing up towards the station. The increased traffic created by the development, the queues will just be longer, especially during the rush hour. This is a major source of pollution from exhausts and tyres.</p> <p>Traffic Increase</p> <p>As mentioned above one of the main objections is the increase in traffic movements as a result of the new development. Two access roads from the estate, one leading directly on to Harts Hill Road, will mean a huge amount of additional traffic on the roads of Bucklebury, Chapel Row and Bradfield to get to the main road giving access to A4 (Reading), M4 (east and west) and the A33 (west). As well as taking this direct route, traffic will use smaller lanes from this road down to the A4, travelling south towards the station through Cold Ash to travel north. The roads are narrow country lanes with many bends and no footpaths. The condition of the roads is at the least, with many potholes as water running/settling along the edge of the roads freezes and then causes the tarmac to crack. The villages are very quiet with little through traffic. The main route from Harts Hill Road consists of several acute bends. On this route, there are no pavements. Increased traffic will cause accidents with pedestrians, cyclists and horses. There are already accidents in this area and sadly, even with the current level of traffic several accidents involving cars and horses occur.</p> <p>Directing traffic along this road will only add to pressure on existing accident blackspots. Ie where Common Hill meets the A4 and the junction of Back Lane and dual carriageway of A4.</p> <p>There is no alternative to car travel. The regular but infrequent buses through the villages, having been totally stopped by the development, area, if you need to get somewhere you need a car. Very few people living in these areas use other alternatives to the car.</p> <p>GP Surgery</p> <p>Our local GP surgery in Chapel Row is already struggling to recruit and retain staff, combined with the increased population from the new houses. It is impossible to get an appointment unless you phone in the morning and if you are lucky enough to get a slot, you see a GP. If the surgery is forced to accept more patients it will negatively affect the existing patients and cause further delays. Injuries (Thatcham) and A&E.</p> <p>Bucklebury Common</p> <p>The plan mentions a 'Country Park' – this has a specific accepted definition which is not met in this Plan. The three proposed settlement boundary have no meaningful environmental value or commitment to exclude subsequent development. They do not provide adequate green space within the development itself and not rely on a link to the area of AONB to provide its green space.</p> <p>Bucklebury Common should be protected from increased footfall which will have an adverse effect upon the Common's diverse ecosystem that is nationally important. This consists of the famous Avenue of Oaks at Chapel Row, ancient woodlands and some of the largest areas of heathland in Berkshire.</p> <p>The Common has a rich variety of flora and fauna. Conservation of important habitats is undertaken by the Estate through its collaboration with various voluntary organisations. <i>The Bucklebury Heathland Group continues to work to restore the Common to once an extensive of heather and gorse, offering sanctuary to many birds and much wildlife.</i></p> <p>Already there are problems with anti-social behaviour such as groups of motorbike riders on the Common and 'dogger' dogs along the Common.</p>

	<p>The local environment will be changed forever in a negative way. This is Greenfield development abutting an AONB strategy for positive impact and overall biodiversity gain.</p> <p>I strongly urge you to reject this development and look at alternative sites that will not destroy this beautiful area for</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Jennings, Teresa
<p>Consultee Full Name</p>	Teresa Jennings
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS801
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	02/03/2023 22:28:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	

<p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to raise my objections against the Thatcham NE proposed housing development. There are many reasons why this development is unsuitable for this large development, which I will highlight below. I moved to this area 10-years ago as the area had a lot of green spaces. But the position of this new development, which is the size of a new village will affect a lot of the wildlife in the area. The increased traffic, increased footfall and increase in the number of dogs using the greenspaces will all negatively affect the wildlife and the quality of life of my other concerns.</p> <p>Currently in rush hour the traffic along Floral Way queues in the morning to join the A4. Then queues along the A4 to join the M4 along Pipers Way can be stuck there for 20-30 mins if 2 or 3 trains come along at the same time. An additional 1500 cars will exacerbate the current traffic issues in this area. This queueing traffic will create more air pollution, with the number of engines idling.</p> <p>The proposed development is going to add 1000s more cars to the roads in this area. The traffic in this area can only handle so much and people will start to look at alternative routes "rat-runs" to get to their chosen location. The small country lanes that run through a lot of this traffic would divert. These roads are small and are not suitable for high volumes of traffic. The potential level of traffic through Bucklebury would dramatically change this part of the village. The narrow country lanes through Bucklebury do not have the capacity to handle this traffic and will cause a risk to the walkers, cyclists, horse riders that use these lanes. Increasing the risk of serious accidents.</p> <p>The plan for an exit from the development onto Harts Hill will be pushing more traffic up through Bucklebury, and Coombe Hill. The roads or pavements to deal with this additional traffic. Harts Hill is a busy road, with a sharp bend on it, having junctions and traffic issues.</p>

	<p>The proposed development is on the edge of Area of Outstanding Natural Beauty (AONB), the increased light levels on the dark skies of the AONB. The views from the AONB will be dramatically affected.</p> <p>The plan talks about “A new community park linking Thatcham to the North Wessex Downs AONB”. These links connect the nationally important heathlands in the AONB, and the nationally scarce ground nesting birds that reside there. The dogs on the heathlands during Covid lockdown were significant. There will be a bigger increase in usage of these areas and the disturbance caused could lead to us losing the Nightjars that currently reside there.</p> <p>The management vision for Bucklebury Common, which has recently been developed a part of a Countryside Stewardship scheme, it's focused on not increasing pressure on the fragile ecosystem of the Commons. It's aim is to restore and nurture the heathlands. So, the proposed development so close to these heathlands is at direct odds with the management and protection of the heathlands.</p> <p>I have quite often seen hedgehogs crossing the road at Floral Way in the evening, going to and from the area where the fields and hedgerows are vital to the survival of hedgehogs, whose numbers are already in decline due to habitat loss. Hedgehogs are a mammal at risk of extinction. The loss of this important piece of their habitat would affect their numbers locally. Also, the increased traffic would also increase the number of hedgehog casualties on Floral Way.</p> <p>No evidence has been provided to show how this proposed development can have a positive impact on the environment. It has a damaging impact on the environment, and there appears to have been no recent ecological surveys to show the value of the heathlands. If no recent ecological surveys in place, they cannot have put in place any plans for mitigation for the species on this site. The appraisal accepts that SP17 will have a negative impact on the environmental sustainability of the area. The proposed development on this site so it will result in a negative impact on the environmental sustainability, and there are no signs of the plans to mitigate this.</p> <p>There doesn't appear to be a Health Impact Assessment included in the plans for this large development. So there has not been any having been discussed with the various healthcare agencies. The 3 doctors' surgeries that are responsible for this project are already overstretched and the plans for the development do not have any detail on how additional doctor capacity is being provided. It seems to have been a lack of any communication with the local care providers to work out how the additional capacity for dental practices are in a similar position of being oversubscribed locally.</p> <p>In December 2022 Michael Gove, Secretary of State for Levelling Up, Housing and Communities released a statement that the Planning Inspectorate should now be an advisory starting point and not mandatory. The statement also said that the Planning Inspectorate should not be a local decision making, which is sensitive to and reflects local constraints and concerns. Several local authorities have paused their planning process to await the outcome of the consultation, on the basis that a lower housing requirement would mean a council should pause their plans and put in place a revised plan in line with the updated planning guidance when it is released.</p> <p>I am sure there must be more suitable brown field sites locally, which would have a much less negative affect on the wildlife. Where better provision for schools, healthcare and schools can be made.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Willis, Angela
Consultee Full Name	Angela Willis
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS805
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 19:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to express my concerns regarding the new housing development proposed for North of Thatcham.</p> <p>NOISE AND LIGHT POLLUTION: With increased building over several years the sustained inconvenience and noise hinder everyday work and pleasure to many people in Upper Bucklebury. My concern is that WBC/Developers have Residents of Upper Bucklebury and Bradfield Southend have a "No-Street light" Policy but My concern is that for light-pollution could have serious negative effects if this is not addressed.</p> <p>ENVIRONMENT: Biodiversity in the Bucklebury Plateau is an essential amenity which WBC has a legal duty to protect on the Wessex Downs. It is not sound policy if a lack of investigation or analysis of the overall effects of major developments in or near an AONB site are ignored.</p> <p>TRAFFIC: Harts Hill is a major road to Upper Bucklebury, Bucklebury, and Chapel Row which is unlit, therefore is a dangerous road often resulting in accidents as demonstrated during the severe frosts we recently experienced. My issue near Harts Hill will cause severe disruption to all of Harts Hill and all along the Common towards Bradfield Southend Thatcham. Repeated road disruption along Harts Hill by the Waterboard has had significantly negative effects. I believe plan for this area in Harts Hill.</p> <p>INFRASTRUCTURE: MEDICAL/DENTAL CAREIn this area North of Thatcham, Dental Practises are few and GP surgeries with the existing population. Without a clear plan for persuading medical and nursing staff to move to West Berkshire surgeries are up to their population limit; therefore any increase might break the system with medical staff leaving the area that WBC has not recognised this negative problem of increased workload on current GP's and the lack of NHS Dentists.</p> <p>INFRASTRUCTURE: SERVICES: Many companies are currently experiencing under-staffing and subsequently cover waste collections, road/hedge maintenance, sports provision and maintenance of such facilities etc. With increased housing have a negative impact.</p> <p>INFRASTRUCTURE: EDUCATION: Though I do not know details of the current provision of Infant and Junior schools, housing often brings young families with needs of health care and schooling. My concern is that there will be more pressure on all services with negative effects.</p> <p>Overall, I find that the WBC Local Plan Regulation lacking in several areas which therefore could have major negative effects.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dickens, Annette
Consultee Full Name	Annette Dickens
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS813
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I understand the recommendation that the SP17 site be considered for large scale development was as a result of WBC's expenditure of £100K on a HELAA study. Other sites were rejected including one part brownfield site where the developers were rejected by the railway. This would alleviate a long running concern for the residents of Thatcham and Bucklebury over long delays in the development. Even by the LP's limited analysis will get much worse if SP17 went ahead.</p> <p>When a 500 home development was proposed for Siege Cross in 2015/6 WBC in its objection said there had been a conflict with national and local policies. WBC considered the site to be a valued landscape in which the development would cause significant harm. However some 7 years later SP17, a development with 3 times the number of homes in the same area, is not considered to be a problem.</p> <p>The Sustainability Appraisal in the LP states SP17 will have no negative impact on sustainability. This opinion is not supported by the SA is unsound.</p> <p>I have concerns about the impact of SP17 on the environment, Bucklebury Common and the setting of the AONB. The required biodiversity net gain has been seriously considered as part of SP17. The impact on biodiversity of SP17 appears to be significant.</p> <p>SP17 would see much more traffic turning onto Harts Hill Rd particularly when traffic on Floral Way and the A4 is backed up. Harts Hill will encourage more traffic. The location of SP17 will mean car borne travel will dominate. There is no assessment of the increase in Upper Bucklebury which will pose highway safety issues. In addition an oil pipeline running along the South of the site could well restrict the number of exits forcing more traffic to use the Harts Hill exit.</p> <p>Overall I think SP17 was put forward in a hurry without due consideration when the Grazeley option fell through. It is a greenfield site, not sustainable and lacking in adequate medical and education provision. There is also not nearly enough public transport and infrastructure support. It is unsound and should be withdrawn or at least amended significantly.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Smith, Yen Fang and Tony
Consultee Full Name	Yen Fang and Tony Smith
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS817
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 23:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	We would like to submit our opinions- object to Thatcham NE development building plan. We do not wish to have 2
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	McGarvey, Shane
<p>Consultee Full Name</p>	Mr Shane McGarvey
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS825
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	02/03/2023 16:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I object to the Thatcham NE development on grounds of:</p> <p>Road safety</p> <p>The proposed entry from the development to Harts Hill Road will increase traffic on an already unsafe country lane in Bucklebury, Chapel Row and Bradfield Southend, creating a 'rat run' for traffic avoiding the A4. People from Upper Bucklebury often walk down Harts Hill Road to Thatcham and any increase in traffic will endanger lives.</p> <p>Pollution</p> <p>Apart from the ongoing pollution once the vast housing estate has been built, there will be massive pollution, particularly from the entire build, subjecting residents to major health issues already well documented.</p> <p>In addition, there will be massive noise pollution for years, and light pollution affecting the AONB next to the site, with impacts on animals such as owls and bats.</p> <p>Healthcare</p>

	<p>Local GP surgeries and dentists are already overrun. The development plan makes mention of a (wholly inadequate) with the assumption that third party providers will open up shop there. But with GPs these days pooling resources to incentivise to open a small satellite surgery. The outcome will be even more pressure on existing services, and anyone appointment these days will tell you that will become a nightmare.</p> <p>Services</p> <p>There seems to an assumption that third parties will line up to fill in the gaps in your plans, in addition to healthcare providers will provide water and waste services, and various electricity companies will magic up enough to power the extra homes encouraged by government policy over the next few years.</p> <p>In addition to the objections above, the housing market is facing a perfect storm of events conspiring to cause a slump in business. The increase in lending rates and uncertainty about the future are driving this. One builder expects to build 15,000 a year, compared to almost 15,000 last year. This trend is likely to result in a delay in building houses en masse, with a number of years, consigning us all to incessant disruption for years to come.</p> <p>Having read much of your proposals, this is an ill-considered plan, with reports seemingly written to accommodate the consultation, with for example health authorities, has not even been conducted.</p> <p>Local governments are happy to shout about their commitment to conservation and the environment, but West Berkshire is not by proposing such a development on a greenfield site right next to an AONB. This proposal is unsound and I urge you to focus development on existing brownfield sites only.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Thomas, Sian
<p>Consultee Full Name</p>	Sian Thomas
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS833

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	01/03/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I write to object to the plan. I find it to be unsound for the following reasons: Environment I have lived in Upper Bucklebury for 35 years. This is within a designated Area of Outstanding Natural Beauty. I believe that the open countryside proposed for a large part of the development will be detrimental impacts to protected wildlife. There does not seem to be any evidence of a positive impact on wild

adequate green space and protecting biodiversity. The two “country parks” proposed in the plans have now been done. There appears to be no evidence of any sound attempt to investigate, analyse and address the consequences of such

Transport

There appears to be a plan for an exit road at the north of the site onto Harts Hill Road. This is a challenging road, even under ideal conditions. There are no modelling results for this proposed junction, the displacement of A4 traffic will, therefore, be directed towards Upper Bucklebury. The roads into, out of, and within the village are mainly unsuitable for large volumes of traffic and this increase in traffic is considered to be a major risk of danger and could lead to loss of life. The council assessment of the proposal is a reduction of accidents and safety. How is this proven?

Healthcare

There appears to be very little detail into strategic healthcare planning; neither WBC nor the developers, appear to have any prospective 1-hA specific to the proposed North-East Thatcham development. It seems that there is no direct engagement with the Health Consortium and local general practices. When considering how new GP practices are commissioned by NI-IS England, alongside the fact that it would appear to be of little or geographic sense for an existing GP practice in the area to set up a branch surgery, it seems unlikely that appropriate provision will be made in a timely fashion, if at all. Surely this complicated and essential provision cannot be left until the development is approved. Dental practices in Thatcham are under severe pressure to provide care for existing residents. Pharmacies in the area are unable to provide an adequate service. WBC and the developers appear to have neither arranged a relevant 1-hA nor provided evidence of having appropriate agencies or providers.

Education

Provision for education for the whole age-range is not clearly defined. Secondary school provision appears unsound in respect of anticipated number of pupils; location of a school; the timing of provision of necessary funding. The development plan states that the development is not sufficient to fill a 6-8 FE school, a new school to be smaller than 6FE. Bucklebury children would probably no longer have a choice between the Kennet School and the Downs School for their secondary education. There are no details in the LPR of the provision for Nursery or Early Years. The provision for Primary education is unclear. How can this proposal go forward without significantly increased information, research and assurance of the necessity for such provision? In summary, it appears that, in order to meet an arbitrary target for new development, an easy option has been proposed for the area only.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cornell, Adrian
Consultee Full Name	Adrian Cornell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS892
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	27/02/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would first like to say that after Dunstan Park was developed it was said there would be no development on the north to prove this unfortunately. Then Peter Simmonds the farmer sold his house and yard which was developed which is <personal information removed></p> <p>The proposal site for the development of 1500+ houses is totally unsuitable for the following reasons.</p> <p>1 Transport</p> <p>These day we are not talking about one car per household. Where I live in <personal details> most properties have five. When my late wife and I moved here in 1964 Harts Hill and <illegible> Lane was already a rat run and we have since then. A North exit from the site would cause caos at peak times. Obvious choice to go to Pangbourne and Reading refuges for pedestrians.</p> <p>1 Education</p> <p>The scools in the area have been extended so many tims to accommodate past development. Playgrounds are not b provision in the area for new schools. I don't think so.</p> <p>1 Health</p> <p>Same as education. The surgeries in the area are bursting at the seams. It is difficult to obtain a phone call let alone a Dentist are in the same situation.</p> <p>The whole thing will end in tears. More cars more pollution more environmental problems more accidents. Why do we We don't. Central Government dictates the number and councils don't resist.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cooper, Tim and Noelle
Consultee Full Name	Tim and Noelle Cooper
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS854
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	01/03/2023 19:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>OBJECTING to plan SP17 as it is unsound due to the following reasons and negative impacts:</p> <ul style="list-style-type: none"> - My wife and I are keen cyclists and the increased traffic on local roads will make our commute and leisure cycling more difficult. - Whilst the development itself may be designed for safe and sustainable transport, the existing road network around the development does not support safe and sustainable transport for the existing wider community. - We currently use the Chapel Row GP surgery, which is already at capacity. The addition of these houses in the immediate vicinity will put further significant pressure on our first line health care for doctor appointments and dental care. - We both enjoy walking and cycling in the countryside and woodland in our local area. This countryside supports several ancient woodlands and heathlands. Increased population and noise due to this development will put further significant pressure on these areas. For example failing to protect endangered species, such as the Nightjar or Cuckoo. <p>Please carefully consider these points and their negative impact on us and the local environment.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Dorich, Miranda
<p>Consultee Full Name</p>	Miranda Dorich
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS994

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to raise my objection to the proposed development in NE Thatcham outlined in the Local Plan Review. There are components of the plan that are clearly unsound and the development will have a hugely negative impact on residents of Bucklebury Parish, where we live in the following ways.

	<p>1 Increased traffic in and around Upper Bucklebury, Chapel Row and other parts of the parish. The flow of traffic on the Common is already fast and dangerous making it unsafe for walkers, cyclists and wildlife.</p> <p>1 Negative impact on the environment. The collateral damage to the Common will be huge as there is no proper plan for the development. This will result in an overspill of people and traffic into the adjacent areas of the AONB. The Common is a rich and fragile ecosystem.</p> <p>1 Negative impact on healthcare provision for existing residents as the local GP practices are already overstretched and will not be able to cope with the necessary influx of new residents.</p> <p>1 There is no clearly defined plan for the provision of schools. The data used in the plan is based on 12 year old data which is oversubscribed.</p> <p>The WBC should be focussed on representing it's existing residents and the preservation of it's existing environment and not the loss of greenfield sites to the detriment of many and benefit of a few.</p> <p>To me this development is nothing more than urban sprawl and the destruction of the boundary between a rural village and a town.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>1 There is no clearly defined plan for the provision of schools. The data used in the plan is based on 12 year old data which is oversubscribed.</p> <p>The WBC should be focussed on representing it's existing residents and the preservation of it's existing environment and not the loss of greenfield sites to the detriment of many and benefit of a few.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Loader, Graham
<p>Consultee Full Name</p>	Graham Loader
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1014

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I object to the Thatcham North East Housing Development plan. The plan is to build an excessive number of new houses on an area that can not support it. The plan would have huge detrimental consequences for the natural environment and current residents of the area.

	<p>Thatcham has already experienced rapid growth and is a very large area of houses without the supporting infrastructure. This has led to congestion on the A4 and at the railway crossing at Thatcham station. The large volume of slow moving traffic at bus stops has led to poor air quality. This development would dramatically increase this issue and residents of the new development would be locked in their development due to congested roads.</p> <p>The plan would see a very large increase in traffic through Upper Bucklebury on Harts Hill Road. This road is already dangerous and there have been a number of recent accidents.</p> <p>My two children travel from Upper Bucklebury to Kennet School in Thatcham, and have to use the road for cycling on a daily basis due to fast moving traffic on a narrow road and no foot pavements out of Upper Bucklebury. The plans would dramatically increase the addition of heavy vehicles during construction it would pose a real risk to all children who have to make the trip to school.</p> <p>The plan does not include enough provision for new services to support new residents where local services are already in place. The plan does not definitively include a new secondary school which would be absolutely required. Kennet School is already full and residents will find themselves having to travel outside the area for second school provision, which would in turn increase the time when we are battling climate change.</p> <p>The development site is green fields and will involve the destruction of wild areas. There are other much better suited sites that will not destroy wildlife habitat.</p> <p>Any development should be much smaller scale in smaller areas, using brown field areas or redeveloping industrial areas.</p> <p>The development will essentially border the Area of Outstanding Natural Beauty, this will lead to a large increase of traffic in a delicate area of countryside.</p> <p>This will directly reduce the quality of life of residents of both Upper Bucklebury and Thatcham who use the area for walking and cycling areas.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Whitmore, Naomi
<p>Consultee Full Name</p>	Naomi Whitmore
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS1018
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing to object to the proposal for 1500 houses at the NE Thatcham Development. Please forgive me if I am not but I have no experience in planning. My objections are:

Pet ownership. 27% of the UK population own a dog. As this is a national average, I would expect the number of dogs to be higher. It is inevitable that a large proportion of the new residents of the north east Thatcham development will be dog owners. Dogs are common. Assuming dogs are walked twice a day, we are looking at 810 walks a day. This would have a colossal impact on the local environment, plants, to name but a few. Dogs, as wonderful as they are, are not quiet wildlife loving animals.

Public transport in Thatcham is poor, therefore the majority of the 1500 households will have a minimum of one car, and the increase in traffic around will be detrimental to this quiet residential area.

There is very limited parking at the Bucklebury common, so it is likely that cars will be parked on narrow roads where they are not intended. There are no footpaths so this would also cause a danger to pedestrians.

Many of the roads around Bucklebury are designed 'quiet roads'. There must be very good reasons why these were designated as such. It is a contradiction that an area where the council consider quiet roads are a good idea, for planning to be considered for a development, and the Berkshire Council enforce these 'quiet status'?

The roads around Bucklebury, Cold Ash, Chapel Row and Beecham (as well as the smaller villages) are not suitable for a development of 1500 homes will generate. Many of the roads are suitable for single file traffic only. Many of the roads do not have footpaths.

The train crossing in Thatcham is already severely congested at many times of the day, particularly in rush hour. The development (most likely more than this as many households will have more than one car) will have a considerable impact on the local road network in the station area, which is already very poor at busy times of day. Queues already build up in all directions and this situation considerably worse.

This scale of this development is out of keeping with the local area. Bucklebury is a relatively small village. The impact of Bucklebury will irreversibly change the intrinsic nature of this village.

We currently have an energy crisis and food costs are rising. It seems illogical to be looking to build on green fields. Green fields, agricultural land, there are many other uses that would be appropriate. I would like reassurance that West Berks Council will not allow for use of this land.

It appears that there is not jobs available for an additional 1500 people (or 3000, assuming two adults will be working) in the area. Will it be suitable?

In summary, I strongly object - a development of 1500 homes is out of proportion for this area and should not go ahead.

As a final point- I note that Catesby Estates which is promoting the scheme for north east Thatcham says "This sustainable development provides a unique opportunity to deliver a sensitively designed energy efficient residential scheme" There is nothing wrong with a development of 1500 homes on the edge of a small village. I am shocked that West Berkshire Council has allowed a business to make such a claim. I request that this statement is removed. In addition, there is no explanation for what is sustainable about the development. The development is used inappropriately and should not be allowed by West Berkshire Council. I am extremely concerned that West Berkshire Council is acting on its behalf to make unsubstantiated claims. <https://www.catesbyestates.co.uk/land/land-to-the-north-east-of-thatcham/>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hudson-Smith, Sally
Consultee Full Name	Sally Hudson-Smith
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1022
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	06/03/2023 14:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>I would like to strongly voice my objection to the proposed planning application for a shockingly large number of houses in Thatcham.</p> <p>We know new housing is necessary, but this application is triple the number of houses that are right for such a space.</p> <p>This sight of "outstanding Beauty" is not being considered for a few homes with careful design and space and infrastructure. No the developers plan to cram houses in that have small gardens, too close together with therefore little privacy.</p> <p>The roads in the surrounding area will be jammed and this will affect the quality of life for everyone in the surrounding area of houses and therefore people to put in a small area and such a short sighted way of increasing housing.</p> <p>Schools and doctors surgery's will not be able to cope with this influx of people.</p> <p>I feel the West Berkshire council will not taking the publics options into consideration and the developers will do what they want exchanged!</p> <p>Let's see how many councillors move into the development once its built?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ames, Mark
Consultee Full Name	Mark Ames
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS870
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 07:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>As a resident of Upper Bucklebury, I am disappointed to hear of the proposal to build up to 2,500 homes on the site adjacent to Floral Way and Harts Hill. I object to the proposed plan on the the basis that it is unsound and note t</p> <p>Transport</p> <p>The A4 and Floral Way are already contested at peak times, together with long tail backs to the level crossing. Thato struggles at peak times to cope, without the addition of further homes and therefore additional traffic, at least one ca which will join already contested routes and increase pollution.</p> <p>I note that there is a proposal for an exit to the site on Harts Hill, but the location of this is unclear. There appears to use of this exit and the impact, or drawings to highlight the location. Harts Hill is steep and bendy, and the recent col ice patches. Pedestrians and cyclists use the road as there is no pavement. The addition of further traffic will increas</p> <p>Furthermore, it is highly likely that much of the traffic exiting from Harts Hill will go on to travel through Upper Buckle towards Cold Ash. In both cases, going past Primary Schools (Bucklebury Primary and St Finian's) where children a will lead to safety concerns. It is already very dangers passing St Finian's School at school drop off and pick up times overtaking parked traffic. The increased traffic will also impact on the nature of these lovely villages which are on the Natural Beauty.</p> <p>The Plan does nothing to explain how the infrastructure will cope, advise how safety in the areas stated will be addre villages which is adjoins.</p> <p>Environment</p> <p>The development is on greenfield site rather than developed land and is adjacent to Bucklebury common, home to a woodland. Due to the traffic concerns highlighted above, there will undoubtedly be additional traffic driving though the natural beauty increasing noise and pollution.</p> <p>There will also inevitably be an increase in footfall on the common which will be detrimental to the fragile ecosystem. Bucklebury Common is focused on not increasing human pressure on the common, but with the homes so near this is I am unable to see any way of mitigating.</p> <p>Healthcare</p> <p>All residents should be able to obtain access healthcare facilities, however, these are already overstretched in the ar not been consulted. The Plan therefore does not provide comfort or evidence to confirm that adequate provision will</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Maja, Stefan & Michelle
Consultee Full Name	Stefan & Michelle Maja
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS888
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 07:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I object to the proposed development to build 1500-2500 houses in NE Thatcham for a number of reasons 1. Volume This is excessively large amount of houses that the local infrastructure cannot support – can the number be reduced 2. Traffic This could be anywhere between 1500 and 5000 extra cars on the roads in the area. We are particularly strongly ag on Harts Hill road. This is a country road and would encourage many cars to use it as a rat run to bypass the A4 which number of cars passing through Upper Bucklebury/Chapel Row/Bradfield Southend 3. GP's/Dentists Where are the GP's and dentists to support all these people – we already experience delays of many weeks to get a 4. Education Where will the children of these houses seek their education, more importantly existing residents in areas more distant to have their selections restricted or unavailable 5. Environment We live in an AONB which could be badly affected by the volume of people seeking recreational activities locally This development may provide many houses but I see little or no planning to deal with the local infrastructure to cater We already had the extensive development of Dunstan park and WBC is now back for another tranche of housing just somewhere else.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	1. Volume This is excessively large amount of houses that the local infrastructure cannot support – can the number be reduced
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We are happy to attend any public enquiry that may result from this development
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Logan, Stuart
Consultee Full Name	Mr & Mrs Stuart

	Logan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS896
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

* No	
Please give reasons for your answer	<p>I write in respect of the proposed development to the NE of Thatcham. I live in Stanford Dingley where I am a parish council member. I have contributed to our village design statement and expressed our collective desire that the rural character of the Pang Valley and adjacent areas be preserved and protected from urbanisation.</p> <ul style="list-style-type: none"> • This proposed development would crawl up the southwest facing slopes of the common either side of Harts Hill, a challenging busy narrow road. To my knowledge there has been at least one fatal accident, as well as regular accidents over the years. The possibility of 2,500 extra households disgorging cars, cyclists and pedestrians onto that road is not something we should be considering. The village communities of Stanford Dingley, Bradfield, Upper and Lower Bucklebury all use Harts Hill and Newbury. It is already busy and sometimes very busy. Please do not make that worse. • Secondly Cox's Lane is a charming narrow winding byway that I cycle on a fairly regular basis. The quietude and beauty of the area for recreational cycling and a picturesque link between Bucklebury Common and the Kennet & Avon Canal towards Newbury, equestrians and walkers along Cox's Lane. The proposed development would irrevocably change its precious character. • There is much talk nowadays of preserving and enhancing the natural environment. The south facing slopes of the common, this development would occupy, are favoured by the sun (each 10% of upward slope towards the sun doubles the amount of light) and are special habitats that warm quicker in the spring and remain more sheltered in the winter. This encourages a rich flora and animal than does a north facing slope. Please don't destroy this precious habitat. • Not only is it precious but it is a beautiful green lung. One can look down towards Siege Cross Farm from Cox's Lane, which mitigates the urban sprawl and the hideous industrial estate. Even from Hart's Hill and Upper Bucklebury there are views of the Downs and the Kennet Valley unalloyed by urbanisation in the foreground. Please don't spoil these views. • Lastly, I'm led to believe that other sites are available, south of the A4, which could provide a much needed croft or farm east of Thatcham. That would be a clever option because the Thatcham railway level crossing is a nightmare to cross. <p>To sum up I object to the proposed development and my wife (Mrs SHA Logan) would like to associate herself with the objection.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cant, Antony
Consultee Full Name	Antony Cant
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1038

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I would like you to note my objection to the proposed Thatcham NE development. <ol style="list-style-type: none"> 1 The increased volume of traffic will put a further strain on the already congested A4 Bath Road forcing more cars "rat run" to avoid the A4. 2 Bucklebury Common is an AONB with a delicate eco structure and home to much wildlife. It can barely support alone with a further 2500 homes on its door step.

	<p>3 I have not seen a health care impact assessment, our current GP's and dentists can barely cope without adding lists.</p> <p>4 It feels to me that Westberks Council are trying to meet government new homes requirements without giving enough thought to the required and ecological impact it will have.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Tayton, Chris
<p>Consultee Full Name</p>	Chris Tayton
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1054
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	03/03/2023 15:37:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	

<p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the Local Plan under consultation insofar as it includes a proposal to build 1,500 house in N</p> <p>I object to the plan as I find it unsound.</p> <p>1. Thatcham has already been the subject of a disproportionate level of planning compared with other equivalent small town as it existed in the early 1980s is barely recognisable today and the sense from the local plan is that this easy fix to meet planning targets with little or no regard to the impact this development will have on the surrounding areas or the safety of the communities.</p> <p>2 It really is disappointing that those elected to serve West Berkshire are doing so little to protect our landscape and ill-thought out Local Plan which will permanently negatively impact the community and disfigure the countryside.</p> <p>3 When history judges the decisions made by those constituting West Berkshire Council today, a decision to implement be looked back on as a major mistake and misjudgement by those individuals involved.</p> <p>4 I cannot see how the Local Plan's proposal to build such an enormous volume of buildings has even begun to consider the development will have on the environment and the communities. Once what we have is lost it will be lost forever. The damage that the Local Plan will cause. Ancient woodlands will be decimated, countryside enjoyed by local communities and wildlife will be sacrificed. And all to meet unnecessary and inflated home building targets when a more creative additional housing needed by the communities could and should be achieved on a basis which shares the impact of Berkshire.</p>

	<p>5 Looking at the disproportionate and unsustainable effect the 1,500 houses will have on local amenities it is surprising out for consultation. Every single resident in Thatcham and the surrounding area, my family included, will permanently</p> <ul style="list-style-type: none"> • worse transport • worse air quality and more pollution • worse healthcare • worse education services <p>Those making this decision should consider very carefully the permanent damage the proposal to build 1,500 homes in the Local Plan will cause and the dreadful legacy this will leave for current and future generations who choose West Berkshire.</p> <p>The Local Plan should not be adopted.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Atkins, Rebecca
<p>Consultee Full Name</p>	Dr Rebecca Atkins
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1058
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS</p>	E-Mail

* Web * Unknown	
Response Date	03/03/2023 15:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Please find below my concerns and objection to the Regulation 19 consultation regarding the proposed development. I appreciate the need to invest in new housing, there are various elements to the plan that are clearly unsound and do not have the risks mitigated. This will undoubtedly lead to negative consequences for both existing and any new residents in terms of local infrastructure and environment.</p> <p>Traffic and Transport:</p> <p>Firstly, regarding transport and traffic. This area already struggles with traffic issues. We are on a main through route junction at Theale, and the A4 is already stretched by the current traffic, with rural routes through Upper Bucklebury taking some of this strain. The addition of up to 2500 additional houses at the NE Thatcham site, specifically the proposed road will vastly increase this road traffic with the risk of accidents, pedestrian injuries and wildlife collisions all increasing. We already have problems with speeding and road maintenance (significant potholes regularly causing damage to vehicles) and the increased traffic burden will only make this worse. Villages such as Upper Bucklebury, Bradfield Southend and Colton are also centres located on these main through routes, some of which have little/no pavements, which raises significant concerns for safety as well as the air quality risks. There are also risks to car users on these rural routes, in the form of large wildlife (Deer) which are common numbers in the woodland surrounding our villages. These do significant damage to a car and its occupants when hit.</p>

The plans also propose a new car park on Harts Hill Road. This road is already a high-risk area for accidents, with speed bumps and year-round large potholes, any additional traffic will worsen this risk to new and existing residents alike. Furthermore, the noise and behaviour in the carparks located on the common, loud music playing, recreational drug abuse etc and further carparks.

I note the comments that you feel the development will 'increase the opportunities for walking, cycling and use of public transport'. As a confident cyclist I already chose not to cycle down Harts Hill road due to the risks outlined above. An increase in road traffic in the village will only decrease the safety of cyclists. Furthermore the proposed development will obstruct (even if only partially) a **beautiful and safe** walking route from Upper Bucklebury into Thatcham via Colthrop farm that I regularly use. This will force further road use rather than reducing it. The plans mention improving public transport, we currently have a bus that goes through the village 3 times a day with very limited stops. As a result the usage is low as it is impractical. By whom are the improvements funded? What will this mean for residents? This information has not been provided and vague statements cannot be relied upon for mitigation. The roads in these small villages are simply not suitable for large vehicles and keeping the roads quiet and safe in the way that our 'Bucklebury quiet lanes' currently are, has got to be a priority for encouraging sustainable travel.

Infrastructure:

Secondly, considering healthcare provision for new residents; whilst the plan proposes a primary care facility will be in place, there is no evidence that any strategic healthcare planning has been considered. As a Doctor working in the NHS I am all too aware of the staffing and funding of healthcare, and is incredibly rare for NHS England to create a brand new healthcare facility without the amalgamation/extension/expansion of existing practices. Any expansion or relocation of existing services would have to be considered. Whilst large 'Super Practices' are perhaps suitable in towns/cities, in our rural setting this would inevitably lead to a situation where those who need it most are unable to access healthcare due to physical distance and poor public transport. The surgery at Thatcham is covering a large number of patients whose health and wellbeing cannot be compromised by the addition of 2500 new homes. Neither can we expect our already overstretched GP colleagues to simply 'cope' with these thousands of additional patients, likely be young families requiring maternity care, childhood vaccinations etc. There is no evidence that local practices have been considered in these plans. This development simply cannot go ahead without the **guarantee of an adequately sized and staffed facility** to avoid unacceptable risks to existing residents, new residents and the current healthcare staff.

I have similar concerns regarding the provision for educational facilities/spaces for this new development. The plan states that 'will be provided' but gives no detail on how, where, when and funded by whom. This applies to both nursery/early years and school places. The document states that £12million will be provided for primary education, however this appears to be for the year 2011 and again doesn't provide any details on when, where and how this educational requirement will be met.

Regarding secondary education, the development plan states that the size of the NE Thatcham development is insufficient for a secondary school as it does not meet the size requirement set out by the government that schools need to be a certain size to ensure facilities/sustainability. This will result in the existing schools needing to take on new pupils. It is not uncommon for schools to have to take on families with children in different schools, having to travel out of area for schooling or even move to facilitate schooling. The plan does not provide as to how the existing secondary schools will be able to cope with the additional students. No evidence of a plan to expand or to whether expansion is possible at their location, nor whether staffing will be adequate to allow for these additional students.

Educational provision needs to be robustly planned and established before any building work could take place as residents would be moving in immediately on moving in. Therefore I have significant concerns that this planning is inadequate in this regard, and that the statement 'will be provided' is insufficient.

Environment/wildlife:

The importance of living sustainably and minimising our impact as a species on the environment has never been more important than in the shadow of a worldwide pandemic and are hit by increasingly common extreme weather events, it is essential that our human activity must be done sensitively and in an environmentally sound way.

The building of 2500 homes on what is currently an area of farmland and ancient woodlands will result in around 4000 additional people on the area. This increase in human burden, especially as the plans state the intent to encourage links from the new development via this area 'accessible to all users' (ie including road traffic) completely contradicts the current management vision of the ecosystem that exists on Bucklebury common. The threat that this puts on legally protected wildlife, ancient woodlands and the recreation currently available for recreation is undeniable. The Parish currently work so hard to protect, nurture and restore the common as a haven for wildlife. This will be extinguished should this development go ahead, turning a unique and rural village into a residential area of Thatcham.

The plans do not show how adequate green and biodiverse spaces will be incorporated into the site itself therefore it is unlikely that residents would choose to visit and enjoy the common and area surrounding the site. It is clear that WBC does not value the common as the original proposal for two 'country parks' in the initial Thatcham growth plan has now been downgraded into a village green. There is clear evidence that the legally protected wildlife within the area will be adequately conserved. There are unsubstantiated claims that risks can be mitigated, but the LPR's own sustainability appraisal states that it will have a negative impact on sustainability simply because of the size of the site! This does not consider all the other negative impacts an additional 4000 people would have on the local ecology.

There is **no evidence** in these plans that the development will benefit the environment, with **clear evidence** that simply building 2500 homes will result in a negative impact on environmental sustainability.

Please accept this letter as my strong objection to the NE Thatcham development on the grounds that the impact of the development on infrastructure (particularly **healthcare** and **education**) and the **environment** (both ecological and quality of life for existing residents) has **simply not been adequately considered nor risks mitigated**. The size of this development is completely disproportionate to the only negative impacts on the local community and area.

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

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Adams, Kirsty
Consultee Full Name	Ms Kirsty Adams
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1068
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>I am writing to object to the proposals for new housing development in the North East Thatcham area.</p> <p>I have been a resident of Upper Bucklebury for the last 21 years and was attracted to the area because it was a quiet village with Outstanding Natural Beauty (Wessex Downs.) Over the years small but necessary areas of development have made the village more accessible but also have been to its detriment. I cannot begin to imagine how much of a detriment to current and future residents this will be.</p> <p>1. The quiet village of Upper Bucklebury would become a rat run for traffic. It is already used as a rat run to avoid traffic but 2500 extra households would result in excessively high volumes of traffic through the village which would be damaging to the natural environment and the wildlife here, as the road runs across Bucklebury Common it would be damaging to the natural environment and the wildlife here, roads here are currently inadequate for the volume of traffic we have already, and the walking route along Harts Hill to the village. More traffic will worsen this.</p> <p>2. The schools provision in the plan is not only inadequate for the size of the proposed development, it will be significantly reduced for those who currently reside in the area, breaching the Council's obligations to provide education for all children. Kennet School families who currently live a little further away but are still in catchment (ie Bucklebury children) will be forced to travel further to school.</p> <p>3. Bucklebury Common and parts of the surrounding area is an area of great biodiversity but is also a fragile habitat. The proposed development will cause immeasurable damage to the Common, from traffic, footfall, light pollution, and reduction of green space which will be detrimental to the environment. I can think of no way that the proposed development could do anything other than be a very bad thing for the environment. The proposed development has only very vague and poorly defined plans for leisure spaces and playing fields means that the village here will be overwhelmed.</p> <p>4. The proposals for healthcare - doctors surgeries and dentists - is inadequate. The existing surgeries and dentists' services and provisions being made are not sufficient to support another 2500 homes.</p> <p>Overall, the plan is unsound, and is not a sustainable one. My letter here is brief and not as eloquent as many you will receive, but I say very much as strong as those others who have written to you in greater detail.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Shillam, Geoffrey
Consultee Full Name	Geoffrey Shillam
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1107
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	07/03/2023 12:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>I am writing to object to the large scale residential development in North East Thatcham extending to Bucklebury and... The amount of damage to wild life habitat would be considerable, at a time when numerous surveys have highlighted... of birds, butterflies and invertebrates</p> <p>We all benefit from exposure to wild life and open spaces. This large residential development will result in opposite... of life for large portions of the local community</p> <p>Please re consider these developments</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dickson, Susan
Consultee Full Name	Susan Dickson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS912
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to register my objection to the above development and have detailed below a summary of the reasons for</p> <ul style="list-style-type: none"> - the impact of the traffic increase, very like to be 5,000 extra cars for 2,500 houses on semi rural road infrastructure any increased volume. - the roads surrounding the proposed development are narrow and winding - I.e Harts Hill Road, this road is already used by cyclists and large lorries with no opportunities for passing - insufficient increase in the infrastructure to support this volume of housing, doctors, schools etc <p>Please consider this development with the integrity that should be given to completely changing an environment with</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Wastie, Kate and Harrison</p>
<p>Consultee Full Name</p>	<p>Kate and Harrison Wastie</p>
<p>Consultee Organisation</p>	

Agent Full Name	
Agent Organisation	
Comment ID	PS917
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>On the North East Thatcham plan for a very large housing estate, my particular objections are:</p> <p>There will be increased traffic through Upper Bucklebury and Chapel Row and a problem at the junction on the Pangb proposed a new roundabout on the narrow Harts Hill road to allow traffic in and out of the northern end of the develop Harts Hill; this will cause additional congestion on the A4. Cold Ash will see a large flow of traffic going towards Chie narrow and many do not have pavements; cycling would not be safe.</p> <p>There is insufficient capacity at Kennet school (oversubscribed) and no other plan has been made. School provision and facilities on such a gradient have not been costed.</p> <p>On Wildlife: Bucklebury common would be subjected to an increased number of visitors and the delicate ecosystem v There is no evidence of or any strategy for increased biodiversity. A "country park" mentioned in the plan does not n the three small areas inside the settlement boundary are not of any proper environmental value, some "wildflower m nightjars or great crested newts.</p> <p>The strategic gap between Thatcham and Bucklebury; Upper Bucklebury will lose its identity when Thatcham and Bu developer in Cold Ash has just been refused permission for this reason.</p> <p>Medical provision: additional GP surgeries are not part of the NHS strategy for the future. No local surgeries have th surgery of 450 square metres as suggested.</p> <p>Number of houses: Initially 2500 houses were to be built in total, 1250 in the plan period. This has now been increa Any mitigation of the impact of the development should be largely completed before sales however what normally hap poverty and delays this work until the site is largely complete. The developer will wish to utilise the area originally de 1000 after this LPR plan period finishes.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Sanderson, Clare</p>
<p>Consultee Full Name</p>	<p>Clare Sanderson</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS930</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 17</p>
<p>Chapter / Policy / Appendix Title</p>	<p>North East Thatcham Strategic Site Allocation</p>

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	It will dramatically reduce the greenbelt between Thatcham and surrounding villages therefore losing the rural nature over development of our beautiful countryside in an area which consists of rolling hills and farmland. If development will not be any open rural areas left for future generations to enjoy. The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood p Significantly increased traffic and pollution through the surrounding villages. Many of the small local roads through t safety concern as they are very busy at peak times and many don't have pavements and street lights. Hermitage Ro as a cut through to the M4 with the traffic calming islands causing long queues of traffic at peak times blocking entry and causing drivers to take unnecessary risks to speed through them. This development will exacerbate the traffic p the road safety concerns.

	<p>This level of additional housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services. The area is already overstretched. From speaking to local GPs I understand they have been already been told that the development will result in a large increase in numbers as no new medical facilities will be created. This seems highly presumptuous to be confirming the development going ahead at this stage before all of the objections have been received, read and considered. Since moving to the area, it has been difficult to access NHS dental care. Most local practices will take on new NHS patients but continuing staff shortages already exist. Waiting for appointments and high chances of cancellations. These services cannot appropriately support any increase in the number of residents.</p> <p>Please do not take away the opportunity (for our families today and future generations) to live and play in our beautiful village. We would like Thatcham housing development go ahead.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Glasgow, A
<p>Consultee Full Name</p>	Ms A Glasgow
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1111
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	03/03/2023 16:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>We wish to formally register feedback to the proposed local plan on the following basis:</p> <ol style="list-style-type: none"> 1. The proposed development has no regard for infrastructure or the subsequent impact that a development of this size will have on the surrounding villages, transportation links or residents. Significant changes to the infrastructure would be required to 'mitigate' impact to the development. From major rail network which will need to support commuter connections. Nothing in the local area, including the A4 is suitable to manage this. With only a small % of roads even having payments (Cold Ash 22%) there is a practical safety concern. 2. The environmental impact to residents in the surrounding area will result in an increase of traffic, noise, pollution. The surrounding area and the surrounding villages is an important one. Thatcham is an urban town and the surrounding rural parishes with their own identities to keep their identities. As residents in the Cold Ash Parish we are keen to protect this for future generations. 3. Further evidence is required to clearly understand the true impact of a plan of this size will have on the surrounding area. The proposed housing number but at reduced numbers. Clarity around its impact is neither fully worked through or clearly defined. 4. There are continual changes to what is being proposed. 2500 dwellings, then 1250, then 1500, then potentially 2500 over the plan period. The required planning diligence, assessments, impact studies and processes must reflect a true picture of the development. 5. Facilities and services being proposed are not confirmed. The ability to support a development of this size must be based on confirmed commitments. Who will be paying for the ongoing support of these. 6. Healthcare, schooling, leisure facilities are all under extreme pressure. <p>- Reference. Policy SP17, in the Regulation 18 of the emerging draft local plan, stated expectation of an new 8FE service.</p>

	<ul style="list-style-type: none"> - Policy SP17 of the Regulation 19 Consultation then reduced this to provision to only land. - The Thatcham Strategic growth study indicated that planned strategic development at 6-8FE is likely necessary to - The size of land specified is below the minimum viable size for a secondary school. - Trinity and Kennet are currently at capacity. - The infrastructure Delivery plan of Jan 2024 only has figure of 5,027,613 which is not sufficient to fund a secondary - The Thatcham Growth study noted that education provision was based on WBDC data from a 2011 study. This is i <p>decisions on, which leads to a conclusion that there are significant areas of detail insufficiently assessed or adequat</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Collins, Tina
Consultee Full Name	Tina Collins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1115
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 12:46:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<ul style="list-style-type: none"> Increased traffic - The plan to have an exit and a carpark off of Hart hills seems dangerous on a already hazardous road. The road becomes dangerous during winter months and tends to have damaged due to frequent levels of traffic using it. The plan will make this worse, i don't understand how the WBC feels this is a safe option. destruction of wildlife habitat - It goes without saying that any development on green land is going to damage a lot of our wildlife. Any development would result in severe negative impact to all animal species. Education - i have strong concerns about the plan to provide an early years provision within the development. this will lead to the end of small rural Early Years settings. The Early Years sector is already in crisis and needs support. Large organisations, such as nurseries that are more likely to be what WBC are describing when they say 'Early Years' rarely deliver high quality education and have a historic statistic of having high turn-over of staff/leadership. We need to encourage settings and encouraging investment as smaller setting deliver the high quality and continuity that the young children need.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Barlow, Julia
Consultee Full Name	Mrs Julia Barlow
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS939
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am OBJECTING to the Thatcham NE Housing Development Plan for the following reasons;</p> <p>The information provided by the council regarding this development is in the form of a lengthy document which is not user friendly. Thankfully, our Parish Council has waded through a considerable amount of pages to help us understand the implications of this development.</p> <p>From the work undertaken by Bucklebury Parish Council on residents' behalf it is evident that the information provided in the Local Plan is vague using out-dated information ie the data used regarding the biodiversity of Bucklebury Common in 2018. 80% of surveys were conducted more than 15 years ago, 50% 20 years ago and 44% 30 years ago.</p> <p>Another example is that of the proposed 450 sq m primary healthcare facility with the suggestion that a GP Surgery be located on the site of Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, the Local Plan Review does not provide insight into strategic healthcare planning.</p> <p>I live in Bucklebury and want to let you know how this development will affect local residents. Initially, I didn't think we had assumed the traffic would be directed towards the A4 or along the bypass towards Newbury. However, this is not the information provided it will have a significant affect on the lives of all residents in Bucklebury, Chapel Row, Midgham, and the natural environment.</p> <p>Greenfield Site</p> <p>My main objection is that this is a greenfield site. New research from the CPRE says in rural West Berkshire, there are 1,000 hectares totalling 46.54 hectares, which it is claimed would allow building of 2,837 new homes without the need to build on agricultural land.</p> <p>When the housing numbers are no longer mandatory, and when there is already considerable potential for new homes in rural areas, it is clearly wrong for local councils in our county to be offering up vast swathes of countryside to developers, especially in areas of special landscapes such as AONB [Area of Outstanding Natural Beauty]," said Greg Wilkinson, chairman of CPRE Berkshire.</p> <p>The site of a former paper mill and farm in Colthrop has been proposed by developers as an alternative housing strategy. The overwhelming response from the public was very positive. A new road bridge over the railway and improved infrastructure would be considered considerably.</p> <p>The railway level crossing at Thatcham Station causes huge queues of traffic either side of the railway backing up to the station. The increased traffic created by the development, the queues will just be longer, especially during the rush hour. This will cause an increase of pollution from exhausts and tyres.</p> <p>Traffic Increase</p> <p>As mentioned above one of the main objections is the increase in traffic movements as a result of the new development. Two access roads from the estate, one leading directly on to Harts Hill Road, will mean a huge amount of additional traffic from the estate of Bucklebury, Chapel Row and Bradfield to get to the main road giving access to A4 (Reading), M4 (east and west) and the M3.</p> <p>As well as taking this direct route, traffic will use smaller lanes from this road down to the A4, travelling south towards the station through Cold Ash to travel north. The roads are narrow country lanes with many bends and no footpaths. The condition of the roads is at the least, with many potholes as water running/settling along the edge of the roads freezes and then causes the tarmac to crack.</p>

The villages are very quiet with little through traffic. The main route from Harts Hill Road consists of several acute bends. On this route, there are no pavements. Increased traffic will cause accidents with pedestrians, cyclists and horses. There are several accidents in this area and sadly, even with the current level of traffic several accidents involving cars and horses occur.

Directing traffic along this road will only add to pressure on existing accident blackspots. I.e. where Common Hill meets the junction of Back Lane and dual carriageway of A4.

There is no alternative to car travel. The regular but infrequent buses through the villages, having been totally stopped in this area, if you need to get somewhere you need a car. Very few people living in these areas use other alternatives to the car.

GP Surgery

Our local GP surgery in Chapel Row is already struggling to recruit and retain staff, combined with the increased population and new houses. It is impossible to get an appointment unless you phone in the morning and if you are lucky enough to get through to see a GP. If the surgery is forced to accept more patients it will negatively affect the existing patients and cause further delays. Injuries (Thatcham) and A&E.

Bucklebury Common

The plan mentions a 'Country Park' – this has a specific accepted definition which is not met in this Plan. The three proposed settlement boundary have no meaningful environmental value or commitment to exclude subsequent development. They do not provide adequate green space within the development itself and not rely on a link to the area of AONB to provide its value.

Bucklebury Common should be protected from increased footfall which will have an adverse effect upon the Common's diverse ecosystem that is nationally important. This consists of the famous Avenue of Oaks at Chapel Row, ancient woodland and one of the largest areas of heathland in Berkshire.

The Common has a rich variety of flora and fauna. Conservation of important habitats is undertaken by the Estate through its collaboration with various voluntary organisations. *The Bucklebury Heathland Group continues to work to restore the Common to once an extensive of heather and gorse, offering sanctuary to many birds and much wildlife.*

Already there are problems with anti-social behaviour such as groups of motorbike riders on the Common and 'doggerel' along the Common.

The local environment will be changed forever in a negative way. This is Greenfield development abutting an AONB. There is no strategy for positive impact and overall biodiversity gain.

I strongly urge you to reject this development and look at alternative sites that will not destroy this beautiful area for the future.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Mitchell, Lynne
Consultee Full Name	Dr Lynne Mitchell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS943
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I object to the North-East Thatcham development plan (SP17) with its proposal to build 1500 to 2500 houses in NE Thatcham as part of West Berkshire Council's Local Plan Review for the following reasons:</p> <p>Housing development should be focused on brownfield sites and those within urbanised areas wherever possible, not greenfield sites. The impact on the AONB, environment, the common, biodiversity, wildlife and local amenities of this development would be significant.</p> <p>The development would effectively join the distinct settlements of Thatcham and Upper Bucklebury.</p> <p>The development would also have a huge negative impact on the already overstretched provision of infrastructure and services (hospitals, GP surgeries, dental practices, pharmacies), education, public transport. These services are already stretched and cause anxiety and stress for those trying to use them. The roads through Upper Bucklebury would not be able to accommodate the increased traffic from West Berkshire Council. They would no longer be safe for non-motorised users, such as horse riders, walkers and cyclists, and the closure of rural roads.</p> <p>In 2007 Thatcham suffered very badly from pluvial flooding. All the proposed urbanisation of the suggested allocated sites would exacerbate the existing development at Thatcham, which will only exacerbate the existing flood risk situation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Evans, Michelle & Clive</p>
<p>Consultee Full Name</p>	<p>Michelle & Clive Evans</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS948
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I object to this plan on the basis that the infrastructure, particularly Harts Hill Road, is inadequate to deal with the increased traffic that would inevitably create. Not only is it inadequate but also dangerous, as the recent cold weather proved. This road is not only of a poor nature to nature of the road but also down to the continued water leaks from archaic piping. In addition there is already no safe

	using the stretch from The Mill House mini roundabout to the top of the hill at Upper Bucklebury. Potentially, with 2500 cars trying to find their way to A34 or M4. As the A4/A339 through Thatcham and Newbury down around the Har (especially at school run and other oak times) becomes overloaded they will inevitably use Harts Hill Road, Burdens down Red Shute Hill and on past Hillier's Garden Centre to reach the A34/M4. In doing this the likelihood of serious/fatal accidents and pedestrians (including secondary school children) who I often see walking this road, will be substantially increased. Knowing these very real and obvious increased risks, those approving would be culpable to any loss of life.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Baker, Francis
Consultee Full Name	Francis Baker
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS952
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	

<p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<ul style="list-style-type: none"> • By virtue of its scale, proximity and high visibility from several approaches to the AONB and the wider landscape, the proposed extension will have a significant harmful effect upon the setting, sense of remoteness, tranquility and character of the North Wessex Downs AONB, contrary to Policy SP2 of the WBLPR and Paragraph 172 of the NPPF. • The allocation is located on land forming part of the LCA WH4: Cold Ash Woodland and Heathland Mosaic Landscape, the West Berkshire Landscape Character Assessment and includes land within the designated AONB. Accordingly, the scale proposed will result in the unacceptable loss of land which is of high landscape value in its own right, contrary to Policy SP8 of the WBLPR and Paragraph 170 of the NPPF. • Paragraphs 1.26 and 2.24 of the Thatcham Growth Study (Stage 3) states that an objective of the Study is to avoid coalescence of settlements. However, the proposed development will significantly reduce the physical and perceptual separation between Thatcham and Upper Bucklebury and an unacceptable loss of separate identity, contrary to the objectives of the Study, the West Berkshire Landscape Character Assessment, WBLPR Policies SP2 and SP8 and Paragraph 172 of the NPPF. • The requirement for a network of green infrastructure linking Thatcham to the plateau and the AONB will result in additional pressures on the environmental, economic and social fabric of the AONB, its communities and rural way of life, contrary to the NPPF. • The proposed development will have an unacceptable impact on extensive areas of ancient woodland which adjoin the AONB, contrary to Policy SP11, Dc4 and DC14 and Paragraphs 170 and 175 of the NPPF. • The strategic site allocations at Sandlesford and North East Thatcham are expected to deliver approx. 1,250 dwellings, nearly 50% of the total supply of dwellings to be delivered on all allocated sites over the plan period (4,670 dwellings). Given the long lead-in times and the deliverability of both sites, I believe there is an undue reliance on them. This has considered the Councils ability to meet the housing needs of the area and maintain a 5 year housing supply over the plan period. These sites are a significant component of the urban focus of the Spatial Strategy and are major contributors to the clear imbalance between rural and urban areas which is not justified by evidence and will have unacceptable consequences for the AONB, particularly with regard to maintaining vibrant and balanced communities.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Carter Shaw, Robert
Consultee Full Name	Robert Carter Shaw
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS969
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to you to object to the plan imposing so many houses in a rural area that cannot supply the recreational doctors and schools and adequate road access to the development. Harts Hill already has dangerous access on corner Avenue already becomes very difficult when used as a rat run when other roads are blocked for road works and Bra impossible with so many cars parked on its main road. We are a very rural area which is simply not designed for this is a town. A scheme with this number of houses will swamp the whole area and the number of new residents will des Please review all its aspects and the consequences on the area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Southgate, Conor
Consultee Full Name	Conor Southgate
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1017
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to formally object to the North East Thatcham (NETD) housing development which has been approved by West Berkshire Council.</p> <p>I run a design and build construction company, building new homes in West London. I am unable to comprehend how a housing development can be proposed on a site between North East Thatcham and Upper Bucklebury.</p> <p>I have lived in Upper Bucklebury for 30 years and proposed scheme <u>will</u> destroy the protected AONB countryside to the north of the village boarder with. I have set out my reasoning for the above statement below;</p> <ul style="list-style-type: none"> • The A4 is already over congested at peak times and this will worsen traffic levels. How do cars sat backlogged on the single carriageway into Thatcham correspond with WBCs green policy for reducing emissions? • In turn more road users will cut through villages such as Upper Bucklebury & Chapel Rowe. These roads are not designed for the demand nor the speed at which motorists drive through villages with elderly care homes & young pedestrians. • The additional roundabout proposed on Harts hill as well as the carpark is not suitable for to this connection since it will increase in levels of traffic. • Road infrastructure is unsuitable to support traffic from an additional 1500 homes. Based on NETDs location, the impact on local highways. • I was a student at Kennet school and understand student numbers have continued to increase to 30+ students per class. Schools overall performance has suffered. This is not effective learning. Where do 1500 homes send children & how will this be overloading the teaching system? We do not have the local school infrastructure for this size of development. • Medical practices cannot support this number of additional residents in the area. Building a new practice on the edge of the village in 2036? Where will all the 1500 homes worth of residents be looked after prior to this? • There is no legitimate positive impact for the NETD presented in the design access statement. It offers a housing development placed in entirely the wrong location within WBC. Greenfield sites between Thatcham and Newbury would offer a more suitable additional housing as well as transport routes & the local amenities support the increase in population. • Sustainable drainage systems (SuDS) which are outlined in the plan will require enormous attenuation systems. These fields offer vital storage of storm water which otherwise runs off to Thatcham. I was at Kennet school in 2012 down Stoney Lane. Schemes such as this, regardless of permeable external and attenuation systems will destroy the landscape. The likelihood of the 1:100 year flooding, which is becoming evermore occurent with recent extreme weather. I have seen the developments of 9 homes - 1500 homes in this location is not suitable. <p>West Berkshires local plan notes; <i>'without a local plan, building new things in our community won't be done in a way that we get it right and work with you to shape West Berkshire until 2039'</i>. The aforementioned list would speak somewhat to these statements.</p> <p>This proposal benefits developers pockets & a housing quota for WBC, without the care or diligence to review the application for the benefits developers pockets. It must be reconsidered and properly reviewed. This should never have been approved.</p> <p>Please protect our home and reconsider the decision on this application.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heslop, Alexia
Consultee Full Name	Alexia Heslop
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1025
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>Please accept this communication as my objection to the Thatcham NE Development plan, to on the basis that it is unsound and see my reasons below:-</p> <p>A Bucklebury resident for over twenty five years, I have grown to love the surrounding woodlands. I am very fortunate to have access to it. I am greatly concerned that this beautiful area can only be enjoyed environmentally by the building of so many houses close by. Many thousands more people will move to the area, and will want to take advantage of the landscape. It is highly likely that the increase in housing will have a detrimental effect on the legally protected wildlife. This is in direct contrast with the management plan on the Common, focused on restoring and nurturing the ecosystems found around here. There is pollution, noise and other anti-social behaviour around us, which inevitably comes with an increase in population. This is detrimental to the rural environment.</p> <p>We are personally making efforts to educate our children to care for the countryside around us. We are also involved in Common Clearance or sticking to established paths on the Common during nesting season. We expect WBC to plan and act responsibly, from an environmental perspective, on our behalf.</p> <p>I understand that SP17 should have a positive impact on the environment with regard to the provision of new or community parks, but there's little information available on how these will be managed to protect the environment. I do hope that they will be managed.</p> <p>I also have concerns around the potential increase in traffic through Upper Bucklebury. The plan will naturally send more traffic up into the village, for those heading towards the M4 for junction 10. For the sake of all our children, we would not wish to see more traffic coming through.</p> <p>The element of the plan regarding Secondary Education Provision is very concerning. Bucklebury has a choice between the Downs School and Kennet School. Mine attend Kennet. With an additional 1000 children in the area Kennet would easily become oversubscribed in which case Bucklebury children could not get a place at Kennet School. The provision of a new Secondary School does not appear to be a priority. There is no information on when and where a new school would/could be built. In the interim there will be increased travel to The Downs School, which is quite a distance away. My understanding is that the basic strategy is dating back to 2011 and much more work needs to be done to understand the educational needs of the area and move forward.</p>

	<p>Finally, I am concerned about the timing on the Local Plan review consultation, following Mich 6th December 2022 which included amongst other things a focus on taking into account the assessing how much housing can be accommodated. This most certainly applies here. Surely the on planning, due to come in later this year must be used for the Local Plan.</p> <p>It is vital that we plan responsibly, and recognise that the decisions taken now affect generatio</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Weedon, Chris
<p>Consultee Full Name</p>	Chris Weedon
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1029
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	02/03/2023 19:24:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<p>As a resident of Upper Bucklebury since 1998 I object strongly to the proposed Local Plan. I b the reason set out below and will have an irreversible negative impact on the quality of life.</p> <p>Transport</p> <p>Access to/from the development will be via the A4 which is already gridlocked at peak times along Floral Way. Motorists commuting to Reading or the M4/A34 will inevitably seek an alte through Upper Bucklebury. Harts Hill has a number of sharp bends which have caused nume years and is especially dangerous in winter, even when gritted. The development will greatly Upper Bucklebury and pose an increased risk to villagers walking their children to school in t Peach's Stores. There is no pavement along Burden's Heath, which cars will use to head tow 13 of the M4.</p> <p>Healthcare</p>

The healthcare proposals contain only wishful thinking with no detail and an absence of concrete medical practices. There appears to have been no Health Impact Assessment. NHS England has closed GP practices, so the burden will fall on existing practices that are already overstretched. Bucklebury is a well-managed medical practice but it was stretched during the covid outbreak with delays in prescriptions and other services. An excess of new potential new patients will have a severe negative impact on the practice's ability to service its current list.

Environment

The Plan will have a severe negative impact on the footpaths and woodland in the proximity of Wimble's Wood lies on the edge of the development and is traversed by means of a narrow path encountered on each walk. The development will inevitably greatly increase footfall, widening the character of the area. Bucklebury Common similarly has many narrow paths which do not improve. The development will result in a significant increase in pollution – light, noise and emissions having a negative impact on the environment.

Strategic gap

Upper Bucklebury retains its separate identity from Thatcham solely because of the green street A4/Floral Way, providing a clear and distinct boundary between the two urban areas. If the development proceeds Upper Bucklebury will be irrevocably joined with Thatcham and will lose its identity. The rural nature of Upper Bucklebury will be destroyed.

Education

The Thatcham NE Development Plan, funded by the developers, was based on West Berkshire pupil yield from a study in 2011 and is therefore out of date. The same plan also notes that the site is not sufficient on its own to fill a 6-8 FE secondary school. Government guidelines state that less than 6FE are not sustainable. The developer funding does not cover the total cost of construction on the substantial running costs of the school. Much of the site is sloping and therefore unsuitable for a sports field, unless it is close to the A4.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thorpe, Anthony
Consultee Full Name	Anthony Thorpe
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1033
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to lodge my strong objection to this ill proposed development.</p> <p>This would have a significant and an irreversible negative impact on the existing communities, infrastructure and wild spaces.</p> <p>The planned infrastructure to support such a large development is not sufficient, and will put pressure on the police, roads and transport services, not to mention the water and waste services. I don't believe there has been sufficient impact assessment for the approval of such a development and the plan does not address, to an acceptable level, the additional demand on the existing infrastructure.</p> <p>Adding new schools does not address all the other infrastructure needs. I have not seen plans for a new train station nor how this additional load will be managed on an already high risk water and waste network. We have seen recent developments in Thatcham for doctor surgeries, with a move to transfer patients to the Chapel Row surgery making it impossible now.</p> <p>Building such a development of this size near an AONB and many other surrounding areas that are at risk of flooding will have a detrimental impact to the AONB and there is a flagrant disregard on conserving and enhancing the natural beauty of the area by providing easy access to roads going through Chapel Row village. This road is not designed to take this level of proposed traffic on roads with no footpaths. Currently Chapel Row caters for cyclist and horse riders; a quiet and idyllic village that you are destroying.</p> <p>You might meet your goal of introducing houses to hit your target of 9,775 homes for 2037 but in doing so you will be losing control for years to come.</p> <p>In recent years local objections to developments in the area have evidently been ignored, such as building on the Thatcham site too late to carry out more in-depth impact analysis and course correct, I implore you to do so.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Deighton, Marcia and Eddie
Consultee Full Name	Marcia and Eddie Deighton
Consultee Organisation	

Agent Full Name	
Agent Organisation	
Comment ID	PS1037
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	We are writing to object to the above vast ! planning for houses on proposed site We feel this would impact on, schools, medical facility's traffic ,vast areas of natural habitat. It would change the whole enviroment
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Armstrong Smyth, Norma
Consultee Full Name	Norma Armstrong Smyth
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1053
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 07:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to the plan as I find it unsound for the following reasons: 1. Increased traffic – I have lived on Harts Hill Road for more than 45 years during which time the road outside my house has changed from 'rat run'. Traffic from the A4 and Thatcham travels round dangerous bends and pathway gate at well beyond the legal limit. If the proposal to build 1500-2500 houses in NE Thatcham is allowed another 3000 vehicles could be parking along the road. There are no footpaths or street lights on Harts Hill Road and pedestrians are in great danger going to the village school hall. 2. Strategic gap between settlement – The proposed building of 1500-2500 houses in NE Thatcham could close what is the official strategic gap between Thatcham and Upper Bucklebury. Thatcham is a few hundred yards. This gap also includes a designated area of Outstanding National Beauty which must be maintained. 3. Lack of Services – Education: Schools in Thatcham and Upper Bucklebury will be unable to accommodate a large intake of pupils resulting in overcrowding. Health Doctors, dentists, opticians & chemists and all their supporting services are fully stretched with the current population. Thatcham development would be unsustainable. For the above reasons any development in NE Thatcham should be refused by the Government Planning Inspectorate.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Morris, Rosemary
Consultee Full Name	Rosemary Morris
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1071
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:43:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object most strongly about the proposed housing development along the A4 and up Harts Hill on the following reasons:</p> <p>The size of the proposed development would detrimental to the local area for the following reasons:</p> <ol style="list-style-type: none"> 1. Traffic congestion on the A4. 2. Consequent rat-running through the villages of Upper Bucklebury, Chapel Row, and Southend Bradfield, already a problem. 3. Lack of schooling and doctors' surgeries to cope with the extra population. 4. Destruction of the Common which increases every year, due to users not adhering to the rules. The increased population makes it more difficult and impact the wildlife.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cane, Rosalind
Consultee Full Name	Rosalind Cane
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1076
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	Letter
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 10:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I AM OBJECTING TO THIS PLAN</p> <p>Having lived and worked in Bucklebury since 1974 I feel the need to help protect this fragile part of the environment. Digging up chunks of countryside and destroying wildlife habitat as well as trees and hedgerows etc despite everything is ludicrous. Just because money is involved this can go ahead it seems. Vaguely saying there will be countryside enough when so much will be destroyed.</p> <p>Traffic that building this small town will generate on an already clogged up system on the A4 will be horrendous not people who will live there who lets face it will be gridlocked in. The roads in the surrounding villages which people v development goes ahead are mostly single track country roads with wild life walkers and cyclists and horse riders be using them to avoid the A4</p> <p>A Car Park on the top of Harts Hill Really . Has anybody from planning driven up and down there it will ba an accid</p> <p>Since I first came to live here traffic has increased and there are pot holes in the road all over because of it. The co now so goodness knows what the extra traffic will do.</p> <p>Water and Sewage its all so vague. Its almost lets build and see how that goes along with extra pressure on GPs S pollution and noise there won't be any wildlife left to enjoy.</p> <p>Its not a case of not in my back yard houses have to be built but our environment is equally important and I feel that enough pressure as it is and I think this is being bulldozed ahead with disregard to the effect it will have on the people Newbury included. I wonder how many of the people pushing this forward live in this area and if it will affect them in it seems.</p> <p>I don't know if anybody will read the emails and protests that have been sent in. I would hope so. But if this propos of Berkshire will be lost forever which will be a shame.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Littlechild, Laurence
Consultee Full Name	Laurence Littlechild
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1085
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to register my objections to the proposed development at Thatcham on the following grounds:</p> <ul style="list-style-type: none"> • Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area, its ancient woodland and heath. • Major greenfield development in AONB which will impair significantly the enjoyment of open countryside by the • Impact to legally protected wildlife with no details of how this will be handled in a meaningful way • No clarity on how the educational provision would be provided to support the increased demand and ensure that significantly disadvantaged by the lack of choice or availability. This goes through all year groups. • No evidence of clear plans to support the provision of sports fields • Traffic will be siphoned into Upper Bucklebury where significant additional volumes will impact the safety in the • Healthcare does not have suitably robust strategies provided that will show how the additional housing would be space the health of new residents and existing communities would be put at significant risk.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Brims, Julie
<p>Consultee Full Name</p>	Julie Brims
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1090
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to you to say that I object to the plan most vociferously and find it unsound.</p> <p>I am totally against extending Thatcham over more green fields when it has swallowed up too many already.</p> <p>Once again houses are planned to be built with empty promises of better infrastructure.</p> <p>The plan will lead to increased traffic through the villages and I object to the remodelling of Hart's Hill Road to accommodate the disruption it will cause to people who use the road every day.from Bucklebury.</p> <p>Another 1500 houses for an already overcrowded area of West Berkshire is completely the wrong thing to do within the area.</p> <p>More houses and a possible 4000 people will need doctors, schools and shops which haven't been properly planned for. The water and sewage systems in an already over stretched area. No proper account has been considered of the environmental impact of this development will do.</p>

	It is time to pause the plan and wait for updated planning guidance as it is not mandatory now to build X number of sensitive to and reflect local constraints and concerns.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1011
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the development. Detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for the infrastructure to be delivered, plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water to build up a detailed picture what is being built where, get confidence of when that development is going to start and what the requirements will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/</p>

[developers/larger-scale-developments/](#)

[planning-your-development/water-and-wastewater-capacity](#)

We recommend developers attach the information we provide to their planning applications so that the Council and Thames Water's water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. The Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The Developer should ensure what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to do so will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order that infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. The Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing of development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to do so will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order that infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge Drive, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water to the public sewer.

If this site in total is to produce 2500 homes, our comments remain the same.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water at a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Grincell, Sarah

Consultee Full Name	Sarah Grincell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1098
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes
* No

Please give reasons for your answer

Objection to West Berkshire Council Local Plan Review 2022-2039 Regulation 19 Consultation

I wish to register my ongoing objection to the proposals set out in the West Berkshire Council (WBC) Local Plan Review Draft (LPR). I consider that the approach taken by WBC in the preparation of the LPR is flawed, is in conflict with key Planning Policy Framework (NPPF), and as such, there are elements of the Plan that are unsound.

This submission follows on from my objections made to the previous draft of the LPR in February 2021. This raised a particular opposed Policy SP17 and the proposed development of the North Eastern Thatcham (NET).

Of great concern is the fact that my previous objection was not acknowledged in the WBC Consultation Statement (WBC CS) by my husband, >Personal Details Redacted< and his objection was acknowledged and given the reference lpr2035, although it is not listed in the WBCCS and the response provided by WBC is wholly inadequate as it fails to address appropriately, therefore I ask that my previous objections be acknowledged, and as it remains valid, I request that it is considered as set out below.

I have set out my further objections under the following headings:

- 1 Need for the Development;
- 2 Environmental Impacts;
- 3 Transport Impacts; and
- 4 Socio Economic Impacts.

Need for the Development

WBC has proposed revision of the number of homes for the NET development to approximately 1500 in the Plan period, a reduction from 2500 when in effect it is an increase in the Plan period from the previously stated 1250. The 1500 number is an approximate number and the supporting studies are still based on an eventual size of 2500 dwellings. The number has not changed and if there is a 40% reduction in housing numbers, I would expect that there should be commensurate reduction in allocation. It follows that the implication is that the remaining 1000 homes will come forward in the next Plan period. This is unacceptable.

LPR Policy SP1 suggests that *Thatcham will be a focus for regeneration, for new housing and for improved provision of services*. Investment in the centre of Thatcham is welcomed, but initiatives that have the support of the Town Council should be based on *that A new urban extension to the northeast of the town will provide a new residential neighbourhood with supporting services in accordance with Policy SP17*. There is no evidence provided that this urban extension will have any benefit for the town, but detract from the centre if new facilities are delivered within the SP17 development as proposed. SP1 continues that *to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements in a way that SP17 directly contradicts this ambition, with outward sprawl detracting from the town centre and generating unsustainable growth. The greatest detriment will be the effective merging of Thatcham with Upper Bucklebury destroying the character of both*

As I set out in my previous objection, I consider WBC should revisit its assessment of housing need. There are a significant number of sites that should be prioritised for development as opposed to the entirely greenfield development at NET. The allowance for housing is on its own admission very cautious and this should be higher, further removing the need for the NET allocation. The updated Land Availability Assessment (HELAA), published in January 2023, includes a large number of sites that have been identified which have been discounted. This does not provide a robust basis for the assessment of the housing need that underpins the LPR.

Paragraph 35 of the emerging draft of the NPPF states that Local Plans are 'sound' if they are Positively prepared – that is, they – at a minimum, seeks to meet the area's objectively assessed needs so far as possible, taking into account the policies in the NPPF. In particular reference is made to Paragraph 61 which states that the outcome of the standard method is an advisory housing requirement for the area... There may be exceptional circumstances relating to the particular characteristics of the area which justify an alternative approach to assessing housing need.

In December 2022, the Secretary of State (SoS) issued a Written Statement that effectively removed the need to maintain up-to-date Local Plans, removed top-down housing targets (particularly for Local Authorities with up-to-date Local Plans) and gave a two-year transition period for LAs in the final stages of preparing Local Plans. A number of other Local Authorities have been asked to revisit their Local Plans. WBC should do the same to allow time for it to review the LPR thoroughly and arrive at a sound and less damaging set of proposals.

Environmental Impacts

As I highlighted in my previous objection, if delivered, even in a reduced form, the proposed SP17 allocation would pose significant environmental threats which include:

- Permanent damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands which are of Common; and
- Developing on a large swathe of farmland and green space that will have a damaging effect on the broadland and the Wessex Downs AONB that will forever ruin the open countryside for the local communities; and
- Causing harmful impacts to legally protected wildlife known to be present on the site without appropriate mitigation.

WBC has clearly paid insufficient attention to these environmental impacts. Its suggestion that the provision of SAP17 and the provision of a community park will have a positive impact is clearly flawed. The reality is that SP17 will have a significant negative impact on the environment.

The LPR that a Sustainability Charter is required to establish how 'policy requirements will be achieved' (including the anticipated overall positive impact on environmental sustainability). WBC maintains that the Charter will be developed in strategy documents (including one on ecology). However, the strategy documents either do not exist or have not been made public for the Regulation 19 consultation.

Even at a capacity of 1500 homes the population of the new SP17 development would be around 4,000 people. This space needs which are unlikely to be provided for on site alone with the vague reference to a 'community park'. As those living there and those visiting them will inevitably be spill-over into adjacent areas.

The LPR acknowledges this stating that the intent for SP17 is to focus people into the AONB by suggesting that it will create a network which will *'take advantage of the landscape'* to *'facilitate connection to the AONB, and include leisure routes'* in direct contradiction with the management vision for Bucklebury Common which is explicitly focused on not increasing the number of ecosystems they are working to restore and nurture.

WBC's Sustainability Appraisal for the LPR accepts that SP17 will have a negative impact on environmental sustainability and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated. However, it does not state what this mitigation might be, and it is simply unacceptable to leave this to chance in the hands of the developers.

For the reasons outlined above, I consider that the LPR is in direct conflict with the NPPF and Paragraph 117 that state that planning decisions should contribute to and enhance the natural environment.

Transport Impacts

The NPPF at Paragraph 104 states that transport issues should be considered from the earliest stages of plan making and that: *'the potential impacts of development on transport networks can be addressed'*. In preparing the LPR, I consider that WBC has failed to meet this key requirement of the NPPF.

As I referred to in my previous objection the proposals included within Policy SP17 will generate significant amounts of traffic, particularly the case for vehicle movements on to the local highway network, including the narrow road that passes through Upper Bucklebury. WBC suggest that traffic from the NET development will be directed to the A4, it also acknowledges that there will be significant impacts on surrounding lower order roads such as Broad Lane passing through Upper Bucklebury. With a new population of circa 4,000 people, at least that number of new car movements on the road network and to suggest that this will not be the case in this local area is unrealistic. If this is the case, there will be the inevitable additional traffic created by those visiting or servicing the development.

The inclusion of the new junction proposed on Harts Hill linking the new development is a clear demonstration that it is not being diverted in that direction and onto a road that passes through Upper Bucklebury that is simply inappropriate for this level of traffic. The road is inadequate, without pavements and has the potential for serious accidents. Significant disruption from an increase in traffic, additional queuing through the village, which in turn will inevitably cause increases in air pollution, which will directly impact the quality of life of Upper Bucklebury.

I consider that the air quality assessment prepared by WBC fails to address this. Furthermore, the document is not up to date, it is based on the LPR running to 2037, not to 2039. This affects the traffic levels forecast for the end of the LPR period and the impact on the environment.

WBC's high level Transport Assessment that underpins the LPR states (Paragraph 3.26) that the modelling undertaken for the Harts Hill Road *suggests it will not cause problems*. However, these modelling results are not provided nor are any details of the assessment. The lack of certainty here is very worrying, so too is the lack of any detailed assessment of the significant impacts that the development will have on the road network and the lives of the existing residents of Upper Bucklebury.

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the LPR Plan contains a number of policies that are intended to address the impacts of SP17 against key Sustainability Objectives. Objective 4 is to *promote and maximise opportunities for all forms of safe and sustainable travel*. WBC concludes that the policy is likely to have a *Positive Impact on road safety as safe travel*. This assessment is flawed as the introduction of great volumes of additional traffic onto unsuitable local roads will have a significantly adverse impact on the quality of life of Upper Bucklebury.

The possible siting of a secondary school in the proposed NET development would result in a significant increase in traffic in the area. This has not been considered in the traffic plans and models in the LPR.

In addition to the challenges faced through Villages like Upper Bucklebury, there will inevitably be further congestion at the key junctions in the area. A major bottle neck currently is the crossing at Thatcham train station. There is nothing in the LPR that seeks to address this and so the proposed development of at least 1500 new homes and the significant additional traffic will exacerbate the problem.

WBC's failure to address this is a major failing and demonstrates its lack of understanding of the issues facing the residents of the surrounding Villages such as Upper Bucklebury which it would be aware of if it had engaged constructively with existing residents. It is an ill-conceived, unsustainable, and damaging proposal though through the form of Policy SP17.

Socio-economic impacts

Healthcare provision

The Policy SP17 proposes a 450 sqm primary healthcare facility but there is no clear proposal for how this will be integrated into the existing healthcare network. A major development such as that proposed by SP17 is likely to have a significant impact on the local community from the outset be informed by a detailed Health Impact Assessment (HIA) in accordance with the current guidance.

HIA should include detail how the proposals for development have been discussed with health service providers regarding care services and the development proposals should demonstrate how the conclusions of the HIA have been considered to ensure it can be appropriately accommodated and to ensure that an unacceptable impact on the health and wellbeing will not be permitted. I am not aware that such an HIA exists and the absence of such a key document is a key failing.

The proposed NET development is covered by three existing medical practice boundaries, Thatcham Medical Practice, Row surgery. All three practices are already overstretched. The two Thatcham doctors' surgeries run independently and lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. New residents of NET will create demand on GP services that the existing practices could not cope with. NHS England commissions few new GP practices there to be patient demand for improved services. There is a chronic shortage of shortage of GPs nationally and locally by the NHS Berkshire West Clinical Commissioning Group (CCG) that this position is even worse here than in other areas.

Now more than ever, GP practices need to create efficiencies and economies of scale to make general practice more sustainable, increase access and extend the range of services and primary healthcare professionals available on a single site. It would make no sense or geographic sense for an existing local GP practice to set up a branch surgery on the proposed new development associated with such a move.

It is also likely to be unviable for one of the existing GP practices to relocate even to an expanded practice in NET. This would displace the surgery away from its existing patients creating greater travel demands. It is therefore highly unlikely to be established or operated sustainably as part of the NET development.

A further healthcare issue is that the existing dental practices in Thatcham are unable to provide care for the whole population of patients needing to travel further afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, stated that 17.5% of patients were registered at a Thatcham dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence on local dental practices regarding the potential impact of increased patient numbers resulting from additional housing.

The proposal to include 450 sqm primary health facility within Policy SP17 appears to simply be a mathematical exercise of critical importance. The failure to prepare an appropriate HIA nor consult appropriately with the existing community in the area is a fundamental failing of the LPR and the proposed Policy SP17. The impact an additional 4000 plus new patients on the area has simply not been appropriately considered or mitigated for against a backdrop of an already struggling NHS.

Schools Provision

The NPPF (Paragraph 97) states that *'it is important that a sufficient choice of school places is available to meet the needs of communities.'* It is therefore incumbent on WBC to comply with these requirements of the NPPF.

However, the provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly set out in a coherent plan for how the children from the NET development will be educated. Without this provision, the provision of 4000 new residents to the area is both untenable and fails to comply with the requirements of the NPPF.

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 merely states that 'the provision for primary school education is also unclear and contradictory and there is no information provided on school entry requirements. Draft Policy SP17 suggests that a 2.5 FE primary school on site and sports infrastructure will be provided, but the only obligation on the developer is to provide the land and the build costs, which is some way from providing a school. The reality is that there is likely to be a significant funding gap which must question the deliverability of the proposal. Needs to be in place before a development is occupied and there is no evidence that this will be the case.

The LPR is again unclear, and contradictory on the provision of secondary schooling. Draft Policy SP17 suggests that the land to meet the impact of the development, but that the nature and cost of the mitigation will be informed by a feasibility study at applicants' expense, and prepared in collaboration with the Council and local stakeholders. There are no details of the study and hence no possibility of assessing its suitability. By leaving the confirmation of actual requirement for the provision of secondary schooling to a feasibility study in due course, WBC is failing in its duty to ensure that sufficient school places exist. This is a fundamental failing.

SP17 refers to the provision of sports fields within the NET development, but there is no obligation for this to be provided. The location of the facilities is not identified, and no funding is earmarked for the delivery of the facilities. The existing sports facilities in the area are limited and availability for local teams is limited. The introduction of an additional 4000 plus new residents will compound this issue. The school playing fields could also be available as public sports field but, not only is this questionable because of safety issues, it is the case that the secondary school is unlikely to be delivered and as such the playing fields will not be used.

Conclusion

For the reasons outlined above and as set out in my previous objection, I am opposed to several of the policies and proposals in Policy SP17 and the proposed NET development. I consider aspects of the LPR to conflict with the NPPF and as such I would like to take the opportunity afforded to it by the SoS to pause the LPR process and to review its approach.

I reserve the right to follow up on these objections should further information become available, and I wish to have the opportunity of a public inquiry that might be held to consider the LPR. In the meantime, I would be grateful if these objections could be taken into account and I would be informed of any further progress with the LPR.

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

* Yes * No	
Please give reasons for your answer	
4. Proposed Changes	As I set out in my previous objection, I consider WBC should revisit its assessment of housing need. There are a significant number of sites that should be prioritised for development as opposed to the entirely greenfield development at NET. The allowance for brownfield sites in the current admission is very cautious and this should be higher, further removing the need for the NET allocation. The updated Land Availability Assessment (HELAA), published in January 2023, includes a large number of sites that have been discounted which have been discounted. This does not provide a robust basis for the assessment of the housing need that underpins the current admission.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cole, Gerry
Consultee Full Name	Gerry Cole
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1114
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 07:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It completely distorts the area and will have a profound effect on the local communities as well as the wider area and local communities as well as the wider area..</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>develop a more distributed plan that would not totally distort this area of West Berkshire.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Evans, Alan and Ann
Consultee Full Name	Alan and Ann Evans
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1118
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to say that my wife and I are vehemently opposed to the NE Thatcham development for all the reasons already stated by many other residents in the Bucklebury area.</p> <p>Roads,Transport,Schools, Doctors, Light pollution, etc etc.Destruction of habitat and wildlife.</p> <p>Also there has been a lot of work to save Thatcham from more flooding. This development on the hill would help Ea turn into a floodplain with heavy rain so Trees are the best bet for this site.to help avoid any flooding in the future</p> <p>The maximum development should be kept to 10 and they would need to be fitted with solar panels and a Heat pump</p> <p>So this ridiculous proposal should not proceed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Croudace Ltd (Represented by Nexus Planning)
<p>Consultee Full Name</p>	George

	Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1532
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes
* No

Please give reasons for your answer

[For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]

Proposed New Allocations

The LPR proposes to allocate nine new sites for residential development to bring forward an estimated 1,720 units. Land for 80 units upon adoption of two respective Neighbourhood Plans.

North East Thattham Strategic Site (Policy SP17)

The largest of the proposed draft allocations is 'North East Thattham', identified to deliver 1,500 units across the plan period. Whilst Croudace generally supports the direction of a large amount of growth to Thattham, it does have ongoing concerns over the viability and developability of North East Thattham. On this basis, the Council should allocate smaller, unconstrained sites within the plan period without requiring much in the way of supporting infrastructure.

However, should the draft allocation at North East Thattham ultimately remain, Croudace considers that there is still a need to allocate additional sites around Thattham to alleviate some of the pressures on supply arising from elsewhere in the plan period. Sustainable sites such as Henwick Park, which are well placed in the short-term, and do not require any large scale infrastructure interventions to ensure delivery, are very well placed in the short-term, which is directly adjacent to the settlement boundary.

North East Thattham – Spatial Matters

Despite acknowledging that Thattham is a focus for strategic growth, the Council proposes to allocate one single site at North East Thattham which is identified for an urban extension to deliver approximately 1,500 dwellings across the plan period. Draft Policy SP17 requires the site to be delivered comprehensively along with key infrastructure including community uses, green infrastructure and transport infrastructure to meet standards of sustainability.

By way of context, the Regulation 18 stage LPR identified North East Thattham for the delivery of 2,500 dwellings across the plan period. As such, there has been a theoretical reduction of 1,000 dwellings. However, Croudace notes that the proposed allocation at North East Thattham (as shown on the draft Proposals Map and on page 65 of the LPR) has not been amended accordingly to match the reduction. Croudace considers that, as currently drawn, the amended settlement boundary for Thattham will also extend in a similar manner.

As such, Croudace objects to the extension of the settlement boundary in such a manner and considers that this could impact on the viability of the site brought forward at North East Thattham which is far in excess of the number of dwellings envisaged to be allocated to the site does deliver.

North East Thattham – Deliverability

Policy SP17 outlines the expectation that all 1,500 dwellings proposed to be allocated at North East Thattham will be delivered within the first five years of the plan period. The Council's Housing Trajectory (within the Housing Background Paper) illustrates that North East Thattham is not a 'deliverable' site in the first five years of the plan period. As such, it can be concluded not to be a 'deliverable' site in the first five years of the plan period. national policy.

Assuming that it is capable of being considered a 'developable' site, it is instead slated to deliver 150 units from a site in the first year of the plan period (8 of the LPR) and then in every subsequent year until 2038/39 (i.e. Year 17).

Croudace considers it unrealistic for the site to deliver 150 units in its first year given significant preliminary and enabling work, including key infrastructure, before construction of houses can begin. Whilst there is no indication as to how 150 units a year will be delivered (e.g. multiple sales outlets etc.), Croudace considers that the trajectory should be redrafted to show more realistic delivery rates for supporting items of key infrastructure.

Large strategic sites, including those allocated by the Council's Core Strategy at Sandleford Park, can often take many years to deliver dwellings and subsequently thereafter due to complex infrastructure requirements and delays with land assembly.

The Lichfields document 'From Start to Finish' (February 2020) suggests at figure 4 that for sites of 2,000+ dwellings the average build out rate for validation of first outline planning application to completions on site is 8.4 years. After that, the average build out rate for completions on site is 181 dpa.

Therefore, to achieve the delivery of 1,500 dwellings as assumed within the plan period, an outline planning application should be submitted in Spring 2022, allowing first completions in 2029/30. Clearly, an outline planning application has not been submitted and the trajectory set out by the Council is unlikely to be achievable. As such, the Council should take a precautionary approach and consider smaller scale allocations such as at Henwick Park.

For example, according to the 5YHLS Statement (November 2022), Sandleford Park has failed to deliver any completions within the first five years of the plan period. Core Strategy in 2012. Sandleford Park East was granted outline planning permission on appeal in May 2022 but no outline planning application has yet been submitted, while Sandleford Park West is subject to a longstanding outline planning application which remains outstanding since 2018. The Council has correctly not counted any units arising from Sandleford Park West in its 5YHLS up to 2028/29.

In common with the Sandleford Park site, draft Policy SP17 requires a 'comprehensive' form of development (i.e. a site which is developed in a way that ensures that the "provision of all infrastructure, services, open space and facilities will be timely and co-ordinated". Given the scale of the site, a scheme of this size, the Council may require a Supplementary Planning Document to guide development, thus adding to the time and cost of delivery whilst such a document is drafted.

Given the delays experienced with the comparable allocation at Sandleford Park, Croudace is concerned that the Council's strategy to deliver a combined 70% of the LPR's total allocations (and one large strategic site to deliver 80% of the LPR's new allocations) is not a 'justified' or 'effective' strategy. To the contrary, it is a high-risk strategy.

Croudace considers that the delivery issues at Sandleford Park clearly demonstrates the types of challenges that can be encountered on such a large scale. This should respectfully serve as a warning to the Council that a variety of allocations are required to meet the plan period.

The inability of North East Thattham to yield housing completions within the first seven years of the plan period has a significant impact on housing land supply for the Council, soon after plan adoption. Clearly therefore, the LPR should be allocating a range of smaller scale sites to provide greater flexibility and certainty. NPPF paragraph 68 is clear that planning policies should identify a sufficient number of sites and that authorities should identify a supply of specific, deliverable sites for years one to five of the plan period.

Paragraph 73 of the NPPF refers to the potential benefits of larger scale development but requires authorities to take account of the risks of lower rates of delivery, given the lead-in times for large scale sites.

	<p>If allocated for development, the Land at Henwick Park is a deliverable site which could deliver dwellings within the first five years of the plan period, as we demonstrate earlier within these representations.</p> <p><u>North East Thatcham – Affordable Housing</u></p> <p>Draft Policy SP17 expects North East Thatcham to deliver 40% affordable housing, potentially equating to 600 units of development. However, given it is unlikely to deliver housing until Year 8 of the plan period (i.e. 2029/30), this will also mean a significant proportion of vital affordable housing.</p> <p>Thatcham, as a result of its period of 'consolidation', has suffered from a lack of affordable housing in recent years and a meaningful delivery of affordable housing early in the plan period.</p> <p>The site at Henwick Park would deliver at least a policy compliant level of affordable housing (40%) and as set out a significant proportion of affordable units could be delivered within the first five years of the plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with pro
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Teal, Philip
Consultee Full Name	Philip Teal
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS975
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	01/03/2023 13:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I refer to the Local Plan Review to 2039 referred to in your e-mail to constituents received on 20 January 2023. In paragraph SP17 for the North East Thatcham Strategic Site proposing at least an additional 1500 homes.</p> <p>In recent weeks it has been widely reported that the number of houses to be built to 2039 had been reduced from 2500 as referred to above has the overall development area remaining unchanged from the December 2020 draft. This therefore Council has an intention at a later date to further increase the housing numbers on this site.</p> <p>However in view of the Secretary of State for Levelling UP, Housing and Communities statement on 6th December 2022 by Councils should now be considered as an advisory starting point and not mandatory one wonders why WBC is preventing Local Authorities have put theirs on hold until updated guidance is provided.</p> <p>Additionally WBC rejected plans for 500 homes at Seige Cross (now incorporated into the current scheme) in 2015 at Thatcham and erode the landscape between Thatcham and Upper Bucklebury and also detract from the landscape and also create clear and demonstrable damage to education provision in Thatcham. It is inconceivable that WBC should not have at least three times the size in the same locality.</p> <p>Notwithstanding the above I wish to register my objection to the current plan for the following reasons .</p>

- 1 Increased burden of traffic
- 2 Negative impact on the local environment
- 3 Negative impact on local healthcare
- 4 Negative impact on Education
- 5 Overload of statutory services

1 Traffic

Traffic on the surrounding road network is already heavy during peak periods and Harts Hill is regularly used as a route. Congestion regularly occurs on the A4. Long traffic queues regularly build up at the Harts Hill Road/Floral Way and Floral Way/A4 junction. The proposed development will further increase traffic congestion on the A4 through Thatcham towards Newbury and Reading. Traffic will also increase over the Thatcham railway crossing where vehicles now can regularly wait up to 20mins in order to cross the railway during trains.

The WBC transport assessment paragraph 3.31 states that the development will cause additional queuing at the railway gates open. However at rush hour the queues do not completely clear during trains so this modelling is clearly unsound. The proposed development on a brownfield site at Colthrop which includes a bridge over the railway has been discounted without comment in paragraph 4.20 stating that the Spatial Strategy seeks to make use of brownfield land.

It is also understood that a road junction to this development is proposed onto Harts Hill Road, paragraph 3.11 of the Transport Assessment Report, but there is no concept design included as to how this will be achieved. This junction will inevitably encourage rural routes via Harts Hill Road as opposed to the main trunk roads which will significantly increase the vehicular movements through the villages of Upper Bucklebury, Southend Bradfield and Cold Ash. Particular concerns must be raised regarding the road from Heath to Cold Ash, a road along which is little more than a country lane with no footpaths. This road is wholly unsuitable for heavy traffic and will cause additional safety fears for parents whose pupils attend St Finians Primary School.

SP17 suggests that these new junctions will not cause traffic problems but no modelling has been provided to prove this.

Harts Hill Road can be particularly hazardous during winter months with icy conditions despite salting by the Council and a significant increase in vehicle movements as a result of this proposed development.

Additionally the proposal for a potential car park located on the most dangerous part of Harts Hill Road due to a series of bends could cause a serious hazard with the potential for serious injury and no proposals have been provided to mitigate this.

2 Environment

The site is known to contain several protected species, bats, newts, badgers and ponds with breeding dragonflies and butterflies. The development would have a positive impact on the environment and will achieve the legal requirement for biodiversity net gains. However the assessment provides no evidence on how this will be achieved and also no evidence that a base line on which the 10% net gains required by the Environment Act can be measured. The site is a green field site and therefore there is every reason to believe that this development will have a negative impact on the environment. SP17 makes the assumption that this negative impact can be mitigated during the development.

The indicative site plan for the site indicates two significant features.

- 1 Community Park open space
- 2 Potential car park off Harts Hill.

The Country Parks are located at the top of the slope nearest to the settlement boundary of Upper Bucklebury which the assessment states that it is intended to provide a network of green infrastructure which will include a new strategic community park with greenways to facilitate connection to the AONB including leisure routes accessible to all users. This takes no account of Upper Bucklebury Common which focuses on not increasing pressure on the fragile ecosystems that they are trying to restore.

The proposal to incorporate a car park on Harts Hill Road close to the settlement boundary of Upper Bucklebury will be in close proximity to the community park and together with the proposed leisure routes would inevitably encourage a significant increase in footfall causing irreversible damage. This car park could also attract fly tipping which is already an issue in other car parking areas.

West Berks Council planning has always previously maintained strategic gaps between communities and Floral Way between Thatcham and Upper Bucklebury. Any breach of that gap has been a reason to previously refuse planning permission. The proposed development virtually eliminates that strategic gap but will effectively destroy the unique character of Upper Bucklebury that the Council has designated as a conservation area.

3 Healthcare

The area surrounding of this proposed development is served by three G.P. practices. Thatcham Medical Centre (TMC) and Thatcham Road Surgery all of which are over subscribed with existing patients finding it more and more difficult to obtain suitable appointments. The two Thatcham surgeries, TMC and Burdwood have an average of over 2000 patients per G.P.

It is anticipated that this development will have a population of 4000 - 5000 people and SP17 states that a 450sqm GP surgery would be wholly inadequate as a stand alone practice assuming GP's could be found as the health care service quicker than new ones can be recruited.

In addition to the SP17 development WBC have already approved the building of a further 91 homes within the catchment area further increasing the number of potential patients by an estimated 300-400.

There are also serious problems in obtaining dental care as there are no NHS dentists in the Thatcham area accepting private patients. Patients have to travel further afield even to find a private dentist. There is no provision made in SP17 for additional dental services.

This is wholly unsustainable and shows that the proposals for providing additional healthcare to support these new developments are not viable.

4 Education

Early Years

There is no information in either SP17 or the West Berks strategic growth study concerning early years education. A development with 40% affordable housing it is likely that there will be significant demand for nursery and infant schooling. The Growth Study indicates that the nearest primary school, Francis Bailey, is already working above its design capacity of 570 pupils. A new school will need to be constructed before any housing are occupied.

Secondary Education

Thatcham secondary schools are also operating at approaching or exceeding their design capacity and the proposed new secondary school catchment area of Kennet School in Stoney Lane for which the latest available data shows that it is currently at capacity. SP17 states that land will be provided to meet the impact of the development with the nature and cost of the land of feasibility study, however the Local Plan Review provides no information as to where such a school will be located. The plan provides with 50% of the funding provided by the developers. Para. 5.22 of the Strategic growth plan states any new school will be a future expansion but 5.19 states that a new secondary school is not considered feasible if small than 6FE. This is the case for the proposed school.

Pupils in Upper Bucklebury live in the catchment area of Kennet School (2miles) and The Downs school in Compton. Kennet School is oversubscribed then those living nearer the school will be given preference. Pupils living on the new development will be at Kennet over those from Upper Bucklebury leaving them restricted to The Downs which is 7 miles farther away. It is noted that The Downs has already more pupils attending than its design capacity. (see latest data from 'Get-Information-schools.se

SP17 gives no indication when new schools will be built but it would not be economic to provide additional school places. A new school will be required. The West Berks strategic growth study 5.18 - 5.22 provides no indication as to how additional school places can be provided. A new school can become economically viable and therefore the study must be considered incomplete and unsound.

Services

Drainage Systems

Foul Drainage

A development of this magnitude will put significant pressure on the existing foul drainage system. 1500 homes will be added and with the average foul discharge per person per day being about 150litres, this would represent a minimum of 60000 litres per day.

The West Berks Water Cycle Study final report dated September 2021 states that Chieveley, Hungerford and Newbury were predicted to or were exceeding their flow permit and that further developments in these catchments could lead to significant environmental damage.

It is the Newbury treatment works in Lower Way, Thatcham that will be serving this proposed development but there is already a significant load in the Newbury area confirmed which will cause even additional load totalling another 1000+ homes.

Thames Water have already had issues with the current sewage system on the A4 with discharges into the river Kennet. The existing foul drainage systems do not have the capacity to accept future loading without major upgrades. This is confirmed in the report para 5.3.1 showing the network on red alert and reporting that any upgrade would take 12-24 months to complete.

It is clear from the Local Plan Review paragraph 10.71 that no discussions have been held with Thames Water to ensure that the demand for water treatment will be achieved even though additional housing beyond the NE Thatcham Site has already been approved.

Storm Drainage

The proposed 170 hectare site is currently farmland sloping towards Floral Way and the A4 and as such this land does not contribute much of this water helping to prevent the overloading of existing storm drainage systems. The Thatcham Flood Alleviation Scheme lies to the South and West of this site and therefore unlikely to fall within the catchment area of the majority of the Newbury area.

the storm waters generated by this scheme, from building roofs, roads and hardstanding gulleys etc will need to be connected to the sewer system.

With the effects of global warming, the rainfall in the Thatcham area has been recorded as significantly increased in recent years and this can only increase further in the coming years and yet when the existing drainage systems were designed many years ago the current change in climate would not have been contemplated. The quantity of additional rainwater from this development will serve to surcharge the existing system to such an extent so as to significantly reduce the benefits of the recently completed system and therefore existing pipework may well need to be upgraded.

In older parts of Newbury storm and foul waters are combined which feed into the Lower Way sewage works but with the proposed development to put even greater pressure on the treatment works and the increasing likelihood of polluting discharges into the local watercourse.

It is inevitable that the drainage infrastructure will need be upgraded prior to any development being occupied, this will cause significant disruption to the people of Thatcham and surrounding areas for many months. Once again the consequences of the proposals have not been properly thought through and mitigated and therefore the proposals have been shown to be unsound.

Water

-
The West Berkshire Water Cycle Study Phase 2 final report dated September 2021 states that West Berkshire is experiencing an increase in water demand due to growth can cause the hydraulic capacity of the existing supply infrastructure to be exceeded to manifest itself as low water pressure at peak times it is also stated that the Water Resource Management Plans are required to be updated in line with plans by WBC.

It is not accurate to say that there is no predicted supply deficit as with our summers becoming hotter and drier due to climate change for river extraction due to lowering of the water table requiring the increasing possibilities of hosepipe bans. It is a fact that there were several weeks during 2022 as a result of over extraction of water as a means of preserving supply.

Upper Bucklebury relies on potable water supplies being pumped from the pumping station at the bottom of Harts Hill and the proposed NE Thatcham Development and it is of great concern that as additional housing become occupied there will be a significant impact to the village.

Electricity

-
The Scottish and Southern Electricity Networks Engineering Justification Paper states that the Thatcham Bulk Supply Point (BSP) Bramley BSP and predicts that by 2027 there will be an anticipated increase in peak demand in Thatcham of 40.9MW.

It also states that in the event of an outage and the need to restore power within 3hours network capacity for demand at the minimum demand at Thatcham and therefore network reinforcement is required.

SP17 makes no mention of anticipated electrical demand or whether consultations have been held with the statutory bodies and supplies will not be compromised.

Upper Bucklebury's water supply is heavily dependant on security of power feeding the Harts Hill Road pumping station and that a significant increase in demands of the Thatcham network will cause outage issues for the residents of the Village.

In Conclusion

-
In view of my comments above I therefore wish to register my strongest objection to the proposals by West Berks Council for a minimum of 1500 homes at NE Thatcham

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bird, Maria
Consultee Full Name	Maria Bird
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS864
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to the proposed development to build 1500-2500 new homes in NE Thatcham. I have lived on the outskirts of this development for 21 years and my family, neighbours and local villagers have all h and beautiful wildlife around us. We have been privileged and know and respect the land around us. This developme an adverse impact: including traffic, wildlife, flood risk, lack of amenities for things such as healthcare and schooling. In the time we have lived here have faced one flood and flood risks on more than one occasion the flooding was due the area of proposed development. Ditches and drains on the A4 have been maintained once in the 21 years we hav immediate reaction to the floods in 2007. We fear that this development will just exacerbate the flood risk problem or We believe that the development has not looked at the impact on the wildlife of the area, including Badgers, Hares, f and insects.</p> <p>It seems that the availability of Health Care has not been considered nor has the supply of spaces for both secondar residence of the development been taken into consideration.</p> <p>Traffic in the 21 years of living here has become a problem in just leaving and entering our home just off the A4 durin amount of traffic but also the speed at which the traffic is allowed to travel. In recent years the back up of traffic enter The Coach and Horses on the A4 and possibly further on some days. What will this development create in terms of t back lanes which already are used as rat runs to major roads. One big area of backlog being the railway crossing at area of major problem during the peak times weekdays.</p> <p>None of these issues seem to have been accounted for.</p> <p>In addition, where is the development of environmentally sound houses with greener energy sources in this day and developments that include green energy stations such as wind turbines, solar and ground or air source heating and qu Too many developments are going up built to substandard quality - could we see some greener approaches to hous Thankyou for your time to consider our objection to what we believe is an unsound development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hultmark, Torbjorn
Consultee Full Name	Mr Torbjorn Hultmark
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1124
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object to the WBC proposal for 1500 new houses around Newbury Thatcham. I live in Upper Bucklebury, and beauty on the edge of an AONB. The development, if built, will have a severely negative effect on the natural environment. The proposal is unsound.</p> <p>Traffic: The road running through Upper Bucklebury is already very busy and has become much busier since the development of Harts Hill. The increased volume of traffic from the proposed exit at the north of the site onto Harts Hill, is very a serious concern. The road is inadequate for a huge volume of traffic and, as it is already, dangerous for walking and cycling, so with an increase in traffic from new development even though the site may possibly have 'safe travel' within itself, the roads funnelling in and out will cause pollution both in respects of light and air. There is also a proposed car park on Harts Hill, something that can only cause further disturbance to the road as well as further disturbance for wildlife due to dog walkers and others coming into the area.</p> <p>Healthcare: The Northeast Thatcham development plan SP17 is bereft of detail or insight into the strategic health care planning. As public and private stakeholders respectively, appear to have arranged or published a prospective Health Impact Assessment on the northeast side of the development. All proposals for a major development that is obviously likely to have a significant impact on the area and location should be accompanied by a fit for purpose HIA in accordance with the current guidance for public-health impact assessment. Reference to how the proposals for development have been discussed with health service providers regarding impact assessment. Development proposal should demonstrate how the conclusion of the HIA have been considered in the design of the development. The impact of health and well-being of existing new communities will not be permitted.</p> <p>A multi – agency approach is required for tackling health and well-being. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading West Berkshire and Wokingham Health and Wellbeing boards together with the local authority in partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to address the requirements associated with a new development. It is a great concern that there appears to have been no direct engagement with the Thatcham development consortium and local general practices.</p> <p>There are 3 over stretched GP surgeries which at present cover the area of the proposed NE Thatcham development. Each of their combined lists include about 27,800 patients which really means just under 2000 patients per GP. As more people moving into a housing developments tend to make a greater demand on GP services. This is because there are more people requiring maternity care. Pharmacy closes in Thatcham have put further pressure on healthcare practices.</p> <p>There has been no approach by WBC all the developers to any local GP practice to discuss an appropriate site, floor space or more practice could relocate in the event of the housing development being built. An enlarged primary healthcare service located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham development serves the needs of the population. This would be likely to be supported by Thatcham town council but has not been suggested in the development options. Local practices did not have an input with inadequate 450 m² floor side proposal which they only discovered in 2022, appendix D.</p> <p>In respect of Health Care-Proposals for a major development that is likely to have a significant health being impact in the area should be accompanied by a fit for purpose health impact assessment in accordance with the current guidance from the Department of Health. Reference to how the proposals for development have been discussed with health service providers regarding healthcare services. The development proposal should demonstrate how the conclusions of the HIA having been considered in the design of the development because an unacceptable impact on the wealth health and well-being of existing new communities will not be permitted. WBC nor the developers as public and private stakeholders respectively appear to have arranged or published by the proposed north-eastern development.</p> <p>The three GP practices -which would cover the North East Thatcham development site already overstretched. These are the West of Harts Hill Road, Burdwood Surgery east of Harts Hill Road and Chapel Row surgery.</p> <p>Thatcham doctor's Surgery are run independently of each other in the combined list includes around 27,800 patients per GP. Newly registered patient moving to make a greater demand on GP services, therefore how will this development be managed?</p> <p>WBC and the developers have not made provision to mitigate the new burden of 1,500 or more houses-They have not made provision of a viable primary care medical facility.</p> <p>Dental care: There is no evidence provided that either West Berkshire council or the developers have approached any local dental practices regarding the impact of increased workload resulting from additional housing. As it is now Thatcham dental practices are unable to cope with the population.</p> <p>Schools provision: Provision for education for nursery through infant secondary education is not clearly defined within the local plan. The end to end plan: this therefore breaches the councils obligations to provide education facilities for children. Without this provision housing development is untenable.</p>

	<p>The lack of a coherent plan on schools provision across the various proposed developments also means that it is impacted on traffic. The sighting of a secondary school to the north-east of touching would result in significant increase in area, not considered in the traffic plans and models in the LPR.</p> <p>Policy SP1 7NE Thatcham strategic site allocation states that the site will provide early years provision – what are the implications?</p> <p>I cannot see any clear vision for proper funding or School Place provision -schools need to be available before houses are built, incomplete and contradictory on the provision of secondary school in and around Thatcham. The latest LPR is in contradiction with the documentation. It proposes that the sum of 15 million be contributed by the developers to secondary education. The cost of the land to be provided and hence no possibility of assessing at suitability.</p> <p>It is clear that the plan for secondary school provision is unsound:</p> <p>There is no such a satisfactory evidence of the number of pupils the school is to cater for, the location of school is not defined but it is noted to anything less than 6FE school is unsustainable, the timing of the funding is not clear and the proposed funding is sufficient to meet the Council's obligations to provide education.</p> <p>Environment:</p> <p>The green spaces surrounding Thatcham and the local villages, Upper Bucklebury, Midham, Cold Ash, contain a bio-diverse area if built over by thousands of houses. This area is home to hares, buzzards, kites, stonechats, nightingales, thrushes, nightingales, slow worms, meadow grasshoppers, woodlarks, dark bush-crickets, adders and all manner of protected fauna - all species at risk of annihilation. The nightjars fly to Bucklebury Common every June from Africa and mate undisturbed in the local fields. Many species, for one, will be under threat.</p> <p>The LPR's Sustainability Appraisal accepts that SP17 will, by building on a greenfield site inevitably have a negative impact but there is no detail on any mitigation for this impact. There are plans for community parks but they won't be safe havens for additional 1000s in footfall, noise, litter, light pollution, dog walkers, cats ...the negative impact is endless and permanent.</p> <p>To Conclude:</p> <p>Siting a major greenfield development in this area of biodiverse treasure will cause irredeemable damage to the environment. The biodiversity will be lost forever.</p> <p>This proposed development must not be allowed to go ahead.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Tocher, Caroline
<p>Consultee Full Name</p>	Mrs Caroline Tocher
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS1043
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I live in Midgham, currently a lovely, quiet rural spot, which the current plan has suggested should have 20 of its acres. This is so inappropriate and makes a mockery of the plans suggestion that 'outside of settlement boundaries, land where development will be more restricted.'

	<p>The suggested development of 1500 on the northeast of Thatcham, and the west of Midgham, is still wholly inappropriate despite the changes to the original plan. It abuts Cox's lane, which is a single track road leading into Midgham which through Midgham unnecessarily, thereby helping to retain it's rural character. Already yards of hedgerow have been removed and someone doesn't think a consultation process is necessary. Are we to be led to believe that Cox's lane won't be ripped up and that will result from this development better access? Midgham will be unrecognisable if this is the case.</p> <p>Previously, there had been suggestions of an alternative development south of the railway station in Thatcham. This would have included an awaited bridge over the railway, and also on the grounds that it would increase traffic on the roads in what West Berkshire Council only presume no one making these decisions lives in Thatcham. The queues through the town waiting for the railway to cross that route remains the most sensible to get from Thatcham to Basingstoke. This road is far less rural, and far more a road.</p> <p>Any large scale development of Thatcham necessitates an update of Thatcham's services, and yet this plan is found to be in large swathes of the day, and at all hours if the M4 is shut. Thatcham has previously been highlighted for needing further attention before any new major developments are made, and yet this plan ignores existing Thatcham entirely.</p> <p>I understand the need to build new houses but the doggedness with which West Berkshire Council are pursuing this plan and the reasonable argument is concerning.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bailey, Mark
<p>Consultee Full Name</p>	Mark Bailey
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1074
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Regarding the above plan, I would like to lodge my objection to this wholly unsound development for the following reasons: 1. Provision of healthcare Currently, all GP surgeries in the Thatcham and Bucklebury Parish areas are heavily oversubscribed and there appears to be no plan to address this within the proposal. You are risking the long term health and well-being of all existing local and potential future residents in the developed plan. 2. Education The lack of planning for healthcare provision mirrors that of education. There are no clear plans for the provision of primary schools to meet the obvious future demand that comes with an additional 2500 homes. The existing schools are already oversubscribed and this will simply exacerbate the current poor education choices provided to parents by West Berkshire Council.

	<p>3. Environment</p> <p>The proposed development will be enormously damaging to the environment and in your own LPR you accept that S on the environmental sustainability. You accept that this will potentially need to be mitigated but provide no clear plan. Given that WBC declared a climate emergency in July 2019, this development would appear to be significantly at odds with aims.</p> <p>Vague references to 'community parks' within the proposal do not provide any reassurance that there won't be mass existing AONB.</p> <p>4. Transport</p> <p>The existing road network in and around Thatcham and Upper Bucklebury is wholly insufficient to cope with the mass result from so many new homes. The council's previous failures at mitigating road and car usage in the Dunstan Park and the same mistakes will be repeated here with a totally inappropriate and unsafe level of traffic through Harts Hill. In the SP17 plan, the council's assessment is that the development will have a positive impact on the opportunities for transport. There is absolutely no evidence of this whatsoever. Glib statements along the lines of 'the development sh mind' do not result in actual action being taken. Where are the cycle paths segregated from the road network? Where routes? Like the rest of the local area, the car will inevitably represent the only reasonable and safe way to travel and emissions as well as make existing poor pedestrian provision even more unsafe.</p> <p>In general terms, I do not understand how an enormous development such as this can be recommended by WBC when available.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Fenn, Prue
<p>Consultee Full Name</p>	Prue Fenn
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS807
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>With regard to the above application I am deeply against it and object strongly to it as I find it completely unsound.</p> <p>The impact on the environment with such increased levels of traffic will be hugely detrimental, as will so many extra of such an increase of traffic on the A4, which is already seriously busy.</p> <p>It will also cause greater problems with the various roads accessing the A4 in the immediate area, which already face With greater queues, which again will effect the environment badly.</p> <p>Regarding healthcare all local practices are overstretched, there is a shortage of people applying to work in healthcare burden on the local practices which are already struggling.</p>

	<p>There appears to be no evidence to support claims that SP17 will have a positive effect on the environment. Neither can we investigate and analyse the severe consequences of building so many houses on a greenfield site. It will affect the local environment and we are so lucky to enjoy. Lapwings are one example, their numbers are now increasing but with the proposed building and all the proposed upheaval will drive them out of the area.</p> <p>The provision for extra schools to meet the anticipated demand is too vague and the amount of funding inadequate.</p> <p>Consequently I believe that WBC should halt proceedings.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Maclean, Duncan
Consultee Full Name	Duncan Maclean
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS932
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:46:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<p>I am sending this email message to register my objection to the proposed Thatcham NE Development.</p> <p>My reasons for doing so are as follows:</p> <p>- I have lived to Chapel Row for over 30 years and through traffic has increased massively during this time. The scale will lead to a further huge increase which is unsustainable on our rural road network. There are few pavements and walls ever more dangerous.</p> <p>- Our local surgery is already working beyond capacity and this development has no substantive proposals to deal with additional population.</p> <p>Please take my objections into consideration in your further decision making on this proposal.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Fenston, Elizabeth
Consultee Full Name	Ms Elizabeth Fenston
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS983
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 11:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am opposed to the proposal to build 1500 - 2000 houses in North East Thattham. The development is much too large for the area. It will be situated on the edge of an Area of Outstanding Natural Beauty to the north side of the A4. The A4 is a narrow and historically difficult to cross so it follows that almost all the extra traffic and footfall is likely to occur on the north side of the A4. There has already been considerable development around Thattham which has been absorbed into the country environment but the surrounding countryside and ANOB.</p> <p>The infrastructure, including schools and hospitals, is currently overstretched therefore the large increase in numbers of the local amenities. We have virtually no public transport so the increase in traffic, with every house having at least one car, will clog the already crowded country roads.</p> <p>Car park facilities are almost non-existent and the proposals will yet again draw all the traffic and footfall to the north of the site with an exit to the north of the site onto Harts Hill, pushing yet more traffic into the countryside and adjoining ANOB.</p> <p>This is a rural area and proud of it and this development is totally inappropriate and far far too big.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincent's Lane (Represented by TOWN)
Consultee Full Name	Pincent's Lane
Consultee Organisation	Pincent's Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1360
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincent's Lane) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The delivery of housing at NE Thatcham faces an even longer timescale to delivery than Sandleford Park. A strategic planning application was submitted by the landowners in February 2022. Following adoption of the LPR, an outline application would have to be submitted, considered and determined. This would be the case as at Sandleford Park in relation to reserved matters application(s); discharge of pre-commencement conditions and other matters. One national study (Footnote 6 - Sutton Coldfield Green Belt sites phase 2 report 2014) found that the average period from validation of first planning application to delivery of first homes is nine years. This study also quoted which would suggest a period of 7.7 years from validation of first planning application to delivery of first homes. Given these factors, it seems inconceivable that the allocation at NE Thatcham could be delivered within the timescale of the prudent allocation, based on the national studies quoted, would be 1,000 units within the plan period, which could be delivered within the plan period.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Powell, Katie

Consultee Full Name	Ms Katie Powell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS766
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF.

* Yes

* No

Please give reasons for your answer

With this letter I am voicing my concerns and objections to the proposed development of approx. 2500 home in Northampton. I plan to be unsound, not carefully thought out and potentially detrimental to Thatcham and all the surrounding villages. This area is already 'full' from the point of view of traffic, amenities, schools, healthcare provision. It is also an area that is rural in Berkshire, because for the time being, that is what it is. It would appear that is not to last. 'Rural' suggests looking after the environment and biodiversity of the area, none of which seems to have been taken into account with this very large development. It is a town, with the population of Hungerford into an area much smaller than Hungerford with none of the space, amenities and greenery. It is a rural area, rid of some very important countryside at a time when we are supposed to be protecting our natural world. Very strange.

I do totally understand the need for development and the requirement for more housing throughout the country, but I do not think that as many as 2500 in Thatcham, especially as it has been seen that we no longer need to meet the numbers set by the Government. But actually this is not in Thatcham at all, it is to the North East - almost like a separate town and the people living there are not in the town at all, most of them would be taking a car to drive there and park...well, where would they all park? So, the planning meetings who said that Thatcham was in need of regeneration and improvement has clearly not looked closely at the area. It seems to be an allocation out of all proportion in an area where so much of the land is taken up by AONB and flood plain. What are they for? The people wouldn't be a part of Thatcham and would need their cars to get anyway, maybe the houses are intended for commuters. Covid, the pattern of working has changed, and there are not so many people requiring to commute to London. Why are they purchasing houses in what was considered 'Commuter belt' at 'Commuter belt' prices, when they can choose to live so close to home. Should the number of houses not be reviewed in this very changed world? Also, with the birth rate dropping and the population of all classes in some year groups, will we see half empty classrooms in the proposed new school(s)? And when this is completed, how many can be built? Thus not fulfilling the promise made by the Property Developers.

I really believe that the effects of this proposal are devastating for the town of Thatcham. I can only see this as destruction and improving it. But I am also very concerned from the point of view of the villages to the North of this development. The development will have on the roads, education, environment, healthcare and general quality of life. I imagine many of the people concerned about the same aspects from their point of view. It affects everyone. Looking from the aspect of the villages, the negative impact this development will have on Upper Bucklebury. Whichever way you look at it, with the development of Upper Bucklebury will all but merge with Thatcham, separated only by a small copse at the end of Long Grove, and there will be a road to, from and through the village. This cannot be a good thing for the identity of our village and for the peace, tranquillity and beauty of all the reasons that people choose to come and live in a village.

There are so many sides to my concerns that it is hard to know where to start and this would be a document of many pages. I will mention them all, so I will concentrate on the main ones of traffic, environment and amenities. All amenities will be affected, but especially education and healthcare.

Traffic

I live in Upper Bucklebury and work in Thatcham. As I drive out of my road in Upper Bucklebury, it can take me a while to get out of the traffic, especially if there is an issue with a water leak, or roadworks or other disruption on Harts Hill - this is a choice. I can go along the Ridge towards Cold Ash, where I get caught up in a long stream of cars filtering one by one. I can then wait at the junction at Cold Ash for a space in the stream of cars; or I can go down Harts Hill where I get caught up in a stream of cars that slows down the stream of traffic or I get held up due to a water leak or yet another accident- one frosty day there were several accidents in the morning; my other choice is to wind through the narrow country roads and drive down the single track in Cox's Lane where I can allow other vehicles to pass. Now, I am wondering how this picture will look if we add potentially over 1,000 vehicles to the road. That is a conservative estimation, because with 2,500 houses, there could easily be 5,000 vehicles and if the M4 or A4300 or Floral Way has works on it, many of those vehicles will be taking those routes. What a nightmare and how dangerous. When Harts Hill was closed for several weeks, the impatience caused and the dangerous driving in the country roads resulted in a number of accidents. This same story could be written by anyone living in Cold Ash, Upper Bucklebury, Chapel Row, Southend Bradfield, etc.

Apart from getting to work, I am also wondering about the effect of so many more vehicles at the level crossing in Thatcham. I will wait in a long line of traffic for upwards of 15 minutes at a time, so time as long as 25 minutes. And if these houses are built, how will the existing station car park, station and level crossing cope with that large influx of cars?

Environment

The inevitable increase of visitors to our village/parish and Bucklebury Common can only have a detrimental effect on the environment. The ancient woodlands, ancient hay meadows, heathland and wildlife need to be protected. Bucklebury Parish Council says that habitat change as a result of inappropriate management are one of the most damaging threats facing rare species. These habitats should be safeguarded wherever possible and appropriate advice sought on managing them to conserve the natural environment. The extinction of species diversity not only in Berkshire but also in the UK."

If this development were to go ahead, these precious woodlands and rare habitats would almost certainly be under threat. The increase in the visitor numbers - our woodlands would be a short hop for the residents of the new development compared to the surrounding area they would be walking or driving to.

We can see no evidence that the new plans provide for adequate green spaces or for the protection of biodiversity. With so many people housed in the new development needing access to green spaces, there can only be a negative impact as the development takes away the Common and the adjacent AONB.

Also, talk of creating a Country Park, which I see has been changed to Community Park, in the strip at the top of the development. It does not make sense, as there is already very good countryside there from the woods next to Upper Bucklebury to the A4, and a lot of wildlife exists and has existed for hundreds of years. Also, what is a Community Park? Suitably vague I guess. Nothing will be done to it, the developers simply realise that it is too steep to build on. I have no faith at all that they have any regard for the countryside they are destroying.

Amenities - healthcare and education

The issues of Healthcare can never be underestimated, especially now when our NHS struggles to keep up with the demand. It is hard to offer the service required to keep the population healthy and safe. I see there is a small primary healthcare facility in Thatcham.

	<p>my understanding that a development proposal of the size of this one should have a Health Impact Assessment (HIA) of the proposal have been discussed with the health service providers. It is concerning that we have no evidence that Berkshire Council have organised an HIA. Also, since the NHS are struggling to recruit new GPs throughout the county, new practices anywhere, it is unlikely we will get a new GP practice in Thatcham at all and the current provision would be a huge increase in population this new development would bring. Thatcham Health Centre, Burdwood and Chapel Row would be people unable to get appointments for, at times, many weeks. There is not a local A and E, so this would add at a minimum travel on the local roads to the hospitals in Reading, Basingstoke or Oxford.</p> <p>Neither local GP practices nor local dental practices appear to have been consulted on the potential impact of the development and as a result only inadequate and unrealistic provision has been made in the plan. New educational establishments and the details on this are insufficient and contradictory. WBC has an obligation to provide education facilities for all children and there is no detail on how they will do this with the addition of an undetermined number of new children housed in the new development.</p> <p>It appears that the developers will provide a sum of money towards building a new primary school, but the timing of this is unclear or even if there is funding for it. Unless it is built first, there is the risk they will not be built at all since anyone who has children necessarily have already found a solution for their children in the existing schools.</p> <p>Similarly for secondary school provision. A contribution by the developers may be insufficient and it is unclear what they have given no details on proposed location so there is no assessment on the impact on traffic). If government guidelines state that a 6-form entry are unsustainable, we would be looking at a new school with at least a 6FE. However, we appear to have a school of pupils that the school would need to cater for, so the number of form entries is not stipulated in the plan. Interestingly, that a development of 2,500 houses would not provide enough pupils to fill a 6-8 FE school suggesting a smaller school than a 6FE school is unfeasible. This clearly has not been thought through enough.</p> <p>To Conclude</p> <p>To conclude, I would like to register my very strong objection to these plans. The Impact on the countryside, the town of Upper Bucklebury and indeed all the villages North of Thatcham will be immeasurable. With increased traffic, a steady increase in the consequential damage to the local environment, the character of the countryside and the peaceful villages will change. There is no going back if this is allowed, and I am certain there will be many regrets when all the above issues prove themselves. These issues, together with the lack of evidence that adequate provision of educational and healthcare facilities has been made make the Local Plan completely unsound in my view.</p> <p>As Government housing allocations are now only advisory and no longer an obligation, I would urge WBC to reconsider what you would be actually creating in reality rather than just on paper. There is no longer a requirement to build 2,500 houses. Sites can be sought for a reduced number of new homes, with a lower Impact on any one community. Please follow the lead of all around the country, who have wisely paused their plans based on previous housing allocations, and work on a revision in line with new planning guidance that could mean a vastly reduced number of new houses.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Gerdes, Robert
Consultee Full Name	Robert Gerdes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS811
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p><i>For avoidance of doubt I do not think the LPR is legally compliant as:</i></p> <p>Key documents and assessments have not been shared in a timely fashion within the locality.</p> <ul style="list-style-type: none"> • HIA not conducted. • Environmental documents missing. • Education breach of WBC obligations. <p>Example of this include:</p> <p>Health care</p> <p>WBC and developers do not appear to have arranged a relevant Health Impact Assessment in accordance with the current requirements (e.g. the HIA should reference how the proposal of the development has been discussed with the health services on primary health care services) nor have they evidenced having liaised with the appropriately with the local health care agencies. There has been no approach by WBC or the developers to any local GP practice to discuss site / floor space proposals. Local GP practices had no input into the proposed 450 sqm floor size proposal which was only discovered with the SP17 Policy. Accessing GPs is critical to everyone, however all three local practices are already overstretched. Furthermore one pharmacy closures in Thatcham have further worsened the pressure on the local primary health care. Therefore not having a pharmacy with an already overstretched (and diminishing service) will deny people their rights.</p> <p>Environment</p> <p>WBC notes in the LPR that a "Sustainability Charter is required" to establish how "policy requirements will be achieved (e.g. biodiversity net gains and anticipated overall positive impact on the environment sustainability). These documents do not appear to be publicly available for the Reg 19 consultation. Furthermore I believe the Charter "will be informed by" various strategies (e.g. biodiversity ecology) but again this is not available. This omission, along with what has been shared with WBC of the biodiversity strategy, is a notable and significant omission.</p> <p>What is concerning is the "double speak" used in the planning documents to give the impression that there will be mitigation measures – however there is no evidence of any serious attempt to investigate, catalogue what is actually present within the biodiversity and provide good clear remediation plans. WBC seems to be vague with an "all will be OK" which at this stage in the consultation is insufficient despite the feedback from throughout the consultation process where concern over the habitat, environment and biodiversity has been consistently highlighted.</p> <p>Education</p> <p>The provisions for education from Nursery, Early years through infant to Secondary education is NOT clearly defined in the LPR of WBC obligations on this item. Whilst there is a vague comment in SP17 that "the site will provide Early Years provision" in detail. I will further expand the point on education later in my feedback.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>In response to the wider LPR the set-up of the document was quite confusing and not straightforward to put down the all of my thoughts on a section that will be over looked, therefore I am also sending this to you to ensure my comments on LPR. My comments are as follows:</p> <p>Transport:</p> <p>a) Growing Traffic</p> <p>Comments I shared at the Regulation 18 stage about the plan highlighted the increasing amount of traffic through the WBC planners that the traffic from the proposed development would link to "Floral Way" and the "A4". However WBC exit at the north of the site onto Harts Hill. This only became clear on 6th Jan when the Transport assessment was published. Harts Hill is a steep road with not pedestrian walk way - however pedestrians still, on occasions, walk up the hill to the village and Harts Hill, as highlighted in my prior response, is dug up (WBC have records of the frequency of this over the last few years due to the COVID years due to a lower likelihood of infrastructure work being undertaken then) due to infrastructure challenges. There is no recognition by WBC about the suitability of Harts Hill road nor the impact it will create in Upper Bucklebury with the village and wider villages. WBC acknowledge that "some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury is clearly visible that the roads are not adequate, often without pavements (like Harts Hill), without street lighting (as it is not) result in serious accidents occurring with an increase in usage. In addition to the likelihood of accidents this in itself is a safety issue. The Environmental Assessment which proudly notes "to Reduce Accidents and Improve Safety" (see below point d).</p> <p>Response from Reg 18 question WBC noted "...the TA (Transport Assessment) report also acknowledges that there is a need to improve the highway network on the A4 corridor and adjoining links as a result of the THA20 development including some displacement of traffic onto rural routes such as Upper Bucklebury". This assessment, it must have been done without the impact of the now "new" plans using old reports to justify why there is little cause for concern however as highlighted plans have been changed at the Reg 18 comment made is just as valid now as it was then, in fact more so as the revision in the plan have not been shared.</p> <p>1 b) Access and Junctions</p> <p>The Transport Assessment says in para 3.26 "The access arrangements for the northern end of the NET site proposed (including turn lanes where appropriate) on both Floral way and Harts Hill. Results from modelling suggest that these will not conflict with the surrounding rural routes around this modelling nor the results from the modelling has been shared (or I certainly cannot find this). Whilst there are no drawings - so far I have not been able to find ones for this very important junction on to Harts Hill. As the "plan for an exit onto Harts Hill in 2023 this lack of information (and not being able to view it) is disappointing. I would ask that the planning officer and the Transport Assessment explores why these materials were not shared in good time.</p> <p>1 c) Car Parks</p> <p>Surprisingly drawings are showing a new car park on Harts Hill. The purpose of this car park is a mystery as WBC has not shared any of the drawings above in my points, a car park would add additional pressure onto a rural, unlit road - keeping in mind that this is the only road in the area. The local concern is that there is already levels of antisocial behaviour on the Common car parks and this unexplains this further.</p>

1 d) Strategic Environmental Assessment (SEA)

The SEA which was shared with the local plan notes in Objective 4 "To promote and maximise opportunities for all for transport." The SEA makes the following assessment: "To reduce accidents and improve safety" - Council assessments a Positive Impact on road safety as safe travel will be critical to the design of the site". Firstly and as highlighted above steep hill without pavements - safety will not be improved but will be reduced and impaired. With the new exit noted traffic will clearly increase on it meaning that there will not reduce accidents. In addition the SEA proudly notes "To increase cycling and use of public transport". The council assessment of this is that this is significantly positive impact! Their claim to have a significant impact on walking, cycling and public transport as the development should be designed with the School Buses from Upper Bucklebury to the local school, Kennet meaning a reduction in public transport - so their track. Furthermore it is not articulated how these lofty ambitions will be achieved in the materials that have been shared as words are easy to note and so too lofty ambitions – however without the specific details being shared on this, it seems has been undertaken or if it has it has not been shared with the public. In addition it is recognised that the locality is for walkers - however by building over what is currently walked over and by increasing traffic on the surround roads with (cars and walkers) this is in direct contradiction to these proud statements in the SEA.

Environment

As part of my Reg18 feedback, which has not been suitably addressed by the plan (as I will outline below) nor the feedback would again highlight:

There is no evidence to support the claims that SP17 will have a positive impact on the environment. I would put simply (farmed or otherwise) and developing it cannot result in a positive impact for the environment. In contrast and with common sense to believe it will have a very negative impact on the environment. I would question, how logically, can digging up the land (such as newts and red listed birds) can be positive; how can laying housing or road foundations into the land be good for creatures live in along with local plants; how can having thousands of people living in an area where bats, badgers, and other creatures unconstrained be an improvement for their environment? Any comments to the contrary is not being truthful.

It is nonsense to suggest (and I am quoting to response given by WBC to initial response to the plan) that 'a network of green infrastructure' include a new community park linking Thatcham to the AONB will help on this.' All of these animals and insects and plants will grow and go where ever they need to and are not constrained by an "a network of green infrastructure". Furthermore the claim is meaningless as there is no clear definition as to what this network actually is or comprises of, nor specifically which elements of infrastructure. I would simply ask – can a bat – which is present in these locales use this? Can a Red Kite? How about the rarer plants occur naturally in this area? If WBC has not undertaken a clear assessment and shared the outcomes of these questions using this "green infrastructure" as answer to these types of questions. As noted below – WBC demonstrates a lack of concern on this critical item and are not able to articulate how they will successfully mitigate this factor.

The original plan had "Two Country Parks" spaced across the slope inside the Biodiversity area. However NO details of how these "Country Parks" would be formed. In the updated SP17 text these "Country parks" have been what seems to be replaced by "community parks". This lack of details and specificity only highlights how little WBC considers this area and protect the public enjoyment of it (which in turn they highlight they will do). As SP17 has no proven plans for providing suitable and sustainable biodiversity of this area there will be inevitable "spill over of people" into the adjacent areas (which are AONB). Again this nor the impact of it with a development of this size and scale except to extolling the virtue of providing a somewhat artificial network which will "take advantage of the landscape" to "facilitate connection to the AONB, and include leisure routes across the existing habitat to lay vaguely termed "green infrastructure" would not aid the environment – and if it did the increase in pressure on the fragile ecosystem they are working to restore.

Education

As well as vagaries on the Early years provisions on education, the provision for Primary is also unclear. There is no clear number of schools or Form entry requirements. The LPR proposes the sum of £12m be contributed by the developer but it is impossible to assess if this is sufficient or not. The LPR does not state when it will make this funding available or how WBC has not highlighted the planning timelines for those schools to be able to accommodate new pupils. The LPR is also unclear. Currently the two local schools in catchment is Kennet and Downs, both which are oversubscribed. As this development would mean that Bucklebury school children would be penalised. Kennet school has not had any notable building or expansion in some considerable time (my two children attend or attend the school). The LPR proposes £15m to be contributed by the developer that another school will be built there are no details around the location of land to be provided and hence there is no possibility of this. Furthermore there is no evidence on how the £15m has been developed and whether the long term viability of the funding be paid in a single step, if it is to be paid in multiple years will it remain at £15m or increase (notable impact on this funding which have been in place at high rates before and after the LPR was drawn up?). This will result in insufficient spending on children. Furthermore the LPR references a report by David Locke Associates and Stantec on behalf of WBC and proposes a 6FE (6 year entry years) school half funded by the developer contribution. This could mean that the oversubscribed secondary schools receive not any funding - however they would logically be picking up those children outside of the 6FE years, if it was not an option. I believe Government guidelines on this is that secondary schools with less than a 6FE are not sustainable. HOWEVER the claim that this new development is not sufficient to fill a 6-8 FE school "5.18....the scale of growth proposed is not sufficient to fill a 6FE school" and "5.19.....it is not considered feasible for a new school to be smaller than 6FE." BUT with the apparent 40% increase in the 2023 LPR (to 1500 from 2500) a secondary school is likely not sustainable in this location - however the plans refer to this item. In the development plan it was noted that the education provision exercise was based upon WBC data on pupils aged 12 years old and totally out of date). This means costing assumptions will be incorrect. To name matters worse the developer has not engaged in a detailed demographic prediction and modelling exercise to determine future primary and early years provision in the town and has not attempted to predict the long term capacities of existing schools. " This seems to be a concern that these plans even more so if figures with developers are already noted in the planning application of £12m / £15m! V

without knowing:

- 1 a) how many pupils need to be catered for,
- 2 b) where the new school would be located,
- 3 c) the number of form entries needed,
- 4 d) timing of funding (and if it is inflation protected?) and
- 5 e) if the amount of money being proposed is really sufficient in the first place.

WBC, as an education authority, has a duty to make adequate arrangements for suitable and sustainable school provision across all school years if it has not been defined clearly; evidenced correctly or costed reasonably using up to date figures in the LPR.

	<p>Identity</p> <p>The LPR makes no reference or minimal acknowledgement of the identity of the local villages that will be impacted on Bucklebury.</p> <p>The development of this size from Thatcham up the slopes to Upper Bucklebury will clearly impact the village and v of West Berkshire is one of the last rural areas with historic ties to old traditions. A development of this size and nature and the rural identity of the area will be removed. This has not been addressed in the Plans. Interestingly WBC or lo as reasons to dismiss planning applications – so if this is so important why is there no or minimal reference to this in</p> <p>In summary the Reg 19 has omissions in it, used out of date data; has not included relevant documentations (with a noted); has ignored the impact of transportation on the area and the impact of this even though updating their plan with / exit); not highlighting in detail how health services will be delivered except to note that a 450 sqm facility would be p been published or is accessible; ignoring the impact on Health services in the area of such a large development; hav who have consistently highlighted the rich biodiversity of the area (WBC nor developer, as noted, has not studied th would adequately deal with the protected birds and species present, only to comment in general and unsubstantiated te network” without any back up research, cataloguing or solutioning taken place); nor considered the impacts on the A take place in the LPR; nor using up to date data on education and therefore leading one to assume incorrect assumpt proposed figures and costings nor even paused in the consideration of the plan in light of what the Secretary of Stat that local constraints and concerns should be noted (nb the local council – Bucklebury is opposed to the development). and the amount of gaps and omissions – it is not clear on how this proposal can be justified to proceed and as such</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hope, Kelley
<p>Consultee Full Name</p>	Mr & Mrs Kelley Hope
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS791
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 20:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>In response to the West Berkshire Council's Local Plan Review 2022-2039 Proposed Submission, I wish to register my concerns over the sites noted under the Harts Hill Farm area(s) as I believe the plan to be unsound. Information is either lacking or contains a breach of many policies outlined within the NPPF and WBC's own documentation.</p> <p>There are many items I object to including the negative impact to our countryside and the neighbouring AONB, the impact on the Harts Hill area. The road is already a busy route with cars ignoring the 40mph speed limit. Increasing the traffic is due to many cars from our road to cars along Harts Hill Road, I fear for the safety of my young family. There is not the infrastructure to cope with the current amount and the reporting carried out for wait times along Floral Way is not representative of the reality of people waiting at the point I would like to go into more detail is the Healthcare provision.</p>

I object on the following item:

Healthcare

SP17, the North-East Thatcham development plan proposes a 450sqm primary healthcare facility however there is no strategic planning. It appears that neither WBC or the developers have arranged or published a Health Impact Assessment for a major development. Health and wellbeing facilities are developed using a multi-agency approach but there appears to be no discussion between the North-East Thatcham Development Consortium and local practices.

NHS England commission very few new GP practices, even if they consider there to be patient demand. There is also a shortage of qualified GPs, in 2021/2022 there was a shortage of 4200 full time GPs, this is projected to rise to 6700 shortfall in 2023/24 which could be as much as 8800. Therefore there is no realistic prospect of a new GP practice being established in the foreseeable future.

It would also make no financial, organisational or geographical sense for an existing local GP practice to set up a branch at this development.

<Redacted> is currently registered to Chapel Row Surgery in Chapel Row. This isn't even in our town and the only way to get there is by the car as it is over 3 miles away. Any houses built between <Redacted> and Upper Bucklebury will also be registered to Chapel Row for accessing the surgery if you have no transport. Chapel Row already have over 8500 people registered to them with waiting times for appointments have increased over the years and their dispensary is no longer available to us as we live with the town centre. Thatcham town centre. These are also lacking as many dispensaries are now closing down putting even more pressure on the Boots dispensary. I recently had to wait nearly 90 minutes in a queue at the Boots dispensary on Brownsfield Road to collect a prescription.

There has been no discussion between WBC or the developers with any local GP Practice to see if any could relocate to this site is required and surely would be better located centrally to improve access and minimise traffic to surrounding areas.

WBC have proposed a healthcare site is required but have not provided any evidence of having liaised with the appropriate authorities or relevant HIA. They have not provided any evidence of how this health facility would be provided.

The 2011 ONS Census states that there were 10,241 dwellings in Thatcham. The number of new units proposed at the site would mean an increase to Thatcham of nearly 25%, an excessive number that neither the infrastructure or surrounding roads can support. Tull Way for example consists of only 75 properties however exceptionally low density when compared to the site's area.

We, along with many other residents of Thatcham object to the extent of the north east Thatcham Development, specifically the Hill Road and Harts Hill Farm area. We hope that you will reconsider the proposed Housing Site Allocations and look for a more appropriate, brownfield or within Settlement Boundary area, not within open countryside.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination
 * Yes
 * No

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review
 * Yes
 * No

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Relf, Helen
Consultee Full Name	Ms Helen Relf
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1015
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the planning for 2,500 houses in N E Thatcham on the grounds that the plan is fundamentally flawed. The reasons are listed below:</p> <p>Traffic – I believe there will be increased traffic through Upper Bucklebury and surrounding villages at busy times of the day during the morning ‘rush hour’ – with an additional number of cars from the new site people will be finding other routes. The wait at the level crossing can take 20 minutes at the present time – additional traffic heading south will only increase. The development plan – on a brown field site – included a bridge over the railway, which seems to me to be far more suitable.</p> <p>Schools – Kennet school in Thatcham is already over-subscribed. Will there be a new school on this site and will it be occupied (should this plan go through). The same applies to primary schools.</p> <p>Doctor – There will be additional pressure on all medical practices in the area – additional GP surgeries are not part of the plan.</p> <p>Environment – The area is a green field site – abutting an AONB with no evidence nor strategy for positive impact. In fact, in my opinion, it will be detrimental. There is likely to be damage to Bucklebury Common with increased footfall and the loss of the ecosystem of national importance. The three small, isolated areas inside the proposed settlement boundary have no planning or commitment to exclude subsequent development and, surely, cannot be described as ‘Country Parks’. There will be no green belt in Thatcham and Bucklebury and they will effectively merge and Upper Bucklebury will lose its identity.</p> <p>I find it hard to comprehend how the planning department passed this application.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Dorich, Matthew</p>
<p>Consultee Full Name</p>	<p>Matthew Dorich</p>

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1035
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>I am writing this email to raise my objection to the proposed development between Thatcham and Upper Bucklebury conceived without a logical approach to the impact to the local countryside or the local residents and more important up with no local knowledge or experience at all. Please find my objections listed below</p> <p>- Traffic</p> <p>The roads in this area already suffer at peak times and there isn't the structure in place to cope with an increase in v Shaw and Aldermaston Wharf roundabouts on the A4 you will see that they are already working beyond their capabilities pedestrians cannot be ignored and the fatalities will no doubt increase. The road layout above Thatcham will not cope road to Cold Ash and the through Upper Bucklebury coming to mind</p> <p>- Healthcare</p> <p>The existing healthcare system will not cope with the new development and there hasn't been any contact with any regards to opening a new surgery. The minor injuries unit is already too busy and with the nearest hospital being Re trying to help an huge local population, it makes no sense to build all these homes with no plans in place to increase</p> <p>- Countryside</p> <p>It is an obvious objection, but the loss of so much countryside will have huge effect on the local area and inhabitants. moved to or stayed in this area is the AONB and the footpaths that meander across the fields. This will all be lost. Th tipping and this will only be exacerbated. Add to this the litter that will be left on the roads and in the lay-bys and you hazard that was not there before.</p> <p>- Schools</p> <p>In relation to secondary schools, about which I know more, there is only the Kennet and The Downs, these are both and with the location of the development this will upset the balance with regards to catchment areas of schools. Som decade or so ahead with regards to where to live and which schools to send their children to.</p> <p>I hope that all of my points are then on board and that this ill-fated and terribly organised plan will not go ahead,</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Colthrop Village Consortium (Represented by Cunnane Town Planning LLP)</p>
<p>Consultee Full Name</p>	<p>Colthrop Village Consortium</p>

Consultee Organisation	Colthrop Village Consortium
Agent Full Name	Joe Cunnane
Agent Organisation	Cunnane Town Planning LLP
Comment ID	PS1393
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:58:00
Attached Files	PS1394 Cunnane (Colthrop Village) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	It fails to discharge the duty to cooperate by not consulting Thames Water regarding the time needed for the provision of the proposed housing. The settlement boundary is also incorrectly drawn.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	No

* No	
<p>Please give reasons for your answer</p>	<p><i><Extract of Full Representation relevant to consultation point - for full representation see attachment></i></p> <p>The Plan does not take into account other reasonable alternatives such as Colthrop Village. The allocation is not sufficient provision to ensure delivery. The Plan is not the most sustainable option and this is inconsistent with the NPPF. Please see the submission document.</p> <p>There are serious flaws in the North East Thatcham proposal. These are set out in a Committee report being considered at the Committee meeting on the 2nd March 2023. The main flaws are as follows:</p> <ul style="list-style-type: none"> • The number of dwellings being reduced from 2,500 to 1,500 is not correct. The 1,500 number is now stated as potential for 2,500 units; • large number of sites that have been referred to the Council have not been considered by Members at their meeting when they resolved to make this Reg 19 Submission; • The air quality assessment is flawed in that it has the wrong end date; • The Council has not properly consulted with Thames Water; • The settlement boundary for Thatcham is incorrect; • The provision for secondary schools is not consistent with Council policy; • The IDP has not taken account of the cost of a secondary school. <p>These flaws render the Reg 19 document unsound and could not be supported by an Inspector at Examination.</p> <p>THE NEED FOR MORE SCHOOLS</p> <p>The key reasons West Berkshire appear to be supporting a strategy of major growth at North East Thatcham is the need for more homes, the argument being that smaller more distributed sites around the town would not be of a scale to deliver such a major growth. The problem with this justification is that school places are needed now, with the demographics of the area showing a decline over the local plan period. The proposed secondary school will not be needed to accommodate the growth in homes as growth happens. The general forecast over the plan period shows a decline in the school age population and, on average a decline in population trend has an impact on education planning. Within the Newbury and Thatcham Spatial Area (for Education) this trend follows through with secondary education numbers expected to 'peak' in 2021/22 (i.e now) when assessing the Local Plan period up to 2037. When looking at projections for secondary need at the end of the Local Plan Period, the shortfall in secondary spaces is significant as more homes are being built. Based upon the existing secondary schools (plus the expanded school) and assuming a shortfall of 216 secondary school places across the area. This shortfall would not support the building of a new secondary school to accommodate this would need to be found through the expansion of existing schools in the catchment. The assertion that North East Thatcham is the only way to deliver essential educational infrastructure is therefore misleading. Should a Secondary school be viable it would need to be at least a 5 form entry. This would equate to approximately 300 places, more than planned at North East Thatcham. To conclude, neither the North East Thatcham proposals or the Colthrop Village alternative would trigger the need for more schools, especially within the Local Plan period. To justify such high levels of growth at North East Thatcham on this premise is not sustainable.</p> <p>TRAFFIC MOVEMENT</p> <p>The new development will have an increase on traffic wherever it is located. However, an important planning consideration must be to identify strategies that can potentially reduce traffic impact – specifically within areas that are identified as sensitive to air quality issues caused by traffic such as the Air Quality Management Area on the A4 from Harts Hill Road to the Epsom Road. The Consortium do not consider that West Berkshire Council has given enough consideration to achieving modal shift away from cars to reduce impact in its consideration of the strategy for North East Thatcham. The Colthrop Village Consortium have carried out a comparison of the North East Thatcham proposal with its alternative strategy, using the same assumptions as set out by the Council's own technical work. The conclusions show that considerably more traffic will travel along the A4 corridor from North East Thatcham with the alternative generated by our alternative strategy. This is because our strategy will distribute traffic more widely on the network of roads to the north and south of the town. In reviewing this work we have NOT reduced our traffic assumptions to take into account the Colthrop Village to the Thatcham train station, but in reality we would assume that walking to the station would provide an attractive alternative and as such our traffic impact is likely to be lower. It is also important to note that the above relates to similar levels of development growth in the Local Plan Period. Our alternative proposal will continue beyond the Local Plan period to add traffic from an additional 1,500 dwellings onto the network of roads.</p> <p>CONCLUSION</p> <p>This Regulation 19 submission demonstrates that the Colthrop Village proposal can meet a substantial amount of the need for homes over the plan period on a sustainable site. The proposed North-East Thatcham site in the Regulation 19 document is far less sustainable than the Colthrop Village site. Therefore the Colthrop Village site should be the preferred option. There is no doubt that other sites will be coming forward in the Reg 19 process that will make up the shortfall of approx. 550 units throughout the Plan period, e.g. the Henwick Park proposal. The North East Thatcham proposal is seriously flawed in several respects as set out in the Extraordinary Committee report. Therefore it cannot go forward for Examination. The whole Reg 19 procedure should be paused and a fresh Reg 19 submission with the flaws in the current document and properly examines all options including Colthrop Village, the subject of this consultation.</p> <p><i><Proposals relating to Colthrop Village logged as an Omission Site ID: PS1394></i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The allocation in Policy SP17 does not adequately deal with the need for water and foul sewerage, education and health services. Please see the attached Reg 19 submission document.</p>
<p>4. Proposed Changes</p>	<p>We propose the deletion of the SP17 allocation and the allocation of Colthrop Village as a more sustainable alternative to the SP17 allocation in the current document.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	In order to present the Colthrop Village effectively to the Examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Harry, Jonathan
Consultee Full Name	Mr Jonathan Harry
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1031
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposed Local Plan for the development of up to 2,500 houses in North-East Thatcham grounds –</p> <ul style="list-style-type: none"> • In 2015 the WBC made a strong case against the development at Siege Cross, stating the potential devastating impact on the local environment and the Area of Outstanding Natural Beauty. Specific reasons included the loss of landscape identity, the urbanisation of key areas of landscape, the failure to conserve the historic and rural landscape of the AONB, and the overall character of the AONB. All these points are still valid and are even more important as the proposed development would further erode the overall character of the AONB. • Increased traffic through Thatcham, Upper Bucklebury, Midgham and Cold Ash • Greater flood risk to Thatcham • Increased light, air and noise pollution • Significant pressure on local services and amenities, which are already stretched <p>I hope that those making this decision will think about the context of the decision. This will impact many generations and the local environment forever. While I am aware of the need for more housing, adding more in this area – and going ahead with the proposed development – is short-sighted and will create an appalling legacy for the Council.</p> <p>The Local Plan should not be adopted.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Utley, Jack
Consultee Full Name	Mr Jack Utley
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS827
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

account the reasonable alternatives, and based on proportionate evidence.
 * Yes
 * No

2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
 * Yes
 * No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

I wish to raise my objection yet again to the proposed plan for development in NE Thatcham outlined in the Local Plan. The plan is unsound and lacks the proper evidence/analysis required to support such a large scale development and I am amazed that it has proceeded on this course despite the overwhelming objection from its local residents, who live and work in this community, and the government detailing that housing numbers would now be an advisory starting point and not mandatory. I urge the council to do what other Local authorities have done and pause its plan making process.

The proposed development will negatively affect me and my family as well as all the residents of Bucklebury parish, in the following ways:

- **Increased traffic towards Upper Bucklebury** – following the publication of the Transport Assessment on January 15th, 2018, there will be significant displacement of traffic from the A4 and Floral way due to the nature of the exit from the north of the village. In your own words “*there will be some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury*”. The roads are inadequate for safe and sustainable transport such as walking and cycling. As someone who cycles to work with children, I already find the flow of traffic particularly fast, dangerous and unsafe for children, particularly between the village and Row, where the traffic is very fast and there are no pavements or street lighting. Adding to the flow of traffic on the A4, the roads coming off these routes can hardly be described as “Safe” transport.
- **Increased littering, fly tipping and anti-social behaviour** along Harts Hill Road and into the village and AONB. Harts Hill will surely only increase such activity. I have personally already been involved in confronting intoxicated drivers in the middle of the road on Harts Hill, nearly causing an accident with moving vehicles, having been up to no good myself, lying by the side of the road unconscious. Can the council explain how the addition of such a car park will serve the community?
 - Please can you show your reasoning and analysis that serves to support your assessment that the “*Policy 10 on road safety as safe travel will be critical to the design of the site*”?
 - Please can you show your reasoning and analysis that serves to support your assessment will have a significant impact on cycling and public transport as the development should be designed with these in mind”?
- I have to question both of these assessments and how you arrived at this proposal as significantly positive outcomes for the community.
- **There will be a Negative Impact on healthcare provision for existing residents.** The NE Thatcham Development is a primary healthcare facility but is woefully light on detail on this matter. A development of this size and scale should have a purpose Health Impact Assessment, but I have been made aware that no such assessment has been arranged or commissioned by developers. There has been no approach by WBC or the developers to any local GP practise to discuss an approach to how such a branch GP surgery could be staffed, funded and administered. The reality is that existing GP practise in the area is underfunded. You are proposing a healthcare site that is unsuitable for NHS primary care and have not made provision for that 1500+ new houses and families will make on a local NHS struggling to cope. As a local resident, I find this lack of analysis and detailed analysis deeply disturbing and would request that you provide proper evidence for the provision of healthcare.
- **There will be a negative impact on the environment for existing residents and wildlife.** The collateral damage to the biodiversity opportunity area and its ancient woodlands and heaths will be irreversible. So claims made that the development will protect the environment are clearly fabricated given the lack of evidence provided to support these claims. Your own LPA Statement accepts that SP17 will have a negative impact on environmental sustainability. “*The site is a greenfield site and the development will have a negative impact on the environmental sustainability which would need to be mitigated.*” As there appears to be no provision for and protecting biodiversity in the plan, there will inevitably be a spill over of people and traffic into adjacent areas, causing pressure on the fragile eco system. Go figure!
- **Finally, there is no clearly defined plan for the provision of schools** within the local plan review. As a father of two children and soon into to be secondary education, this is very worrying. I also noted that the data used in the Thatcham Development is on data from a study in 2011. Again, the basis for this recommendation using 12 year old data continues to support a development that is unsound and based on poor quality data. WBC, as an education authority has a duty to provide suitable and sufficient provision for schools. No evidence in the LPR this has been clearly defined, evidenced or thought through properly. Again, this is evidence that the plan is not considered/realistic provision for sports fields which require large amounts of flat land and have no funding all

	It would be nice to think my local council was more focussed on representing its existing residents and preserving its developing every last square inch of green field sites and natural surroundings, to the detriment of many and the final much the new residents of such a development will thank you when their kids can't get places in schools, access GF and spend their lives stuck in traffic in around Thatcham and Newbury along with the rest of us, becoming increasing and villages have turned into just one more urban sprawl.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If required
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rendall, Neil
Consultee Full Name	Mr Neil Rendall
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS936
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:08:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>1 <u>General</u>:</p> <p>It is now acknowledged that we humans are systematically destroying our planet, and you still carry on building just to be 'sustainable' and growth by definition is NOT sustainable! Thatcham has been growing consistently for the last the fastest growing town in the whole of the EU. The latest development assured us that Floral Way was the limit of that was then it appears. Now, that limit is irrelevant and can be ignored.</p> <p>I recognise that we need homes. Any building is seriously detrimental to our planet for a myriad of well known reasons. The damage are pitiful to the point of being farcical.</p> <p>If you're serious about mitigating the harm done to the environment by developments such as this then the roofs of the houses should be green, grass, or wild flowers, or solar panels. And the houses would all be built on rain catchment tanks. And many other far better options.</p> <p>I'm not convinced that we need as many houses as you say and firmly believe that the whole project is driven by:-</p> <ol style="list-style-type: none"> 1 Landowners wanting to capitalise on their assets. 2 Developers wanting to do what they do - make a profit. 3 The above lobbying government to support their aims. <p>But, we do need housing. So, all brown field sites must be exhausted before any agricultural land is built upon. "Poor" this site, is "poor" because it has been over used and abused for centuries, even millennia, in particular the last half century. Over time if nature is allowed to take it's course. Building houses in the same old way is quite the worst thing to do. A better way is to build houses in a way that is sustainable and does not harm the environment.</p> <p>We must use ALL brownfield sites and then scatter a small number of houses among the existing villages.</p> <p>Your Policy SP 5 para (a) states:-</p> <p>"a. To withstand predictable effects from climate change for its expected lifetime:"</p> <p>Is this referring to the lifetime of the plan? The lifetime of the development, or the lifetime of the planet?</p>

	<p>Clearly we must consider the latter and the answer is blatantly obvious. It can NEVER withstand the devastating effects of a major thoroughfare feeding 60%-75% of traffic for this site through Upper Bucklebury. Southbound via Floral Way which is already clogged at peak times. Traffic bound North, East and West will come up Harts Hill Road inundate a small village with massive, heavy traffic movement that would devastate this rural village.</p> <p>You claim that the plans you have for the road will make it safer than it currently is. This is blatantly absurd. Did you know that the plans include a large hedgerow and 10-15 meters of earth banking on the east side of the road? This means a large hedgerow and 10-15 meters of earth banking on the east side of the road for pedestrians/cyclists on Harts Hill Road. How could anything be safer than that?</p> <p>1 <u>Harts Hill Road</u></p> <p>1 <u>Infrastructure:</u></p> <p>Schools, dentists and doctor's surgeries are currently stretched to their limits and beyond. It's good to know that it is essential that current infrastructure in these areas is adequate before any housing is built. This means building surge capacity for houses.</p> <p>These plans are unsound because they make no allowance for the time it takes to undertake the multiple, complex projects that are required before building surgeries.</p> <p>These plans are unsound because they make no allowance for primary and secondary schools when the first children are born in further pressure on our already over-subscribed schools.</p> <p>1 <u>Safe and Sustainable Transport:</u></p> <p>Really? And just how is this achieved? It appears the plans just say that 'it will be' Safe and Sustainable with no justification.</p> <p>1 <u>Bucklebury Common Vision</u></p> <p>Currently has a project to control, not restrict, access to the common, a very special local area that hopes to improve a diverse environment. This is an AONB and any development within the vicinity will have serious consequences for the mass of houses well within an area of influence and at 2.2 or 2.4 people per dwelling could potentially put 5000-7000 people within distance of this unspoilt environment.</p> <p>This makes the Thatcham NE Development wholly unsound.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor

	Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1426
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>The proposal to allocate a 1,500 homes strategic housing allocation at NE Thatcham risks "putting all eggs in one basket" such as have been experienced with the strategic allocation at Sandford.</p> <p><i>Para 6.58</i> The statement "the new revised settlement boundary will be defined following the studies and work identified in the previous stage" leaves an unacceptably large degree of uncertainty. It would also make it difficult to resist planning applications for dwellings on the site past the 1,500 specified in this LPR.</p> <p>The proposed site is some distance from the town centre and the railway station. This means that journeys are much longer for private cars. This site is not therefore sustainable</p> <p>This proposed strategic housing allocation would adversely affect Theale as it would greatly increase the level of traffic. More vehicles would head east along the A4 to Reading and to the M4. This would lead to increased, unacceptable, congestion in Theale, particularly with the A340, Hoad Way/ Waterside Drive, and at M4 Junction 12. There are already significant delays emerging from Waterside Drive onto the A4 in the evening peak (TomTom mobile phone derived data for April 1-4 2021)</p> <p><i>Air Quality Assessment</i></p> <p>The Air Quality Assessment has not been revised to take account of the change in the number of dwellings in the plan period stage to 1,500</p> <p><i>Transport Model</i></p> <p><i>The West Berkshire Transport Model has not been revised to take account of the change in the number of dwellings in the plan period Reg18 stage to 1,500</i></p> <p><i>Site population is based on the existing population of Thatcham from the 2011 census, which is 11 years out of date</i></p> <p><i>Section [app C section 2.6] states: "TRICS selection data includes: Land Use Class: 03 Residential" whereas Policy SP10 states:</i></p> <ul style="list-style-type: none"> • <i>Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sq. metres Class E and F2);</i> • <i>450 sq. metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body;</i> • <i>Early years provision;</i> • <i>A 2.5 FE primary school on site and sports infrastructure requirements of the school, land to be provided and build costs to be met by the applicant;</i> • <i>Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation will be informed by a feasibility study, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders;</i> • <i>1,200 sq m community indoor facility to be used for sport and community uses with a variety of room sizes (current uses will generate significant extra traffic, which will not be included in the TRICS modelling because of the policy SA/SEA App entries 3a & 5 5b</i> <p>The policy will NOT improve access to education, health and other services as the education services it would provide are not on site</p> <p>The policy will NOT have a positive impact on landscape character as it will cause green fields to be built on</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>The allocation should be significantly reduced or removed.</p> <p>The new settlement boundary should be drawn for the site in this LPR.</p> <p>The Air Quality Assessment should be revised to take account of the change in the number of dwellings in the plan period</p> <p>The Transport Model should be revised to take account of the change in the number of dwellings in the plan period from 1,500 to 1,000</p> <p>Transport Model should be re-run with population based on the 2021 census and required mitigations reviewed</p> <p>The transport model needs to be revised to include traffic generation from these land uses and any necessary extra capacity</p> <p>The effects of the policies on SA Objectives should be changed from positive to negative and the sustainability of the plan should be reviewed</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Southgate, David
Consultee Full Name	David Southgate
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1047
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 22:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	No

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The main thrust of my representations are made against the tests of soundness as set out in paragraph 35 of the NPPF. For the reasons set out within my letter I consider that the plan is unsound and fails against each of the tests as set out in paragraph 35 of the framework in numerous areas of the plan. The failings against the tests of soundness are set out in each of the subsequent sections of my letter.</p> <ul style="list-style-type: none"> • The LPR is not positively prepared and would not achieve the goal of sustainable development for WBC and the wider Thatcham area. • The LPR is not justified. Many of the grounds for assessment of impacts and benefits lack credibility and is not based on available evidence. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham represents an appropriate strategy for WBC. • The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable within the plan period. • The LPR is not consistent with national policy. In many instances the allocation for development of North East Thatcham under policy SP17 would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB. • The process of assessing the impact of development under policy SP17 through the sustainability appraisal is fatally flawed and is not a matter which can be easily remedied through modifications to the plan. • The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence <p>The information available to support the current consultation (Reg 19) being undertaken on the Local Plan has several major flaws.</p> <p>These include:</p> <ul style="list-style-type: none"> • The housing numbers for northeast Thatcham – positioned in Reg 19 as a reduction from 2500 dwellings to 1500 - is not correct. The Regulation 18 Consultation envisaged that only 1250 dwellings would be built in the plan period, and this has increased to 1500. The 1500 number is stated as both a minimum and an approximate number and the supporting studies are still based on an eventual size of 2500 dwellings. The number of homes proposed for this site could therefore be increased to the original 2,500 when the Plan is reviewed after 5 years or in the next plan period. • The update of the Housing and Economic Land Availability Assessment (HELAA), which was published only on 20th January 2023, includes a large number of sites that have been added since the last update, and which have been rejected. The WBC process is that the HELAA is at the start of the process not the end. • The Air Quality Assessment that is part of the consultation documents is based on the LPR running to 2037, not to 2039 which it now should do. This affects the traffic levels forecast for the end of the LPR period and the resultant traffic pollution. • There is no evidence WBC has complied with its legal duty to cooperate with Berkshire West Clinical Commissioning Group concerning the size of the GP surgery promised for north east Thatcham. • There is no evidence that WBC has consulted properly with Thames Water over the time needed for provision of water and foul drainage, and therefore it does not know if the houses for north east Thatcham are deliverable in SP17 in the plan period. • The Settlement Boundary background paper shows the Thatcham settlement boundary already extended to the line needed for the original 2500 houses, yet the plan now refers to a minimum of 1500 houses – this could be read that 2500 dwellings is still suitable and can be developed within the extended boundary. • The new provision for secondary schools in north east Thatcham is not consistent with WBC guidelines for the minimum viable size of a secondary school. If the primary provision is 2.5 Forms of Entry, then so presumably is the secondary provision to meet the impact of the development. A Council policy 2013 states that the minimum viable size for a secondary school is 4 Forms of Entry. • The Secretary of State's Written Statement of 6th December 2022, which removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local

Plans, removed top-down housing targets (particularly for Local Authorities with constraints like AONBs etc.) and gave a two-year transition period for LAs in the final stages of preparing Local Plans and this statement should be taken into account by WBC.

Site Selection Process

- Lack of evidence on methodology to select North East Thattham.
- Obviously made following decision to no longer allocate the garden village at Grazeley. Lack of reference to this.
- Selection of Site at North East Thattham would lead to development in the countryside and important Strategic Gap between Thattham and Bucklebury would be lost.
- WBC resisted previous application for development at Siege Cross. Lack of consistency to approach here.

Sustainability Appraisal

- Lack of justification for conclusions to the Sustainability Appraisal on impacts from development.
- Lack of any consideration of reasonable alternatives to development on other sites.

Because of these points, and many more, the Reg 19 LPR Submission in its entirety should be considered as unsound.

The site will be masterplanned and delivered as a whole to achieve a comprehensive development. It is highly surprising that Masterplanning is yet to take place for the site and that there is no vision for how the homes will be accommodated on the site. The provision of all infrastructure, services, open space and facilities will be timely and co-ordinated. The Thattham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been positively responded to. There is no detail on the infrastructure or other facilities. It is also clear from the viability work undertaken that the infrastructure has not been costed adequately and there is no available evidence that the site is deliverable.

Specific Objection: Traffic

Bucklebury Parish Council commissioned a Traffic Study and this was undertaken by Yes Engineering. The Headline Conclusions of the Study are:

- The trips rates used by WBC are unreliable and not robust.
- The trip distribution is unrealistic (all evidence suggests traffic will be diverted from the A4).
- The mitigation measures are improbable at best.
- The location of site means car-borne travel will dominate.
- Significant impact on highway network.
- Unsustainable location with limited alternatives to car use.
- Likely to lead to rat running through the village to access M4.
- Highway network in the vicinity of Thattham Northeast is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic.
- Increase in traffic through Bucklebury will pose highway safety issues.
- SID studies have shown most of the Upper Bucklebury main routes are already above the ACPO action levels for speeding

Specific Objection: Infrastructure

Thames Water have raised capacity concerns regarding this proposed Thattham development.

Specific Objection: Heritage Impact

- The allocation at North East Thattham surrounds the Grade II listed Colthrop Manor.
- There is no evidence that the WBC has taken into account the setting or significance of Colthrop Manor as a designated heritage asset in the allocation of North East Thattham nor has WBC considered the impact of the development or the way in which the capacity of the site would be affected by it.
- A Mineral Resource Assessment (MRA). A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how the impact of the development on their settings has been considered. Consideration of heritage impact should have been undertaken as part of the site selection process and subsequent assessment of site capacity. It is not considered appropriate that this is left to later stages of the planning application process. A Construction and Operations Management Plan (COMP) shall accompany any planning application on the site. The COMP shall safeguard the oil pipeline from operational works, including the provision of an appropriate buffer. The Oil Pipeline is shown in figure 39 of the Thattham Growth Study and runs along the entirety of the southern boundary and there is reference to a 6m easement either side. Assuming that this also includes a restriction on building roads then this could lead to significant impediments to the implementation of any development on the site.

Specific Objection: Climate Change and Flood Risk

- The proposal allocates two bullet points to “Net Zero Carbon Development” and again is woefully inadequate in this area. There is no evidence that a net zero carbon development would be viable or has been costed as part of the viability appraisal produced for the site.
- Flood risk is a significant threat to Thatcham, and lack of evidence to suggest this has been adequately considered. The recent severe Thatcham flood started well above the site and were already a river at the top level of the development on Harts Hill Road from my own personal experience of the event.
- It is unclear how any development on this site would deliver a ‘net gain’ for Thatcham Town in terms of drainage and there is no allowance for this within the viability report for the site.

Specific Objection: Environmental Issues

Bucklebury Says No has identified a number of serious environmental threats posed by the proposed Thatcham North-East strategic development site (SP17). These include:

1. Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands and heaths, in particular the Common;
2. Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB that will forever impair enjoyment of the open countryside by local communities;
3. Causing detrimental impacts to legally protected wildlife known to be present on the site but assuming that sufficient mitigation measures can be taken after development e.g. through the vague promise of a ‘community park’.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the draft LPR, I conclude that there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is every reason to believe it will have a significantly negative impact.

For example, the WBC states in the LPR that a Sustainability Charter is required to establish how ‘policy requirements will be achieved’ (including the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability). It maintains that the Charter ‘will be informed by’ various strategy documents (including one on ecology). Yet, the strategy documents either do not exist or have not been made publicly available for the Regulation 19 consultation.

Green Infrastructure The site will provide a comprehensive green infrastructure network which will take advantage of the landscape features of value within and around the site. This network will comprise: A new community park linking Thatcham to the North Wessex Downs AONB; Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes accessible to all users; It is unclear why links to the AONB are being encouraged as part of the proposed allocation. Given the sensitivity of the common and the wider AONB then impact through an increase in access should not be encouraged. This is expanded on within further sections of these representations.

They estimate that at least 4,000 people will be concentrated in the development site. They of course must have access to green space for recreation and general wellbeing. I do not believe that the claimed provisions for green space will satisfy this demand on site. The original Thatcham Growth Plan had a vague proposal for two ‘country parks’ spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming the potential for significant biodiversity enhancement over its current land use. No details were provided about how they would be formed. Our own feasibility study showed the complete lack of preparation for such country parks, not least that they should be merged, and properly managed and funded to deliver that stated biodiversity enhancement. Now, in the updated SP17 text, the country parks have been downgraded to undefined ‘community parks’ which only proves how little commitment WBC has given to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be spill-over of people visiting adjacent areas.

Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green infrastructure network which will ‘take advantage of the landscape’ to ‘facilitate connection to the AONB, and include leisure routes accessible to all users.’

Meanwhile, the management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the fragile ecosystems they are working to restore and nurture.

In fact, the LPR’s own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability: ‘The site is a greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated.’ But there is no detail whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the planning application process.

However, the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact on sustainability – largely by absurdly ignoring the environmental consequences in favour of social and economic benefits that are anyway highly questionable (see other articles herein).

The overall thrust of the SP17 policy is clearly to build as many houses as possible in a small area of countryside, while making empty promises about how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on consultants to prepare the housing plans and justify the ‘growth’ requirement, there is no evidence of any serious attempt to investigate, analyse and systematically address the consequences. Everything will be all right because their own unsubstantiated policies say it will be.

Specific Objection: Ecology / Biodiversity Impact

- Significant impact on ecology / biodiversity as a lack of proposed allocation.
- The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is part of the Bucklebury Plateau Biodiversity Opportunity Area.
- The data being used to establish the presence of species is out of date. In 2020, Bucklebury Parish sought environmental records for the 41 LWSs impacted by SP17:
 - 80% of surveys were conducted more than 15 years ago
 - 50% were more than 20 years old
 - 44% were over 30 years old
- BPC has appointed ecologists to conduct an independent study of the impacted area. The findings from a single day walk on public access routes indicated that the site had a much higher biodiversity value than previously appreciated, including the presence of seven species of threatened breeding birds and one threatened migratory species, several bat species and abundant badger setts. The hedges, old trees and gullies served as important corridors linking up different habitats within and beyond the site boundaries. These initial findings imply that a full study will show the required mitigation measures and BNG will be far more complex for the development than was anticipated by the planners.
- This one study has provided more information about the site than has been presented in the whole the LPR and its available evidence base. The area has a much higher biodiversity value than assessed by WBC.
- Protected species are present across the site and will be impacted. No detail on mitigation measures has been presented by WBC. Critical habitat network features are under threat from the development and will severely impact distribution of key species.

Specific Objection: Landscape and Character Impact

- Significant impact to character of landscape – not adequately assessed by WBC
- Development would have significant impact on AONB and is in the direct setting.
- Development would lead to increase in visitors to the common.
- The proposed country park is inadequate and lacks justification.
- A Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB, and measures to mitigate the impact on biodiversity. It is clear from the wording of this section of the allocation policy that WBC accept that the site is within the setting of the AONB and that there will be an element of harm (in respect of lighting) which requires mitigation. This position conflicts the position in the Sustainability Appraisal which assesses the impact as being neutral in this respect. It is considered that the harm to the AONB extends to a far greater impact than just lighting and is a severe failing in the conclusions of the Sustainability Appraisal.
- A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2021) of the site. Given the highly sensitive location of the site it is highly surprising that an LVIA has not already been carried out for the proposed allocation.

Specific Objections: Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Local Plan Review (LPR). There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for children. Without this provision, the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to estimate the subsequent impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic across the whole Thatcham area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 NE Thatcham Strategic Site Allocation, merely states that 'the site will provide Early Years provision'.

The provision for Primary school education is unclear and contradictory. There is no data or evidence on the planned numbers of schools or Form Entry requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. However, with no recent data available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state the timing of this funding or school place provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs School or Kennet School as they are in the catchment area for both.

Where schools are oversubscribed those children who live nearer to the school are given precedence. This means that children from the proposed NE Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is inconsistent, incomplete and contradictory on the provision of secondary schooling in and around Thatcham. It proposes that the sum of £15 million be contributed by the developers to Secondary Education. There are no details of the location of the land to be provided and hence no possibility of assessing its suitability.

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes funding for a 6-8FE (Form Entry) secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the NE Thatcham development (which proposed 2,500 houses), is not sufficient to fill a 6–8 FE school:

Specifically

- 5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. However, the scale of growth proposed is not sufficient on its own to fill a 6-8FE secondary school.
- 5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities for their students, so it is not considered feasible for a new school to be smaller than 6FE.
- With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school simply cannot be sustainable in this location.
- Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on WBDC data on pupil yield from a study in 2011. Clearly the use of 11 year old data is inadequate. The Development Plan states:
- 4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary and early years educational demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably educational provision will be examined in more detail as any development comes forward.
- The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for the development.

In summary, it is therefore clear that the plan for secondary school provision is 'unsound' :

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Conclusion on Schooling :

West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. How this obligation will be met across all school years is not defined or evidenced in the LPR.

Specific Objections: Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the A4 and therefore in an area with the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If the school itself is not viable, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public due to safeguarding and other concerns.

Outdoor formal and informal sports pitches and areas to meet the identified need of the development; Open space to meet the needs of the development in accordance with Policy DM41; Given that most of the site is on a gradient it is unclear how formal or informal sports provision will be brought forward on the site.

The objective of WBC and the North-East Thatcham Development Consortium to provide sports fields has not been met as they have not provided evidence for funding or for a suitable location.

Specific Objections: Healthcare provision

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that a GP Surgery be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, the document is bereft of detail or insight into strategic healthcare planning.

- Proposals for a major development that is likely to have a significant health impact in relation to its size and location, should be accompanied by a fit for purpose Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. The HIA should include reference to how the proposals for development have been discussed with health service providers regarding impacts on primary health care services. The development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the scheme because an unacceptable impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that neither WBC nor the developers, as public and private stakeholders respectively, appear to have arranged or published a prospective HIA specific to the proposed North-East

Thatcham development.

- Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy 2017-2020 2021-2030, has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Integrated Care Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to determine the health care requirements associated with new development. It is of concern that there appears to have been no direct engagement between the North-East Thatcham Development Consortium and local general practices.
- Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for improved services. NHS Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an even worse shortage of GPs in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or West Berkshire in the foreseeable future.
- GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable and to increase access and extend the range of services and primary healthcare professionals available on a single site. It would make no financial, organisational or geographic sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional administrative, computing and staffing costs and encumbrance working across two sites.
- There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor-space or location to which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the middle of Thatcham to improve access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the population. This would be likely to be supported by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. Local practices did not have input with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2022, Appendix D.
- The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Medical Practice (west of Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are already overstretched. The two Thatcham doctors' surgeries run independently of each other, and their combined lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on GP services because there are more young children, a higher maternity workload, less local extended family support and there is initially a higher housing turnover. One permanent and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care locally.
- Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients needing to travel further afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents were registered at a Thatcham dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have approached any local dental practices regarding the potential impact of increased workload resulting from additional housing.
- Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates) - Stage 2: Thatcham Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established early in the master planning process to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in September 2020 includes no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at capacity and suggesting a new health centre.

Conclusion:

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having appropriately liaised with local health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and so have not made provision to mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope. The objective of WBC and the North-East Thatcham Development Consortium to improve access to the health service component of community infrastructure has not been met as they have not provided evidence for the provision of a viable primary care medical facility.

I trust that my comments are considered and that the proposed Thatcham NE Development in the LP is considered unsound.

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

- * Yes
- * No

No

Please give reasons for your answer

Consultation and Duty to Co-operate

- Lack of evidence that WBC have complied with duty to consult with local residents and take representations into account.

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Woods, Lesley
Consultee Full Name	Lesley Woods
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1330
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 12:35:00
Attached Files	Lesley Woods REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Transport</p> <p>Additional housing will increase traffic on roads around Thatcham, Upper Bucklebury, routes into Newbury, Reading and Basingstoke (using the level crossing). 1,500 houses will bring upwards of 3,500/4,000 new residents into the area. There will be around 1,300 for single car families and 2,000 extra vehicles for 2 car families (not taking into account teenagers and young people) a heavy extra burden on our already busy roads. I realise that the public is being asked to consider other ways of travel and public transport, but this is not a totally practical mode of transport for all. The inevitable increase in traffic through Upper Bucklebury on the village and safety issues especially regarding the local school. Harts Hill is a dangerous road and increased traffic will be so. Cycle routes along the A4 are not used to the extent that perhaps the Council thought they would be and I believe a lot of money has been spent unnecessarily here. I doubt that anyone, unless really fit would want to cycle up Harts Hill and back down. If an average of additional 2,000 car journeys are made from this development, then the increase in traffic movement is going to be excessive for the area. Increased traffic wanting to use the Thatcham level crossing, Basingstoke and the Newbury retail park will create even more congestion in that area. No consideration has been given to alternative sites, ie Colthrop with a new bridge over the railway line and canal.</p> <p>Local Services</p> <p>No consideration has been given to the increased pressure on Schools, Dentist and Doctors surgeries. We are all struggling with appointments for Dentists and Doctors, which was proven recently when Thatcham Health Centre and the Burdwood Health Centre had no new doctors or dentist accommodation will be built until building is well underway/or finished so excessive pressure on Schools and schooling will suffer badly with this increase in numbers of pupils. As quoted in the residents newsletter "The plan as to how the necessary supporting infrastructure will be achieved to accommodate the increased local population is not even adequate for the present population."</p> <p>Car Park on Harts Hill</p> <p>Why is an access and car park proposed on Harts Hill? What purpose does it serve? This will only encourage more cars and is definitely not suitable for heavy traffic especially when approaching Upper Bucklebury.</p> <p>The car park could encourage night time antisocial behaviour which is apparent in various car parks on Bucklebury and in the Alternative Sites/General</p> <p>How much consideration has been given to alternative sites, for example Colthrop and looking at potential brown field sites over a wider area but still achieving the same number of additional housing and making the local supply of supporting infrastructure with the recent pandemic and high numbers of the employees working from home, the council could also look at converting into residential properties without having to build on vast acreage of countryside. This could also encourage our town to grow again. Vodafone have recently downsized their HQ from seven buildings to four by virtue of people working from home.</p> <p>Within the past ten years an application for 700 houses was put before the council at the bottom of Harts Hill adjacent to the railway line. The council refused this application, although I understand it went to appeal but nothing happened. Why is WBC now giving its approval for an increased numbers of housing?</p> <p>There is also a proposed development at Sandford, which I believe was approved but where nothing has happened and developers cannot seem to agree on access why can this not be resolved and progressed?</p> <p>Countryside and Wildlife</p> <p>Building 1,500 (at least) residential properties abutting an AONB will have detrimental affect on the current wildlife. It will be towards Upper Bucklebury and beyond, and no doubt there will be more wildlife killed on the roads with the increase in traffic.</p>

	<p>range. Is the council going to have full audit of what wildlife is within the area so that any rare or low numbers of flora or any potential building commences?</p> <p>Flooding</p> <p>Has any account been taken into consideration about flooding if this development goes ahead? Harts Hill to Upper E see that in recent years with higher and heavier rainfall that these residential properties will be liable to flooding as wa The current flood alleviation schemes are nowhere near Harts Hill so these sites will not have any beneficial help.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1705
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Appendix 2 of the draft Local Plan defines Settlement Boundaries as follows: "They identify the main built up area of a settlement and is considered acceptable in principle, subject to other policy considerations."</p> <p>This definition creates a presumption in favour of development unless this would conflict with policies within the Local Plan. The area for housing will in any case need to be reduced from what was envisaged in the Strategic Growth Study, in line with the densities defined in the West Berkshire Density Pattern Book. The settlement boundary needs to reflect this.</p> <p>Appendix 2 states that "Boundaries will exclude: Recreational or amenity open space which extends into the countryside in form and nature. This includes designated Local Green Space." The map on page 65 shows three areas of "Local Green Space" adjacent to the 'site boundary'. These are clearly 'recreational or amenity open space' – so must be outside the settlement boundary. There is no supporting evidence to support their location and size – so their position on the map must be considered incorrect.</p> <p>Paragraph 6.58 of the draft Local Plan states: "The new revised settlement boundary will be defined following the settlement boundary policy at the application stage."</p> <p>The 'red line' boundary map of the map on page 65 of the draft Local Plan is described as the "North East Thatcham settlement boundary" of site THA20. However, this same boundary has been incorrectly transferred to the Policies Map and shown in map 1. The settlement boundary on the Boundary Review paper as the settlement boundary.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	N/A
4. Proposed Changes	<p>The term “settlement boundary” is not used in legislation or Government guidance on planning. There is therefore no mention of a settlement boundary in a Local Plan to fall within a settlement boundary. It is clearly premature to specify any new settlement plan, and in any case, this is not the purpose of the draft Local Plan.</p> <p>The map on page 65 of the draft Local Plan provides a way forward, because it shows the boundary of the site, rather than the settlement boundary. (i) Paragraph 6.58 needs to be modified as follows: “The new revised settlement boundary will be defined <u>within the ‘Neighbourhood Plan’ in the accompanying map,</u> following the studies and work identified in the policy for a development of at most approximately 100 dwellings at the application stage. <u>The settlement boundary will exclude any country park or public open space on the edge of the development.</u> (added text is underlined)</p> <p>(ii) The settlement boundary on the Policies Map needs to be restored to its current position – along Bath Road and Floral Way. Paragraph 6.58 of the draft Local Plan.</p> <p>(iii) A revision of the document ‘Settlement Boundary Review (SBR) December 2022’ needs to be published, in which the settlement boundary is shown to show the settlement boundary in its current position – along Bath Road and Floral Way.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thattham Town Council is the principal representative body of the community in thattham, and is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the residential development promised in the current Local Plan has not materialised, and would not be delivered if the policies in the draft Local Plan. The Town Council can provide local insight to the development in Thattham, and particularly on the substantial deficit of infrastructure in the local area. I am happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to the allocations are greater than could be addressed through ‘main modifications’. If the Council is minded to consider recommending ‘main modifications’ to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what is required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thattham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thattham Town Council
Agent Full Name	
Agent Organisation	

Comment ID	PS1669
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The emerging draft Local Plan (December 2020) stated at paragraphs 6.12 and 6.13: “... assuming that 1,000 homes are deliverable at Sandlford Park by 2037 (with the remaining 500 in the next plan period.” “This includes the strategic allocation at North West Thatcham for up to 2,500 homes where delivery of at least 1,250 homes is expected over the plan period.” (at that time, the expected plan period was 17 years from 2020 to 2037)

	<p>The Local Plan Submission draft (January 2023) states at paragraph 6.22: “additional housing supply on newly allocated sites ... includes the strategic allocation at North West Thatcham for u period.” (at this time, the expected plan period is 17 years from 2022 to 2039).</p> <p>No justification is provided for the increase from 1,250 to 1,500 in the number of dwellings anticipated to be delivered. The proposals for North East Thatcham are less well developed in 2023 than the proposals for Sandford Park were, and only 1000 of the 1,500 dwellings at Sandford Park could be delivered in the plan period.</p> <p>Policy SP17 expects that numerous Charters, Strategies and Plans will need to be prepared – and approved by Wes before development can commence. None of these were mentioned in the Regulation 18. The preparation of these documents is a significant constraint on the rate of housing delivery.</p> <p><u>The constraints of water supply and treatment on the rate of housing delivery</u></p> <p>The increase in the number of dwellings from 1,250 to 1,500 proposed for the 17 year plan period and the delay in the plan period will increase the rate of increase in demand for water supply and water treatment, compared to SP17 at Regulation 18. In 2018, Thames water said that “the scale of development/s in this catchment is likely to require upgrades of both the water supply and treatment works”.</p> <p>The West Berkshire Water Cycle Study – Phase 2 recommended that West Berkshire Council “Consider the need for additional infrastructure when selecting sites for allocation in the Local Plan Review” and “consider the available Waste water Treatment Works capacity for development going to the same WwTW. Otherwise, the rate of housing delivery might be constrained by the delivery of additional infrastructure upgrades.</p> <p>Paragraph 5.38 of the Duty to Cooperate Statement (January 2023) is only a very superficial comment that does not address the issue is being addressed.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	West Berkshire Council either needs to provide evidence of the deliverability of 1,500 dwellings at North East Thatcham or reduce this housing allocation to what is deliverable (the assessment in the HELAA relied on the opinion of the site promoter).
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thatcham Town Council is the principal representative body of the community in the area. The location of the Strategic Site Allocation is the location of only new strategic site allocation in the draft Local Plan. The need for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the examination of the draft Local Plan, and particularly on the substantial deficit of infrastructure in the local area. The Town Council is happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to the Strategic Site Allocation are greater than could be addressed through ‘main modifications’. If the Council is minded to consider recommending ‘main modifications’ to policy SP17 and related policies, it would welcome the opportunity to provide its perspective on what changes are required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1682
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1682 Thatcham Town Council_Attachment 7_DfE Securing Developer Contributions for Education PS1682 Thatcham Town Council_Attachment 5_School Places Plan 2010.pdf PS1682 Thatcham Town Council_Attachment 6_DfE School Funding Guide.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The viability of the provision of Secondary Education should have been considered as part of the Sustainability Appraisal. Education and skills is identified in the Sustainability Appraisal as a 'Key sustainability issue' under the social category 5 is clearly not an adequate assessment, and appears to have been written without any consideration of the specific impact of the policy. "The policy is likely to have a positive impact on accessibility community services and facilities, including education provision and other services/facilities". The Sustainability Appraisal is clearly not legally compliant, because it does not appraise for Policy SP17 what has been done for sustainability.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based	No

<p>on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Policy SP17 in the Regulation 18 emerging draft Local Plan (2020) stated: “Development of the site will be expected to deliver: A new secondary school (8FE) and the sports infrastructure required to support it.” However, in Policy SP17 of the Regulation 19 consultation, this has been reduced to: “The site will provide: Secondary provision - Land to meet the impact of the development. The nature and cost of the provision will be determined by a feasibility study, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders.” The Thatcham Strategic Growth Study states: “Although the development would only generate sufficient pupils for a 4FE secondary school, any development in the town would generate secondary capacity. When secondary education is looked at in the context of Newbury and Thatcham catchments a secondary school is likely to be necessary. Planned strategic development at this scale is the only approach that is likely to provide for a secondary school for the town, without which any growth would cause issues in provision.” If a development of 2,500 dwellings would ‘generate’ sufficient pupils for a 4FE secondary school, then a development of 1,250 dwellings would generate sufficient pupils for 2.5FE. Therefore the statement in the Regulation 19 Policy SP17 is equivalent to providing for a 2.5FE Secondary School. This is below the minimum viable size for a Secondary School. The West Berkshire Council School Places Plan 2010 states (paragraph 1.24): “In respect of major new housing developments and where the indicated pupil numbers warrant, the Council’s policy is to provide a secondary school large enough to yield viable secondary school, a six form entry secondary school will be considered as a minimum number of forms to create surplus places” This is provided as Attachment 5, and is available online at: (retrieved 20/02/2022) <See attached document PS1682 Thatcham Town Council Attachment 5_School Places Plan 2010> The Department for Education’s ‘A guide to new mainstream free school revenue funding 2022 to 2023 (June 2022)’ states: “The department will need assurance that free schools are on-course to be financially viable on opening. In order to ensure a balanced curriculum, there is a presumption that ... secondary provision (years 7 to 11) have a minimum of 4 forms entry. Financial plans are not expected to be based on fewer pupil numbers unless otherwise agreed with the department.” This is provided as Attachment 6 (see attached document - PS1682 Thatcham Town Council Attachment 6_DfE School Places Plan 2022 to 2023) online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1081008/A_guide_to_new_mainstream_free_school_revenue_funding_2022_to_2023.pdf The provision in SP17 for “Secondary provision - Land to meet the impact of the development” cannot lead to the provision of a secondary school. It is inconsistent with West Berkshire Council’s own policy for secondary education, and would not receive funding. The Town Council notes Policy SP17 also states that “proposals will demonstrate that these guiding principles [of the NPPF] have been positively responded to, and that this states that “a 6-8FE secondary is likely to be necessary”. The two provisions are contradictory. Thatcham is served by two secondary schools: Kennet School for the east of the town and Trinity School in Newbury. The Council understands that both schools are currently at full capacity, and Trinity School may in addition need to accept pupils from the proposed development that is currently under construction. The site of Kennet School is constrained, and incapable of expansion. There is no provision to serve the expected number of secondary pupils of the proposed development. The Strategic Growth Study estimated the provision of a secondary school would cost £26.4 million, which forms part of the Infrastructure Delivery Plan of October 2021 for secondary education places (including both NE Thatcham and Newbury). The Infrastructure Delivery Plan of January 2023 only has a figure of £5,027,613. This cannot be the cost of a new secondary school, as the cost of provision for secondary pupils from non-strategic sites. The Infrastructure Delivery Plan is therefore inconsistent with the Council’s policy is silent on how the building costs for a secondary school would be funded. Policy SP17 therefore does not meet the requirements of Paragraph 95 of NPPF. Policy SP17 is therefore completely unsound in relation to provision of secondary education.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A

<p>4. Proposed Changes</p>	<p>It is clear that the SP17 development will not create a sufficient number of secondary pupils to support a viable secondary development. West Berkshire Council therefore needs to review the provision of secondary education in the light of construction in the Newbury and Thatcham area and those proposed in the draft Local Plan. A key element of this review is to work with the Academy Trusts for the two local secondary schools.</p> <p>The Department for Education has published guidance on “Securing developer contributions for education (November 2019) advice on ‘Safeguarding land for schools’. Paragraph 23 is especially relevant to the development of a Local Plan:</p> <p>“You may wish to safeguard additional land when new schools within development sites are being planned, to allow for the reconfiguration of schools to create a single site. ‘Future-proofing’ can sometimes be achieved informally through space adjacent to a school site. Where there is a forecast need for new school places that is not linked exclusively to a development plan can allocate specific areas of land for new schools or school expansion, and safeguard specific parcels of land for education use. Safeguarded land within larger site allocations can be made available for purchase by the local authority at a later timescale, after which the land may be developed for other uses.”</p> <p>This could be achieved through the addition to the Policies Map of a specific category of “Land Safeguarded for Education” area for a viable secondary school. As the catchment area of this school is likely to include parts of Thatcham, and particularly the optimum location for this is likely to be at the western end of the development.</p> <p>This guidance is provided as Attachment 7 (<i>See attached document - PS1682 Thatcham Town Council_Attachment 7_Contributions for Education</i>), and is available online at:</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909908/Developer_Contributions_Guidance_update_Nov2019.pdf</p> <p>To make the Local Plan Review sound, it must include the provisions for a viable secondary school. The specific nature of the review on the outcome of the review called for above, which forms part of the required scope of the Sustainability Appraisal.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community in the area. The location of the Strategic Site Allocation is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the requirements promised in the current Local Plan has not materialised, and would not be delivered under the policies in the draft Local Plan. The Town Council can provide local insight to the review of the draft Local Plan, Thatcham, and particularly on the substantial deficit of infrastructure in the local area. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through ‘main modifications’. If the review is minded to consider recommending ‘main modifications’ to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what is required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Thatcham Town Council</p>
<p>Consultee Full Name</p>	<p>Ms Mel Taylor</p>

Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1646
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>“(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible person shall prepare, and submit to the authority, a report containing the following information:—</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.</p> <p>The SA/SEA Environmental Report states:</p> <p>“The Core Strategy had a focus on Newbury and Thatcham, with two strategic sites allocated in Newbury and smaller sites in Thatcham. This mix of strategic and smaller sites across the district worked well for the Core Strategy by providing a range of sites for different types of developments across the plan period. As a result a similar mix of sites is considered to be appropriate for the LPR with strategic sites in Newbury and Thatcham and smaller sites in Thatcham.</p> <p>Regulation 12 requires the identification, description and evaluation of ‘reasonable alternatives’. If an approach works well it does not follow that it is the best approach for the following plan period – and it is certainly does not follow that there are no other alternatives.</p> <p>It is incorrect for the SA/SEA to assert that the approach in the current Local Plan has ‘worked well’ by providing ‘natural alternatives’ across the plan period. This is certainly not the case for the Sandleford Strategic Site Allocation. Policy CS3 of the current Local Plan states:</p> <p>“Within the area identified at Sandleford Park, a sustainable and high quality mixed use development will be delivered in accordance with the following parameters:</p> <p>Phased delivery of up to 2,000 dwellings, of which at least 40% will be affordable and with an emphasis on family housing; and</p> <p>planned to be delivered by 2026;”</p> <p>However, as the SA/SEA explains (pages 35-37): “no work has started at the site at Sandleford, with outline planning permission for the site only granted (on appeal) in May 2022.” The site has been re-allocated “as a single site for up to 1500 dwellings on the site allowed for better consideration of the constraints on the site (Ancient woodland, drainage, land ownership) for adequate and appropriate mitigation measures to be put in place.”</p> <p>The SA/SEA states (page 25, below the table):</p> <p>“Following the decision that the spatial strategy should focus on Thatcham, strategic site options were considered, based on the February 2020 HELAA.”</p> <p>Therefore, ‘reasonable alternatives’ that are not around Thatcham were not considered. This decision was also based on the fact that the town of Thatcham would have sufficient infrastructure to support this development, either at the time of the decision or through the delivery of Sandleford Park. The lack of infrastructure in Thatcham is addressed by other representations of the Town Council.</p> <p>The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policy SP1 cannot be legally compliant as it has not complied with the requirement to identify, describe and evaluate reasonable alternatives to the proposed policy. The lack of infrastructure in Thatcham and the delay in delivery of Sandleford Park in the current plan period (described in paragraphs 6.44 – 6.46 of the draft Local Plan) and the delay in delivery of dwellings from 2,000 to 1,500, suggest that the proposed policy for North East Thatcham is not even the best alternative.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>As explain in Section 1 above, the draft Local Plan explicitly states that no alternatives have been considered. The expected number of houses at the Sandleford Strategic Site Allocation to deliver the expected number of houses suggests that relying on two strategic sites) is not even the best approach.</p> <p>As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	A new Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) needs to be undertaken, which could inform the decisions relating to strategic sites and proposed approach of Policy SP1.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of the site allocated in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. We would like to provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the area. We would like to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as set out in our representation. The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP1, we would welcome the opportunity to provide its perspective on what modifications would be required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Harris, Sarah
Consultee Full Name	Ms Sarah Harris
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1241
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Nature there would be a huge impact on legally protected wildlife. Great crested newts, badgers, nightjars, slow worm area, development would put them under significant threat. There are no sufficient mitigation measures or evidence promise of a country park is not a replacement for countryside. We now see that there is no country park but only in direction of how biodiversity would be enhanced. This shows WBC lack of commitment to protect the natural environment.</p> <p>Additional cars and people will be entering the AONB which will have a detrimental impact, there is no clarity on what WBC will do to protect and enhance the natural beauty, in fact it seems traffic will be directed into the AONB instead of away from it.</p> <p>Traffic –</p> <p>As WBC predict that there will be some displacement of A4 traffic onto wider rural routes such as upper Bucklebury has not been fully considered. We live down <redacted>, walking down the road with no pavement and down Broad Lane which is already dangerous. We strongly fear for our safety and feel it's only a matter of time before there is a serious accident can be hair raising during school pick up and drop off times. Our preferred method to get to school is walking, however the risks that will only be worse with increased traffic through the village.</p> <p>The studies conducted by WBC so far do not agree with an independent study by Yes Engineering. This found that; the studies are unreliable and not robust, the trip distribution is unrealistic, the mitigation measures are improbable at best, the local travel will dominate. The highway network in the vicinity of Thatcham Northeast is already over capacity and there are the routes most likely to be affected by an increase in traffic.</p> <p>Education –</p> <p>There is not a clearly defined planned schools provision. This breaches the councils obligation to provide education for all is untenable. Our children currently go to Bucklebury Primary School with a view to carrying on their education at Kennet and contradictory information on the provision of secondary schools in and around Thatcham. It seems unlikely that a provision is provided.</p> <p>Identity-</p> <p>There is simply not enough space between the proposed development and Upper Bucklebury. There should be clear boundaries would be lost with this development and Upper Bucklebury will become part of the Newbury/ Thatcham conurbation. I strongly urge you to reconsider the plans, reduce development or find alternative sites that are more suitable and in</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Grincell, Patrick
Consultee Full Name	Mr Patrick Grincell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1112
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based	

on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
 * Yes
 * No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

Objection to West Berkshire Council Local Plan Review 2022-2039 Regulation 19 Consultation

I wish to register my ongoing objection to the proposals set out in the West Berkshire Council (WBC) Local Plan Review Draft (LPR). I consider that the approach taken by WBC in the preparation of the LPR is flawed, conflicts with key requirements of the National Planning Policy Framework (NPPF), and as such, there are elements of the Plan that are unsound.

This submission follows on from my objections made to the previous draft of the LPR in February 2021. This raised a particular objection to Policy SP17 and the proposed development of the North Eastern Thatcham (NET).

My previous objection is acknowledged in the WBC Consultation Statement and given the reference lpr2035. However, the response provided by WBC is wholly inadequate as it fails to address appropriately the objections made. The objections remain valid, and I request that they are considered alongside the further points I raise below.

I have set out my further objections under the following headings:

1. Need for the Development;
2. Environmental Impacts;
3. Transport Impacts; and
4. Socio Economic Impacts.

Need for the Development

WBC has proposed revision of the number of homes for the NET development to approximately 1500 in the Plan period, a reduction from 2500 when in effect it is an increase in the Plan period from the previously stated 1250. The 1500 number is an approximate number and the supporting studies are still based on an eventual size of 2500 dwellings. The number has not changed and if there is a 40% reduction in housing numbers, I would expect that there should be commensurate reduction in allocation. It follows that the implication is that the remaining 1000 homes will come forward in the next Plan period. This is a significant reduction.

LPR Policy SP1 suggests that *Thatcham will be a focus for regeneration, for new housing and for improved provision of services*. Investment in the centre of Thatcham is welcomed, but initiatives that have the support of the Town Council should be in accordance with Policy SP17. There is no evidence provided that this urban extension will have any benefit for the town centre or detract from the centre if new facilities are delivered within the SP17 development as proposed. SP1 continues that *maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements in accordance with Policy SP17*. This directly contradicts this ambition, with outward sprawl detracting from the town centre and generating unsustainable development. The greatest detriment will be the effective merging of Thatcham with Upper Bucklebury destroying the character of both.

As I set out in my previous objection, I consider WBC should revisit its assessment of housing need. There are a significant number of sites that should be prioritised for development as opposed to the entirely greenfield development at NET. The allowance for development is very cautious and this should be higher, further removing the need for the NET allocation. The updated Land Availability Assessment (HELAA), published in January 2023, includes a large number of sites that have been discounted which have been discounted. This does not provide a robust basis for the assessment of the housing need that underpins the LPR.

Paragraph 35 of the emerging draft of the NPPF states that Local Plans are ‘sound’ if they are Positively prepared – minimum, seeks to meet the area’s objectively assessed needs so far as possible, taking into account the policies in the NPPF. Particular reference is made to Paragraph 61 which states that the outcome of the standard method is an advisory statement on housing requirement for the area... There may be exceptional circumstances relating to the particular characteristics of the area which justify an alternative approach to assessing housing need.

In December 2022, the Secretary of State (SoS) issued a Written Statement that effectively removed the need to maintain up-to-date Local Plans, removed top-down housing targets (particularly for Local Authorities with a housing need) and gave a two-year transition period for LAs in the final stages of preparing Local Plans. A number of other Local Authorities have revisited their Local Plans. WBC should do the same to allow time for it to review the LPR thoroughly and arrive at a sound and less damaging set of proposals.

Environmental Impacts

As I highlighted in my previous objection, if delivered, even in a reduced form, the proposed SP17 allocation would pose significant environmental threats which include:

- Permanent damage to the Bucklebury Plateau Biodiversity Opportunity Area and its ancient woodlands and heaths
- Developing on a large swathe of farmland and green space that will have a damaging effect on the broader landscape
- Ruining Downs AONB that will forever ruin the open countryside for the local communities; and
- Causing harmful impacts to legally protected wildlife known to be present on the site without appropriate mitigation

WBC has clearly paid insufficient attention to these environmental impacts. Its suggestion that the provision of SAP17 and the provision of a community park will have a positive impact is clearly flawed. The reality is that SP17 will have

The LPR that a Sustainability Charter is required to establish how *'policy requirements will be achieved'* (including the gains and the anticipated overall positive impact on environmental sustainability). WBC maintains that the Charter 'will be included in the strategy documents (including one on ecology). However, the strategy documents either do not exist or have not been made public since the 2019 consultation.

Even at a capacity of 1500 homes the population of the new SP17 development would be around 4,000 people. This development space needs which are unlikely to be provided for on-site alone with the vague reference to a 'community park'. As such, those visiting them will inevitably be spill-over into adjacent areas.

The LPR acknowledges this stating that the intent for SP17 is to focus people into the AONB by suggesting that it will be a network which will *'take advantage of the landscape'* to *'facilitate connection to the AONB and include leisure routes'*. This is a direct contradiction with the management vision for Bucklebury Common which is explicitly focused on not increasing the number of ecosystems they are working to restore and nurture.

WBC's Sustainability Appraisal for the LPR accepts that SP17 will have a negative impact on environmental sustainability and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated. However, it does not state what this mitigation might be, and it is simply unacceptable to leave this to chance in the hands of the developers.

For the reasons outlined above, I consider that the LPR is in direct conflict with the NPPF and paragraph 117 that strategic decisions should contribute to and enhance the natural environment.

Transport Impacts

The NPPF at Paragraph 104 states that transport issues should be considered from the earliest stages of plan making and that: *'the potential impacts of development on transport networks can be addressed'*. In preparing the LPR, I consider that WBC failed to meet this key requirement of the NPPF.

As I referred to in my previous objection the proposals included within Policy SP17 will generate significant amounts of traffic. This is particularly the case for vehicle movements on to the local highway network, including the narrow road that passes through Upper Bucklebury. WBC suggest that traffic from the NET development will be directed to the A4, it also acknowledges that there will be an impact on surrounding lower order roads such as Broad Lane passing through Upper Bucklebury. With a new population of circa 4,000 people, at least that number of new car movements on the road network and to suggest that this will not be the case in this local area is unrealistic. Of this, there will be the inevitable additional traffic created by those visiting or servicing the development.

The inclusion of the new junction proposed on Harts Hill linking the new development is a clear demonstration that it is not to be diverted in that direction and onto a road that passes through Upper Bucklebury that is simply inappropriate for this development. This road is inadequate, without pavements and has the potential for serious accidents. Significant disruption from an increased number of additional queuing through the village, which in turn will inevitably cause increases in air pollution, which will directly impact on the quality of life of Upper Bucklebury.

I consider that the air quality assessment prepared by WBC fails to address this. Furthermore, the document is now out of date as the LPR running to 2037, not to 2039. This affects the traffic levels forecast for the end of the LPR period and the results of WBC's high level Transport Assessment that underpins the LPR states (Paragraph 3.26) that the modelling undertaken for Harts Hill Road *suggests it will not cause problems*. However, these modelling results are not provided nor are any details of the assessment. The lack of certainty here is very worrying, so too is the lack of any detailed assessment of the significant impacts that the development will have on the road network and the lives of the existing residents of Upper Bucklebury.

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the LPR Plan covers the impact of Policy SP17 against key Sustainability Objectives. Objective 4 is to *promote and maximise opportunities for all forms of safe and sustainable travel*. WBC concludes that the policy is likely to have a *Positive Impact on road safety as safe travel*. This assessment is fundamentally flawed as the *introduction of great volumes of additional traffic onto unsuitable local roads will have a significantly adverse impact on road safety in Upper Bucklebury*.

The possible siting of a secondary school in the proposed NET development would result in a significant increase in traffic in the area. This has not been considered in the traffic plans and models in the LPR.

In addition to the challenges faced through Villages like Upper Bucklebury, there will inevitably be further congestion at the key junctions in the area. A major bottle neck currently is the crossing at Thatcham train station. There is nothing in the LPR that seeks to address this and so the proposed development of at least 1500 new homes and the significant additional traffic will exacerbate the problem.

WBC's failure to address this is a major failing and demonstrates its lack of understanding of the issues facing the residents of surrounding Villages such as Upper Bucklebury which it would be aware of if it had engaged constructively with existing residents. This is such an ill-conceived, unsustainable, and damaging proposal though through the form of Policy SP17.

Socio-economic impacts

Healthcare provision

The Policy SP17 proposes a 450 sqm primary healthcare facility but there is no clear proposal for how this will be delivered into the existing healthcare network. A major development such as that proposed by SP17 is likely to have a significant impact on the existing healthcare network. It should from the outset be informed by a detailed Health Impact Assessment (HIA) in accordance with the current guidance. A HIA should include detail how the proposals for development have been discussed with health service providers regarding primary care services and the development proposals should demonstrate how the conclusions of the HIA have been considered to ensure it can be appropriately accommodated and to ensure that an unacceptable impact on the health and wellbeing of the community will not be permitted. I am not aware that such an HIA exists and the absence of such a key document is a key failing of the proposal.

The proposed NET development is covered by three existing medical practice boundaries, Thatcham Medical Practice, Thatcham Row surgery. All three practices are already overstretched. The two Thatcham doctors' surgeries run independently and their patient lists include approximately 27,800 patients that equates to just under 2,000 patients per GP. New residents of NET will place additional demand on GP services that the existing practices could not cope with. NHS England commissions few new GP practices, even in areas of high patient demand for improved services. There is a chronic shortage of shortage of GPs nationally and I understand from my experience with the NHS Berkshire West Clinical Commissioning Group (CCG) that this position is even worse here than in other areas.

Now more than ever, GP practices need to create efficiencies and economies of scale to make general practice more sustainable. It is not in the interests of the community to increase access and extend the range of services and primary healthcare professionals available on a single site. It would be in the best interests of the community for an existing local GP practice to set up a branch surgery on the proposed new development rather than the associated with such a move.

It is also likely to be unviable for one of the existing GP practices to relocate even to an expanded practice in NET. It would displace the surgery away from its existing patients creating greater travel demands. It is therefore highly unlikely that such a practice would be established or operated sustainably as part of the NET development.

A further healthcare issue is that the existing dental practices in Thatcham are unable to provide care for the whole population of patients needing to travel further afield for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016

	<p>were registered at a Thattham dentist (with 17.5% registered with a doctor outside Thattham). There is no evidence on local dental practices regarding the potential impact of increased patient numbers resulting from additional housing. The proposal to include 450 sqm primary health facility within Policy SP17 appears to simply be a mathematical exercise of critical importance. The failure to prepare an appropriate HIA nor consult appropriately with the exiting community is a fundamental failing of the LPR and the proposed Policy SP17. The impact an additional 4000 plus new patients has simply not been appropriately considered or mitigated for against a backdrop of an already struggling NHS service.</p> <p>Schools Provision</p> <p>The NPPF (Paragraph 97) states that <i>'it is important that a sufficient choice of school places is available to meet the needs of communities.'</i> It is therefore incumbent on WBC to comply with these requirements of the NPPF. However, the provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly set out. There is no coherent plan set out for how the children from the NET development will be educated. Without this provision, the provision of 4000 new residents to the area is both untenable and fails to comply with the requirements of the NPPF. There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 merely states that 'the provision for primary school education is also unclear and contradictory and there is no information on the provision of school entry requirements. Draft Policy SP17 suggests that a 2.5 FE primary school on site and sports infrastructure to be provided, but the only obligation on the developer is to provide the land and the build costs, which is some way of meeting the need for a school. The reality is that there is likely to be a significant funding gap which must question the deliverability of the project. The needs to be in place before a development is occupied and there is no evidence that this will be the case.</p> <p>The LPR is again unclear, and contradictory on the provision of secondary schooling. Draft Policy SP17 suggests that the land to meet the impact of the development, but that the nature and cost of the mitigation will be informed by a feasibility study of applicants' expense, and prepared in collaboration with the Council and local stakeholders. There are no details of the cost and hence no possibility of assessing its suitability. By leaving the confirmation of actual requirement for the provision of secondary schooling in due course, WBC is failing in its duty to ensure that sufficient school places exist. This is a fundamental requirement of the NPPF. Policy SP17 refers to the provision of sports fields within the NET development, but there is no obligation for this to be provided. The location is not identified, and no funding is earmarked for the delivery of the facilities. The existing sports facilities in the area are limited and availability for local teams is limited. The introduction of an additional 4000 plus new residents will compound this issue. The school playing fields could also be available as public sports field but, not only is this questionable because of safety and group issues, it is the case that the secondary school is unlikely to be delivered and as such the playing fields will not be available.</p> <p>Conclusion</p> <p>For the reasons outlined above and as set out in my previous objection, I am opposed to several of the policies and particularly Policy SP17 and the proposed NET development. I consider aspects of the LPR to conflict with the NPPF and as such I would like to take the opportunity afforded to it by the SoS to pause the LPR process and to review its approach.</p> <p>I reserve the right to follow up on these objections should further information become available, and I wish to have the opportunity of a public inquiry that might be held to consider the LPR. In the meantime, I would be grateful if these objections could be taken into account and I am informed of any further progress with the LPR.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As I set out in my previous objection, I consider WBC should revisit its assessment of housing need. There are a number of sites that should be prioritised for development as opposed to the entirely greenfield development at NET. The allowance for residential development is very cautious and this should be higher, further removing the need for the NET allocation. The updated Land Availability Assessment (HELA), published in January 2023, includes a large number of sites that have been identified which have been discounted. This does not provide a robust basis for the assessment of the housing need that underpins the LPR.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Slatford, Tim
Consultee Full Name	Tim Slatford
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1516
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As a resident of Upper Bucklebury I would like to OBJECT to the SP17 proposal as contained in the WBC LPR. I would like to refer back to the Regulation 18 consultation, as very little appears to have changed in the WBC mindset from that time. I would like to see a change in this time. The plan is unsound because:</p> <p>Traffic. There will be a significant, and potentially dangerous, increase in the traffic on the rural roads through Bucklebury from the site onto Harts Hill, and traffic modelling carried out for Bucklebury Parish Council (BPC) shows that significant traffic will be displaced from major roads onto wholly unsuitable rural roads. WBC assesses that there will be some displacement of traffic but this will have a positive impact on road safety. Given the nature of these roads it is hard to reconcile a vastly increased traffic flow with a positive safety impact. Traffic flows over areas such as the Thatcham level crossing, through the village, and A34 will just cause gridlock in all areas. The proposal offers no plan as to how this traffic will be mitigated, nor how it will be managed. The plan falls dramatically short in this area.</p> <p>Healthcare. There is no detail into strategic healthcare planning included in the proposal. Given the development's proximity to the town, it should include a Health Impact Assessment (HIA), but this does not appear to have been completed. There is little chance of a new practice being commissioned, so the households within the site will have to be merged into already overstretched local practices. The plan as to how this integration would be successfully achieved. A similar overstretch exists within dental practices in the area, but the plan fails to address any form of primary healthcare provision requirement, and is woefully inadequate in this area.</p> <p>Environment. The proposed site will cause permanent damage to the Bucklebury Plateau Biodiversity Opportunity Area, and development in the setting of the North Wessex AONB, and cause detrimental impacts to legally protected wildlife. The plan fails to mitigate these far reaching and irreversible effects, and the LPR's own sustainability appraisal accepts that SP17 will be detrimental to environmental sustainability. It is shameful that WBC entertain a proposal with no concrete mitigations for the development, and does nothing to meet legal requirements to improve biodiversity aspects.</p> <p>The management vision for Bucklebury Common necessitates the minimising of extra human pressures upon it. By the nature of the site, it will necessarily cause an overspill of people to reek havoc with the fragile ecosystems of the Common. The site would be a significant loss of the AONB, and there appears to be no strategy to meet the requirement to achieve the required biodiversity net gain. The plan fails to protect the environment generally, and in legally required areas to improve biodiversity. There is no evidence of a plan to analyse and address the consequences of this proposal. It is completely unsound in this area.</p> <p>Education. There is no end to end plan for education within the plan. The plan does not provide evidence of the education plan, school location, the number of Form Entries at any school, timing of funding, and whether any funding is sufficient to provide education.</p> <p>It appears that less than a 6FE school is unsustainable, so it not clear as to what the education plan is. The current provision is not for enough houses to justify a new secondary school, so pupils would have to be crammed into already overstretched facilities to add to Thatcham's education problems rather than provide any form of answer. It is sadly laughable that the plan fails to consider demographic predictions for education demand, or predictions of the long term capacities of local schools. Obviously, the associated facilities (such as sports fields) would also not be available to the community, leading to another failure of the SP17. WBC has a duty to make arrangements for suitable school provision. The proposal fails to provide evidence of a plan to meet. As such, the plan is unsound in another major area.</p> <p>Removal of the Strategic Gap. Until this proposal was tabled, the land north of Floral Way has provided the gap between Bucklebury and Thatcham, and breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. WBC plan to grant planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the AONB, and does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the area.</p> <p>The strategic gap between Bucklebury and Thatcham is an important one. Bucklebury is a rural parish within the AONB, with Floral Way the boundary between them. WBC policies require the maintenance of these as separate entities to maintain this feeling of separateness. The mitigations included in the proposal are ultimately meaningless and ineffective in maintaining the rural settlements. As Upper Bucklebury is lost into Thatcham, so too is the edge of the AONB. The proposal is unsound because it fails to protect the rural environment and specifically fails to protect the setting of the AONB.</p> <p>Site selection. All through this 'process' there has appeared to be different criteria applied to different sites. The process has been flawed and is marked by U-turns, confused thinking, and making a developer-led 'solution' fit. The Site Selection Background Report for the Core Strategy was clear that Thatcham was to receive a lower allocation than other Urban Areas given the rapid expansion of the town over recent years. This was to allow a period of consolidation, ensuring the infrastructure and town centre facilities could meet the demands of the existing population." Was this assessment completely wrong, because suddenly there is a requirement for a new site in Thatcham?</p> <p>WBC were obviously left blindsided by the failure of the Grazeley proposal, but it appears that rather than thoroughly evaluate the developer-led proposal at Thatcham North East was seen as the answer to all the problems. Never mind the damage to the AONB, its lack of suitability on almost all fronts, and the WBC strategies that would have to be ignored for it to be taken forward, the plan to see this site as the answer to their problems.</p> <p>The entire site selection process appears flawed throughout. Suitable sites have been ignored or discounted, whereas sites that have been ignored when Thatcham North East has been considered. There are numerous examples within the SSBP where sites have been "not considered for allocation" because of traffic, AONB, environmental, and flooding reasons. As each of these points relate to small scale issues, it is unreasonable to assume that give the proposed size of the development within SP17, the size of the response and the number of sites to be proportionately larger. Instead the report on the Thatcham North East site simply states that there are very few sites that would be suitable for the site would have.</p>

	<p>Thatcham North East would have disproportionately larger adverse effects than the sites discounted during the selection process. These sites have just been glossed over. One only has to consider proposed site THA9, where there were concerns that development in the countryside between Thatcham and Newbury / Greenham, and introduce built form to south of Lower Way, as the site for development would not be appropriate in the context of the existing settlement form and character of the landscape. The objections were not written relating to Thatcham North East, in the context of Thatcham/ Upper Bucklebury, built form to the north of the buffer to development, and development being inappropriate to settlement form and landscape character. These concerns are noteworthy for a 36 house development, but were not mentioned for a multi-thousand house one.</p> <p>This confused thinking is prevalent throughout the plan process. In 2015, WBC were, rightly, relentless in their argument that the Siege Cross would have an adverse effect on the local area. It is somewhat strange that, as Thatcham was to be left alone, the Siege Cross would be badly affected by 500 houses, but a multiple in the same vicinity would now be beneficial.</p> <p>To the layman, the site selection process appears woefully inadequate in its execution. The criteria used appear not to be relevant. The only reasonable conclusion is that WBC has chosen an answer to its perceived housing problems, as put forward in the plan, and that any sensible evaluation process appears to have been ignored. The plan again is unsound in its strategic objectives.</p> <p>For me as an individual, execution of the SP17 proposal would have devastating effects on the Bucklebury area. The plan would create a gridlock on the major routes, and local roads would then be unable to accommodate the overspill from those major roads. This will reduce the impact of traffic through the local villages.</p> <p>The Common itself and its delicate ecosystems will just become overrun. Its species and biodiversity will never cope with the loss of the separate village community of Upper Bucklebury. As the strategic gap is removed, so the rural AONB village will be subsumed into the urban environment of Thatcham. The village might have some limited separation but it will become part of Thatcham.</p> <p>All these elements should be protected within the frameworks that WBC works to, but to its shame they appear converted into housing. This is unsound, and should be confined to history.</p> <p>On 6th December 2022, the Secretary of State for Housing and Communities detailed that the housing number should be a target point and not be mandatory, and that Planning Inspectors should no longer override sensible local decision making in the face of local constraints and concerns.</p> <p>The NPPF consultation which ran until yesterday also focused on the need to take into account the character when planning to accommodate housing. Many sensible local authorities paused their plan making process accordingly. It would make no sense as this proposal might be trying to fit, and appearing to do so badly, a need that is no longer present.</p> <p>In summary, I would like to lodge my objections to the SP17 proposal. The NPPF requires that “great weight must be given to the landscape and scenic beauty in Areas of Outstanding Natural Beauty” and “local wildlife-rich habitats should be protected from irretrievable damage to the local area, its wildlife, and the AONB. Roads would become gridlocked, and education and health services and inadequate at the very best. I urge WBC to reconsider this unsafe plan. It is unsound in too many areas with too many objections.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1338
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	S Pike Attachment 1 - Landscape Sensitivity and Capacity Study REDACTED.pdf S Pike Attachment 2.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Landscape Capacity Assessment</p> <p>[Representation part of a wider rep for SP17]</p> <p>[See attached documents Attachment 1 and 2]</p> <p>The evidence base for this Regulation 19 consultation includes a total of 33 Landscape Capacity Assessments prepared. Of these reports were prepared by Liz Allen EPLA on behalf of West Berkshire Council. The exception is the 'Landscape Capacity Assessment for Land North East of Thatcham', which was undertaken on behalf of David Lock Associates by Lloyd Jones.</p> <p>The report states that David Lock Associates are "planning consultants appointed to West Berkshire Council". This is the Thatcham Strategic Growth Study for the Council. However, it DOES NOT say that West Berkshire Council commissioned a Landscape Capacity Assessment. This is confirmed by the response to a Freedom of Information request that I made to the Council on 11/01/2017 in relation to these representations. The reasoning why West Berkshire Council did not commission or fund the Landscape Capacity Assessment is that the information provided in the response indicates that the Council was only involved in the final review of the draft report.</p> <p>Paragraph 2.12 of the report includes a curious statement:</p> <p>"The project brief requires the visual sensitivity of the study site to be considered as a single tract of landscape, and not broken down into individual parcels of land." It is difficult to understand why this should be an explicit requirement of the study.</p> <p>David Lock Associates has a potential conflict of interest in relation to this study; it had already pre-determined its view on the site through undertaking the Thatcham Strategic Growth Study for 2,500 dwellings, which was funded by the proponents of the Landscape Capacity Assessment not to be broken down into individual parcels of land masks the proportion of the site that is suitable for its capacity.</p> <p>Paragraph 1.12 of the report in the section 'Determination of Landscape Capacity within the Site' states:</p> <p>"Because the project brief requires the sensitivity of the study site to be assessed as a single tract of landscape, rather than sub-components, no attempt has been made to plot variability of landscape capacity within the study site boundary, although this is present and is a constraint that should inform design. It will be down to individual applicants to assess the capacity of their site in relation to individual planning proposals, should the land be brought forward for development."</p> <p>The statement in the second sentence is true for West Berkshire Council as well as applicants.</p> <p>The conclusion of the report, given in paragraph 1.7, is:</p> <p>"Having followed the template methodology, and made judgements concerning landscape and visual sensitivity, and the value of the landscape value, this exercise has concluded that overall the study site THA20 has a Medium Capacity. This is defined as follows: 'The landscape could accommodate areas of new development in some parts, providing it has regard to the setting and the character and sensitivity of adjacent landscape character areas. There are landscape and visual constraints and visual characteristics must be retained and enhanced.'"</p> <p>This is obviously inadequate to assess whether the site does indeed have a capacity of 1,500 dwellings, or how they would be distributed. West Berkshire Council has commissioned studies of landscape capacity for a substantial part of this site in relation to the application for Siege Cross. The summary of Statement of Case of West Berkshire Council's expert witness on landscape capacity and constraints of development of this site, and is provided as Attachment 2 to my representations.</p> <p>This document is available online at:</p> <p>http://planning.westberks.gov.uk/rpp/showimage.asp?j=15/00296/OUTMAJ&index=1175645</p> <p>REASONING ON FREEDOM OF INFORMATION REQUEST</p> <p>The freedom of information request explicitly requested "Information relating to the procurement of this study, including the tender response and the value of the contract; or if the study was not procured by competitive tender, the equivalent documentation".</p> <p>Clause 1 of the Freedom of Information Act 2000 states:</p> <p>"General right of access to information held by public authorities.</p> <p>(1) Any person making a request for information to a public authority is entitled—</p> <p>(a) to be informed in writing by the public authority whether it holds information of the description specified in the request;</p> <p>(b) if that is the case, to have that information communicated to him."</p> <p>This right of access is subject to a number of exemptions but, if these are invoked, the person making the request must be informed in writing in the response does not refer to any exemption, so this must in law be interpreted that none of these exemptions apply (and that any of them would apply to the information requested apart from a few redactions).</p> <p>The response to the freedom of information request does not explicitly state if the Council holds the information. However, the Council has a duty to provide the requested information unless one of the exemptions apply. Therefore, the facts that the information requested was not provided and exemptions were invoked must be interpreted in law as meaning that the documents do not exist.</p> <p>If "Information relating to the procurement of this study, including the specification, the successful tender response and the equivalent documentation" does not exist, then the Council cannot be said to have played any part in its definition.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>West Berkshire Council needs to commission a Landscape Sensitivity and Capacity Assessment that provides enough information on landscape capacity across the site and its sub-components to inform a Landscape and Visual Impact Assessment (LVIA) of the total capacity.</p> <p>The wording of Policy SP17 needs to be amended as follows:</p>

	<p>The LVIA will be informed by a Landscape Sensitivity and Capacity Assessment <u>that considers variability of landscape</u> Landscape Sensitivity Assessment (2021) of the site. <i>(added text is underlined; deleted text is struck through)</i></p> <p>Until there has been a quantitative Landscape Capacity Assessment for the site, Policy SP17 should not specify a n</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	If it would assist the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hindocha, Atul (Represented by Iver Consulting Ltd)
Consultee Full Name	Atul Hindocha
Consultee Organisation	
Agent Full Name	Huw Williams
Agent Organisation	Iver Consulting Ltd
Comment ID	PS1671
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 13:02:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	Yes
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a</p>	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>NPPF clearly states Brownfield sites to be brought forward for development prior to the release of greenfield sites</p> <p>Thatcham has been identified for strategic development with a major greenfield release. Brownfield sites have been brought forward prior to the release of greenfield sites in Thatcham</p> <p>Re-use of brownfield sites prior to the release of greenfield land for development</p> <p>It is a requirement of all Local Authority's to seek the re-use of brownfield sites prior to the release of green field sites is particularly so when sites such as the former Newbury Leisure Park are redundant and available for development.</p> <p>Significant releases on greenfield sites are being proposed in the Thatcham area which should only occur once all plots have been utilised. With the omission of our site the Council have failed to do this and should review their allocations</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	The total number of residential dwellings of 1500 proposed should be offset by plots being delivered from brownfield
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	The use of brownfield sites prior to greenfield release should be a fundamental objective of the local plan which need therefore wish to have a seat at the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1707
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	There are several inconsistencies between Policy SP17 and the map on page 65 of the draft Local Plan, and unexplained: 1) Policy SP17 states that the Green Infrastructure will include “A new community park linking Thattham to the North East” but the map shows three small and disconnected areas described as “Country Park / Public Open Space”. These are close to the AONB contour, rather than their relationship to the AONB. 2) The purpose of the car park on Harts Hill Road is unclear, and conflicts with the policies in the draft Local Plan to not have a car park on a blind bend on Harts Hill Road. 3) The “Green linkages between Country Park / Public Open Space” are not mentioned in Policy SP17, and their purpose is unclear. They are for wildlife or pedestrians. If they are for wildlife, then the wildlife pass through Long Grove Copse (between Siege Hill and the AONB) rather than all the way round its periphery. 4) The three areas of “Country Park / Public Open Space” and the “Green linkages between Country Park / Public Open Space” are not mentioned in the description of ‘Green and Blue Infrastructure’ that are described in paragraphs 4.8 – 4.14 of the Thattham Strategic Site Allocation. Policy SP17 states “provides guiding principles for the delivery of the site”.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	The areas of Country Park / Public Open Space and Green Linkages need to be removed from the map on page 65 of the draft Local Plan on the completion of the ‘studies and work’ called for in Paragraph 6.58. The ‘North East Thattham Proposal’ layers need to be removed from the Policies Map for the time being.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Thattham Town Council is the principal representative body of the community of Thattham, which is the location of the site allocated for development in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council provides local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the area. The Town Council would like to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as set out in the representation. The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than ‘minor modifications’. If, however, the Inspector is minded to consider recommending ‘main modifications’ to policy SP17, it would welcome the opportunity to provide its perspective on what modifications would be required.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The	Yes

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pask, Graham & Hilary
Consultee Full Name	Graham & Hilary Pask
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1132
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 21:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to make the following observations on the Reg19 consultation.</p> <p>I have represented Bucklebury on WBC since 1987 and broadly support the Local Plan, it is essential that we remain to comment specifically on SP17 and it's impact on all rural villages to the north of the proposed site especially Bucklebury.</p> <p>1. Traffic. When developments in North Thatcham took place in the 1990s there was a considerable increase in "rat" rural road network. Unless planned and managed carefully SP17 will add considerable volumes of such traffic, a lot of road improvements to the A4 but it is essential that there should be no direct access to Harts Hill Road which would impact on Bucklebury even more. There should be no carparks on Harts Hill Road as this is totally unnecessary!</p> <p>2. Bucklebury Common is common land open to all, we welcome careful visitors, but it is a fragile ecosystem careful not to be used for new development and should not be used as such. Access to the AONB must not be enhanced or directly encouraged. Any development should be contained on site.</p> <p>3. For many years we had a "strategic gap" between Thatcham and Upper Bucklebury, a policy that no longer exists. The "gap" identified in the Plan as suggested elsewhere between settlements.</p> <p>4. A proposal for development at Siege Cross was submitted in 2016 for around 850 houses just after the current Local Plan was adopted but a Planning Inspector was minded to approve the proposal. The Secretary of State refused the application on the basis that the number of houses to be built on a small part of SP17 but I firmly believe the "Colthrop" site should be reconsidered, to include a bridge over the railway line and canal/River.</p> <p>In any case since the proposed number of homes on SP17 has been reduced from 2,500 to 1,500 there should be a clearly defined proposed site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>I firmly believe the "Colthrop" site should be reconsidered, this would provide a much needed bridge over the railway line.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I would wish to be invited to the public enquiry to expand on the points I have raised and to answer any questions.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thorpe, Sharon
Consultee Full Name	sharon thorpe
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS959
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>As a resident, in the neighbouring Chapel Row village for 12 years, I am writing to lodge my strong objection to this development. This would have a significant and an irreversible negative impact on the existing communities, infrastructure and wildlife. The planned infrastructure to support such a large development is not sufficient, and will put pressure on the police, roads and transport services, not to mention the water and waste services. I don't believe there has been sufficient consideration warrant the approval of such a development and the plan does not address, to an acceptable level, the additional demands. Adding new schools does not address all the other infrastructure needs. I have not seen plans for a new train station nor how this additional load will be managed on an already high risk water and waste network. We have seen recent developments in Thatcham for doctor surgeries, with a move to transfer patients to the Chapel Row surgery making it impossible now. Building such a development of this size near an AONB and many other surrounding areas that are at risk of flooding will have a detrimental impact to the AONB and there is a flagrant disregard on conserving and enhancing the natural beauty of the area providing easy access to roads going through Chapel Row village. This road is not designed to take this level of pressure with no footpaths. Currently Chapel Row caters for cyclist and horse riders; a quiet and idyllic village that you are destroying. You might meet your goal of introducing houses to hit your target of 9,775 homes for 2037 but in doing so you will be out of control for years to come.</p> <p>In recent years local objections to developments in the area have evidently been ignored, such as building on the Thatcham too late to carry out more in-depth impact analysis and course correct, I implore you to do so.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Gerdes, Melanie</p>

Consultee Full Name	Melanie Gerdes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS819
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 23:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes
* No

Please give reasons for your answer

I write with regard to the Local Plan Review, in particular the proposal to build 1500-2500 houses on land in NE Thatcham Bucklebury, I am horrified and strongly object on the basis that the development would have an overwhelmingly negative impact on the residents and wildlife of the area and that many components of the plan are unsound. I note that my previous Consultation Statement document of December 2022 and would ask that the comments below are taken into account.

Objection 1 – Environment

I note that in its responses to objections regarding the impact on the environment, the council frequently states that the development would be within an AONB. However a development of such a scale on the proposed site would have a devastating impact on the Bucklebury Plateau Biodiversity Opportunity Area and the surrounding ancient heaths, woodlands and Common. The area is home to a number of **legally protected species** which would surely mean that any action causing a detrimental impact cannot understand how such a huge development would be anything other than large-scale, wilful, illegal damage to the past alluded to mitigation measures but this is unsubstantiated 'greenwashing'. There is no way of mitigating damage.

As part of this proposed 'mitigation', WBC has previously alluded to the creation of two 'country parks' which have morphed into 'community parks'. Such parks would need to be properly planned, funded and managed in order to attempt to significantly improve existing levels - which would seem to be an impossible task. The absence of any detail is indicative of a total lack of understanding of the local environment. (One is left to speculate that perhaps such parks may just be areas of tarmac, with perhaps a few trees and swings?) No man-made park could in any way 'compensate' for the loss of habitat for local species – there is no compensation they go any way at all to replacing an area which is enjoyed by local people and contributes considerably to their well-being. I include myself in this. I have walked the area with my children and dogs for the past <redacted> years and have always found it a place of relaxation, a place to remember that I am part of nature, not disconnected from it. (Those in favour of this proposal will find it nothing less than devastating that this area might be destroyed – seemingly because some people want to make the cost to the natural world.

WBC has stated in the LPR that a Sustainability Charter must be produced, outlining how policy requirements will be met, including biodiversity net gains and an overall positive impact on environmental sustainability. The supporting documents which have not been made publicly available for the consultation. I would like to know if they exist and if so, why they have not been made available.

The LPR also states that it intends SP17 to drive more people (presumably including the 4000+ residents of the development) to work in the area again shows a staggering lack of understanding on the part of WBC. The management vision for Bucklebury Common adds additional pressure on ecosystems which need to be restored, nurtured and protected.

A great deal of money seems to have been spent by WBC preparing housing plans and attempting to justify such a development without any evidence of a serious effort to understand the consequences for the local environment.

Objection 2 – Transport

The significant increase in cars on roads in the area which the development would cause is extremely worrying. WBC states that traffic from the development would link to Floral Way and the A4 but I understand that the Phase 2 Transport Assessment shows an exit at the north of the site onto Harts Hill, together with a car park - the purpose of which is unclear. Traffic from this area would travel through Ash and through the village towards Chapel Row, significantly increasing the number of cars in the village. This would change the character of the village but would also make Harts Hill (which is already a tricky road to navigate due to the number of narrow lanes, especially for those on foot or bike. The Sustainability Appraisal/SEA which accompanies the Local Plan Consultation and the Sustainability Objectives, of which No.4 is 'To promote and maximise opportunities for all forms of safe and sustainable transport'. Modelling data for this junction, how can WBC have concluded as it has that the LPC will have a positive impact on road traffic? Travel time will be critical to the design of the site' but where is its supporting evidence for this? Similarly WBC has assessed a 'Positive Impact' on 'opportunities for walking, cycling and the use of public transport' but again no evidence has been provided. Common sense would suggest the contrary.

Moreover, the lack of a detailed plan for the provision of education and the siting of new schools makes it impossible to plan for the future in the area – see below.

Objection 3 – Education

WBC has an obligation to provide education for children in the county but there is no clearly defined plan in the LPR. For SP17 states that 'the site will provide Early Years provision' and gives no detail at all. For primary education provision of £12million be contributed by the developers but the number of schools and Form Entry requirements are unspecified. (Clearly such provision needs to be in place before houses are built) and no sites are specified. Furthermore as the data used for this is from 2011, how does WBC know that this provision will be enough? Surely WBC has an obligation to use current data produced over a decade ago? The NE Thatcham Development Plan even states that 'this study has not engaged in a detailed prediction and modelling exercise to determine future primary and early years educational demand across the town, and the long-term capacities of existing schools'. Why not?

The LPR is similarly incomplete with regards to secondary provision in Thatcham and the surrounding area. It proposes £15million towards the provision of secondary education but again no locations and nor timescales are specified. And

that secondary schools with less than a 6 Form Entry are untenable and the data used is out of date, how does WBC would be viable or that the proposed level of funding would be sufficient?

It is my belief that the LPR is scant and unsound in respect of educational provision within Thatcham and the surround

Objection 4 – Recreational Facilities / Sports Fields

The LPR mentions the provision of sports fields but no sites or funding appears to have been allocated for these. Su ground and the only flat area of the site is adjacent to the A4 and would be liable to high levels of traffic fumes.

It should also be noted that the only leisure facility currently available to the public in Thatcham is at Kennet School a both the school and the public.

Objection 5 – Healthcare

I note that SP17 proposes a primary healthcare centre which it suggests would be offered to a suitable public health centres are commissioned by the NHS, even where there is need, and information in the public domain shows that t in other areas than there are in West Berkshire. It would seem therefore that there is no likelihood whatsoever of a n built. Nor would it make any sense for an existing local practice to set up a branch on the proposed site because of t the impracticalities of working across two sites. All three existing practices which cover the site are already overstret each GP looks after just under 2000 patients and this workload has been further impacted by the recent closures of a n

Similarly dental practices in the area are already stretched with many residents travelling outside of the area for eith

There is no evidence in the plan that WBC has communicated with healthcare agencies or providers nor has it produ for the North-East Thatcham development. I am extremely concerned about the potential for a severe lack of healthc new residents of the area should the development go ahead, which would without doubt put lives at risk. I find WBC's u attitude towards this aspect of the plan particularly shocking and deeply worrying.

Objection 6 – Updated Planning Guidance

On 6th December the Secretary of State for Levelling Up, Housing and Communities released a statement detailing longer be mandatory but serve as a starting point and that the Planning Inspectorate should no longer overrule local making should itself reflect local concerns and constraints.

Several Local Authorities have subsequently paused their planning and I do not understand why WBC has not taken the NPPF which runs until 2nd March this year not only states that the housing requirement figure will now be advisory I **area must be considered in any assessment**. The development area proposed by SP17 is rural and loved as such development on it – particularly of the extraordinary size proposed – would forever change this.

In conclusion

-
I understand that there is a great need for more affordable housing, especially for young people and young families. F for a case study in how not to plan a housing development, this could be it. It seems to be a ill-conceived, lazy and g target which is no longer even valid, by dumping a huge number of houses on the edge of an existing town without g sustainable infrastructure so people can live well there with minimum impact on the local environment or planet. I thi frankly I think WBC should be embarrassed to have produced it.

On a personal level I'm dismayed and horrified by the potential loss of countryside which is dear to myself and my fa fauna in the area, the potential for multiple forms of pollution (air, light, soil etc) and flooding, and by the prospect of so close to our family home.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1648
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>“(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible person shall prepare, and submit to the competent authority, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.</p> <p>The SA/SEA Environmental Report describes how only a single alternative was considered in the Interim SA/SEA for Regulation 19 Consultation, two alternatives are considered, for 1,500 homes and 2,500 homes. No explanation is given as to why alternatives with fewer than 1,500 homes were not considered.</p> <p>One ‘reasonable alternative’ that should have been considered is to divide the required number of homes between two sites. The SA/SEA states that “A large strategic site can deliver a number of positive benefits”. This is undoubtedly true, but it is not true, as evidenced by the analysis in Section 2 - Soundness below:</p> <ul style="list-style-type: none"> • The NE Thatcham site would have two primary schools, so two smaller sites could have one school each. • The provision of a GP surgery is not related to the number of houses; it would be provided by the proposal for 2,500 houses. • The site is stated to have “local centres providing local retail facilities and small-scale employment for communities”. If these centres, then they could be distributed between several smaller sites. • A site of either 1,500 or 2,500 homes is not sufficient by itself to support the provision of secondary education.

	<p>The SA/SEA for Policy SP13 states:</p> <p>“Due to the proposed strategic allocation in Thatcham, it is not considered appropriate to allocate any further sites in Thatcham as all suitable sites have been assessed.”</p> <p>The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policies SP1 and SP13 are therefore not considered appropriate as they have not considered all of the ‘reasonable alternatives’ to a single development of 1,500 homes.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of the NPPF.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	A review of Table 30 should be part of a wider review of the Sustainability Appraisal / Strategic Environmental Assessment for North East Thatcham.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of the site in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the site is not considered suitable for development as it is not in the draft Local Plan.

	<p>promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as o</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1690
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>The viability of the proposed GP surgery should have been considered as part of the Sustainability Appraisal for Pol Healthcare is identified in the Sustainability Appraisal as a 'Key sustainability issue' under the social category. The si clearly not an adequate assessment, and appears to have been written without any consideration of the specific pro</p> <p>"The policy is likely to have a positive impact on accessibility community services and facilities, including education pr other services/facilities".</p> <p>The Sustainability Appraisal is clearly not legally compliant, because it does not appraise for Policy SP17 what has b sustainability.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Thattham Town Council questions whether the '450 sq. metres GP Surgery' proposed for North East Thattham in P is viable, given the increasing range of NHS healthcare services being provided through primary care.</p> <p>We are concerned that the Duty to Cooperate Statement makes no mention of any discussions between West Berkshire, Oxfordshire and Berkshire West Integrated Care Board, or its predecessor the West Berkshire Clinical Commissioning Group, that it will be offered to it.</p> <p>We understand that that a facility of this nature requires the preparation of a Health Impact Assessment (HIA) in accordance with guidance from Public Health England. While this assessment may not be a requirement at this stage, it would be prudent for West Berkshire to commission such an assessment before specifying the size of a surgery in the draft Local Plan. If it transpires that 450 sq.metres is not viable, that it will be built but never adopted by a GP practice, or that a developer will decline to build the larger facility that is proposed, then the Council will consider the implications for the Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Section 33A of the Planning and Compulsory Purchase Act 2004 states:</p> <p>Duty to co-operate in relation to planning of sustainable development</p> <p>(1) Each person who is—</p> <p>(a) a local planning authority,</p> <p>(c) a body, or other person, that is prescribed or of a prescribed description,</p> <p>must co-operate with every other person who is within paragraph (a), (b) or (c) or subsection (9) in maximising the extent to which the activities within subsection (3) are undertaken.</p> <p>(2) In particular, the duty imposed on a person by subsection (1) requires the person—</p> <p>(a) to engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken,</p> <p>(b) to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).</p> <p>Paragraph 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 states:</p> <p>Duty to co-operate</p> <p>1 (1) The bodies prescribed for the purposes of section 33A(1)(c) of the Act are —</p> <p>(g) each Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by section 25 of the National Health Service Act 2006. Primary Care Trusts were replaced in 2013 by Clinical Commissioning Groups, and these were replaced on 1st July 2013 by the Oxfordshire, Buckinghamshire and Berkshire West Integrated Care Board. In this case, the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board.</p>

	<p>Paragraphs 4.30 and 4.32 of the 'West of Berkshire Area Statement of Common Ground for Local Plan-Making (August 2022)' identify primary health care as falling within the Duty to Cooperate.</p> <p>Paragraphs 5.31 to 5.34 of the Duty to Cooperate Statement address Health. However, they only discuss health and general terms, in relation to draft Local Plan policy DM3.</p> <p>There is no mention in the Duty to Cooperate Statement of primary healthcare. In particular, there is no mention of cooperation with the Oxfordshire and Berkshire West Integrated Care Board in relation to the proposal for a 450 sq. metres GP Surgery at Thatcham.</p> <p>The Council has therefore failed to comply with its legal duty to cooperate with the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board, or its predecessor the West Berkshire Clinical Commissioning Group.</p> <p>This proposed surgery is not mentioned in the Infrastructure Delivery Plan (January 2023).</p>
4. Proposed Changes	<p>The draft Local Plan cannot be adopted until West Berkshire Council has received confirmation from the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board that the proposed GP Surgery meets its requirements.</p> <p>If the Local Plan is submitted for examination before that has happened, it would need to be rejected through non-compliance with the requirements of the Local Plan.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thatcham Town Council is the principal representative body of the community in the area. The location of the Strategic Site Allocation is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the requirements for development promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the examination of the draft Local Plan for Thatcham, and particularly on the substantial deficit of infrastructure in the local area. The Town Council is happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to the Strategic Site Allocations are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related policies, it would welcome the opportunity to provide its perspective on what is required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	North East Thatcham Partnership (Represented by Lichfields)
Consultee Full Name	North East Thatcham Partnership
Consultee Organisation	North East Thatcham Partnership
Agent Full Name	Pippa Nisbet
Agent Organisation	Lichfields
Comment ID	PS1493
Chapter / Policy / Appendix Number	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:47:00
Attached Files	PS1493 Lichfields (NET Partnership) SP17 Map.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	It is understood the Council has followed the Duty to Cooperate under Section 33A of the Planning and Compulsory Plan Review (LPR) is being produced through close partnership working with West Berkshire Council's neighbouring cross-boundary planning issues are being taken into account and a Duty to Cooperate Statement accompanies the Draft a Sustainability Appraisal and a range of background evidence has informed the LPR.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Our representations are prepared in relation to the strategic promotion of land known as North East Thatcham ("NET" which comprises A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land who are jointly promoted by its landowners. The Partnership has signed a collaboration agreement to ensure that the site at NET comes forward for piecemeal development. The agreement should give the Council confidence that a comprehensive approach will be taken and the Partnership remains fully committed to progressing a planning application as soon as the site's allocation within the Local Plan is

We consider that the overarching approach of the Local Plan in selecting Thatcham for large-scale housing growth to be focused on the NET via Policy SP17, is sound. However, there are some individual elements of the policy that have not been made sound and meets the tests of the NPPF.

The key policy considered in this representation is Policy SP17 (North East Thatcham Strategic Site Allocation) and Policy SP18 (Housing Type and Mix) allocated for residential and mixed-use development in Newbury and Thatcham) and SP18 (Housing Type and Mix) allocated for the NET strategic site.

We support Policy SP17's proposal to include the land at NET as a significant future allocation to deliver a residential development.

Policy SP17 has been informed by a comprehensive Local Plan process and the evidential foundations exist to support the policy. The policy is modified in ways that we explain later in these representations

The Scale of Development at NET

It is helpful to set out the evolution of the NET allocations in the emerging Local Plan to explain the basis for the specific allocations and why the plan is sound.

In February to March 2018, West Berks Council began the process of bringing forward its Local Plan and consulted on the Draft Local Plan Report and assembling the evidence base to explore and then establish the basis for bringing forward the site at NET. A Reg 18 consultation took place to explore the broad issues around scale of growth, settlement hierarchies and effects of growth.

Paragraph 11 a) of the NPPF is at the heart of plan-making, encouraging a presumption in favour of sustainable development. It states that "development should promote a sustainable pattern of development that seeks to: *meet the development needs of their area; align with the natural environment; mitigate climate change and adapt to its effects.*" (Lichfields emphasis).

In this context, the evidence which underpins Policy SP17 has sought to achieve a sustainable pattern of development that meets the development needs of the area and ensuring that future growth is aligned with infrastructure provision to enable that growth and the wider infrastructure improvements needed.

Part of the Local Plan evidence base included a study by David Lock Associates (DLA) – the Thatcham Strategic Growth Study. This study is in three parts – the past, present and future.

The broad thrust and approach of the TSGS work and its conclusions identified that Thatcham has a series of infrastructure needs. It concluded that only growth of a strategic scale could support the service provision and regeneration that Thatcham needed. This demonstrated the suitability and deliverability of the NET site as a driver for the regeneration of Thatcham.

The TSGS sets out that NET has the potential to accommodate up to 2,500 new homes, 40% of these being affordable. It also sets out how the site's development could include provision for:

- a new strategic country park for the whole town, linking Thatcham to the plateau and AONB
- Approximately 50% of the site given over to green open space of different types
- Surface water management approaches that could deliver net gain for the town
- Biodiversity net gain through habitat restoration and linkages
- Two new primary schools (1x 3FE, 1x 2FE) with flexibility on locations and provision
- An 8FE secondary school serving all of Thatcham
- Dedicated sports fields and dual-use sporting facilities shared with the secondary school
- Local centres providing local retail, facilities and small-scale employment space
- New local facilities and an extension of area for Colthrop Industrial Estate
- Active travel improvements on routes between the site, town centre and railway station
- Potential for community spaces at key locations adjacent to the country park; and
- Public transport and active travel provision

The TSGS "Concept Plan" for the site (pages 60-65 within part 3, the Future document) provided an illustration for how the site could be developed at that scale, whilst identifying a need for flexibilities and more technical work to inform a more precise plan (e.g. pupil requirements / school provision; specific flood attenuation design; impact of views on the skyline etc).

The HELAA was first published in February 2020 and has subsequently been updated in December 2020 and January 2021. It was considered as four different parcels (THA6, THA8, THA10 and THA20). Following the forming of the Partnership and agreement, these parcels were amalgamated to form one strategic site submission known as "THA20." As part of the process, the parcels were appraised in the Thatcham area but were eventually concluded as unsuitable. It was considered that due to the strategic scale of development required a site to be the best site to deliver this, no further allocations in Thatcham should take place within the Local Plan period. The HELAA comprises agricultural fields at present, the majority of land within the district is agricultural (Grades 2 and 3) and the paragraph 3.30 that "no sites have been considered unsuitable because they contain the best and most versatile agricultural land in the volume of agricultural land across the district, for delivery of strategic level

development, it will be inevitable that some agricultural land must be released.

The Site Selection Background Paper pulls together the key conclusions arising from the local plan evidence base and be brought forward as allocations. Based on the TSGS and HELAA, the Paper importantly states that NET is suitable *with infrastructure*." This assumes development up to 2,500 dwellings in line with the studies to date. It concludes that could support the service provision and regeneration that Thatcham requires." (Lichfields emphasis)

The emerging draft LPR (published December 2020 under Regulation 18) put forward Policy SP17 (North East Thatcham). Policy SP17 stated that *"the site as allocated on the map is allocated as a residential-led development comprising a part of this, development of the site will be expected to deliver:*

- At least 40% affordable housing
- A housing mix which complies with the housing mix contained in Table 4 of policy SP18 Housing type and mix
- At least 3% of dwellings to be delivered via serviced custom/ self-build plots
- On-site renewable energy to assist in the delivery of a carbon neutral development
- 2 new primary schools (1 x 3FE, 1 x 2FE) and the sports infrastructure requirements of those schools
- A new secondary school (8FE) and the sports infrastructure requirements of that school
- Surface water management approaches that could deliver net gain for Thatcham town
- Biodiversity net gain through habitat restoration and linkages
- A network of green infrastructure which will include a new strategic country park linking Thatcham to the plateau
- Local centres providing retail facilities and small-scale employment space
- Active travel improvements on routes between the site, town centre and railways station
- Appropriate vehicular accesses and a through route
- Sustainable transport through routes

Representations were made on behalf of the Partnership (December 2020-Feb 2021) which endorsed the Council's approach of a strategic scale, noting that the development will help regenerate Thatcham and contribute towards meeting its infrastructure needs. The Partnership's representations included an overview of the work undertaken by technical advisors and the underlying evidence.

The West Berkshire Interim Sustainability Appraisal Report (Dec 2020) identified that the Council's spatial strategy (continued approach to focusing development in settlements in line with a District-wide settlement hierarchy. Thatcham urban area, is noted as a sustainable location for development and it highlights that a new urban extension allocated for development and will provide a new residential neighbourhood with supporting facilities and green infrastructure. This will enable long term planning for Thatcham.

It anticipates delivery of at least 1,250 dwellings within the plan period and notes that there are a number of significant benefits that developing the site would have, including maximising the provision of: affordable housing; custom and self-build plots; and public open space, new community infrastructure; including primary and secondary schools; and improvements to transport to improve opportunities for sustainable travel.

The SA/ SEA Environmental Report (November 2022), Appendix 4 assesses two development quantum of allocations of 2,500 homes and 1,500 homes. In the case of the *"up to 2,500 home"* allocation there are shown to be more positives than negatives. This is mainly in respect of two issues – housing and infrastructure; 2,500 homes will enable a significantly higher provision of facilities to meet needs, in a sustainable location meaning fewer additional sites will be required across the district in due course to meet need than for 1,500 homes. 2,500 homes would allow for infrastructure necessary to support the development of the site to be provided within the site. The new homes will be located. It would also support regeneration and improvement of other community facilities within Thatcham. In the 1,500 home allocation, the site would only allow for some of the infrastructure necessary to support the development of the site to be provided and it is stated it may be unable to support some of the larger community infrastructure projects required to allow for growth (e.g. education facilities).

In summarising the effects, it concludes that the allocation of *"up to 2,500 homes"* will have a positive effect on all elements of the development provides for community infrastructure to be delivered on site, resulting in a significantly positive impact. The *"1,500 home"* allocation would simply have a neutral impact on all elements of sustainability and the development would require a wider range of facilities to support Thatcham.

Following Reg 18, there was a slight delay to the Local Plan as a result of further work by the Council responding to representations. In parallel, the Partnership has been working to undertake its own masterplanning and feasibility work taking into account access design, topographical survey, tree survey and landscape constraints. The emerging conclusions of this work indicate an estimated yield of around 2,275 dwellings, with a theoretical maximum of 2,670 alongside proposals for two primary schools and a secondary school alongside the site.

Separately, two parties - Croudace Homes and Colthrop Village Consortium - have joined together to suggest an 'Alternative' strategy claimed it could deliver Thatcham's housing needs for the Local Plan period on two smaller sites (totalling 1,100 dwellings) and reduce the impact of new development on Thatcham residents. The Council's position however remains the same as the background evidence. This position is that growth of a strategic scale needs to occur in Thatcham and the focus

be on one strategic site. The site assessed as being most suitable to deliver this is North East Thatcham. Other alternative sites in Thatcham have been discounted – through the evidence, including the HELAA - for a number of reasons such as flood risk. These were also able to deliver the scale of growth that Thatcham needs.

Towards the end of 2022, the Council appears to have revisited its approach to the scale of the NET site. The change in the policy in the Regulation 19 Submission West Berks Local Plan Review (WBLPR) allocating the site to “approximately 1,500 homes” is not supported by the Council’s evidence to date does not support the reduced number; indeed, the evidence shows that significantly more homes can be supported on the site. As mentioned, the SA/SEA shows this higher quantum to generate more positive outcomes but the November 2022 SA/SEA Environmental Report states that up to 2,500 homes is no longer to be taken forward as the “potential impact to local community is considered high and on the site is considered to be more acceptable.”

Precisely how many homes would come forward on the site will need to be established through further detailed technical work. This will be based on a range of factors including a masterplanning exercise and a Landscape and Visual Impact Assessment. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and open space. The Council’s evidence base and the Partnership’s work to date indicates that up to 2,500 homes could be delivered at NET, yet the ability to do so would now be limited by the current wording of the SP17 policy, contrary to its evidence base.

The Indicative Site Plan, which accompanies Policy SP17 appears to assume that no development should occur above the 110m contour line. It is speculated that views may be more open (guided by previous work set out within the TSGS). Importantly, the TSGS used “should form a ‘soft constraint’ to development, with local conditions considered.” The Partnership has commissioned a study to carry out an analysis to consider at what heights development could be introduced on the site in a way that would be acceptable in terms of and visual impact. This work shows that development on the higher ground (e.g. above the 110m contour line) is possible, whilst the introduction of green space in other areas will ensure that almost exactly half of the site can be left as landscape. It is considered that it would be premature to establish limits to the scale of homes or spatial extent of development before the technical work is prepared.

The Indicative Site Plan should be limited to a red line site plan that clearly shows the extent of the wider allocation boundary. This is unevidenced and unjustified, and which pre-empt further masterplanning and technical work that can provide all the evidence that the potential of the site is achieved, whilst ensuring LVIA and other relevant matters are properly protected. It is important that Policy SP17 therefore retains a degree of flexibility to meet the tests of soundness, making provision for up to 2,500 homes to be delivered subject to further detailed evidence (e.g.

Masterplanning, LVIA and viability work) in the future, and for it to support the appropriate scale of growth which Thatcham needs.

Our objections to the policy therefore focus on the reference to “approximately 1,500 homes” not being sound. We do not have a specific aspect of the policy is:

1) Not positively prepared: The West Berkshire Strategic Vision 2050 (produced by the Council in response to the Interim Strategic Planning Review) provides the basis for looking at growth over the long term. It shows that any expansion of Thatcham – within and beyond the current boundaries – should be directed to the north of the town. It is therefore not appropriate to limit the scale of growth at NET to an arbitrary figure. The site has a realistic prospect of accommodating more than this. Meeting OAN for the plan period is a minimum requirement. If the Council has opportunities to do more than this, they should be actively taken.

2) Justified by evidence: as explained above, the evidence base relied on by the Council for NET finds that the site could support up to 2,500 homes and there is no evidence supporting imposing a lower cap on the quantum of development; indeed, the evidence shows that up to 2,500 homes on the site - shows the higher quantum of development to generate more positive outcomes.

3) Not effective: a larger scale of development on the site can support more infrastructure and the Council’s evidence base shows that the capacity of the site at 1,500 is aligned to the level of infrastructure.

4) Not consistent with national policy: Among the aspects of concern, we would flag four references:

1 NPPF para 124 states that “*Planning policies and decisions should support development that makes efficient use of land, taking account of a range of factors. None of these have been identified with evidence by the Council in justifying limiting the capacity of the site to 1,500 when previous work has indicated a capacity of up to 2,500. Policy SP17 requires in any event to establish a capacity of 1,500 based on a masterplan and LVIA work. Further, it is clearly relevant to para 124, that the density for the site should be supported by improvement of infrastructure and services and in this regard, it is clearly relevant to the provision of social and community facilities such as educational facilities such as a secondary school. The IDP notes the benefits of secondary school provision and that the capacity of the site at NET should be set through the masterplan under Policy SP17 that in due course takes education provision into account; the evidence does not currently support the idea of limiting the capacity of the site to 1,500.*”

1 Paragraph 16 of the NPPF states that, “*Plans should: d) contain policies that are clearly written and unambiguous so that the planning maker should react to development proposals.*” It is inconsistent for Policy SP17 to limit the capacity of the site to 1,500 when the evidence suggests the site could potentially accommodate more and when the policy itself says that the capacity should be determined with reference to further technical work that has not yet been completed. If that further work shows that the site could accommodate more than 1,500 homes (perhaps closer to the number estimated in the Council’s own evidence base)

- 1 Paragraph 22 of the NPPF (July 2021) states, “Where larger scale developments such as new settlements or villages and towns form part of the strategy for the area, policies should be set within a vision that looks further into account the likely timescale for delivery.” The findings of the 2050 Vision work – prepared by the Council in re – demonstrate that there are limited long term options available to West Berkshire for growth of Thatcham. It would be to set a density for the whole site that is artificially and unjustifiably low and would prevent it from fulfilling a role. There is evidence to show that approximately 1,500 sets the threshold for an acceptable scale of development. Of note, the Paper (Jan 2023) projects a trajectory of 150 dwellings/ annum from 2029-2039 for NET.
- 1 Paragraph 73 of the Framework refers to the opportunity for large scale developments and the requirement – in NET for these forms of development – to ensure their size and location will support a sustainable community with employment opportunities within the development itself. This points to the need – through the evidence – to set the proposed scale of housing capacity within the site, which the Council has not done. By contrast, a policy that would (as proposed in the Reg 18 Plan) would have done so via the existing evidence base, notably the TSGS).

Taken together, the solution to the problems identified is to change the wording of the policy so that rather than referring to it instead refers to “a minimum of 1,500 homes”. A consequential change would also be required to Policy SP13 which refers to homes at NET”.

Housing Mix

The approach of Policy SP17 to housing mix also requires adjustment to be sound because it provides no flexibility to be provided on NET from that identified in Table 3 of Policy SP18.

We support the approach of Policy SP18 (Housing Type and Mix) itself, which refers to Table 3 in setting the SHMA’s to be applied to planning applications on different housing sites. Of note, point b. allows for schemes to have some flexibility prescribed strategic level mix in Table 3. Point b. states that in determining any variation from the mix, the Council will “mix for the site’s size and location”.

However, Policy SP17 – which cross refers to the mix in Table 3 of SP18 - does not provide the equivalent flexibility to be afforded to NET within Policy SP17 in order to secure its future delivery and be consistent with Policy SP18. Whilst the level mix is in line with the NPPF and may be appropriate for the District and as a starting point for setting a mix in individual phases, it would be the ability to set an appropriate NET specific mix to respond to wider considerations such as market need and viability as well as site planning and design within individual phases. As it stands, this part of the policy as drafted would not be effective or consistent with national policy.

In simple terms, in order to be sound, the flexibility afforded to any site in the District by SP18 should similarly apply to NET.

We have suggested amended wording below to Policy SP17

The scale of Community Uses on the site

Whilst the overall approach to provision of community facilities is supported, it is premature to specify the quantum of facilities as the capacity of the site being determined through the masterplanning and LVIA exercise specified in the Policy. For example, if the LVIA shows that the site capacity is increased from the 1,500 homes identified as a minimum (to reflect the efficient use of land), this might change the quantum of retail facilities, or number of schools, or community indoor facilities. This is not justified with reference to the evidence base for the NET allocation, and in any event given the scale of residential development (and thus the need of the population for the scale of these facilities) is not yet fixed.

The policy is therefore not justified, effective or consistent with national policy.

We have suggested changes to the policy accordingly, referring to the facilities being what is necessary to meet the needs of the community.

The new community park and the AONB

We support the concept of a new community park, but we are concerned at the reference in the policy to it “linking Thatcham Downs AONB”. This is because the boundary of the AONB and the NET allocation are not contiguous, so it is not clear how it can be delivered within the site allocation. This aspect of the policy would thus not be directly achievable; nor therefore – if one accepts a direct link is not possible – would the policy expectation meet the NPPF (para 16) requirement “in terms of how a decision maker would react to development proposals” that did not provide that direct connection. This requirement should be removed, so the requirement is limited to provision of a community park. The objective of ensuring the connection to the AONB from Thatcham is in any event secured by the second bullet point listed under the policies ‘Green Infrastructure’ “Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes”.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
* Yes

Yes

* No	
Please give reasons for your answer	A Duty to Cooperate Statement (January 2023) has been prepared to support the proposed submission (Regulation 19 of the LPR the council has identified that it has engaged with a wide range of duty to co-operate partners. The council has considered relevant strategic matters which they need to address in their plans. They have undertaken and maintained effective and constructive strategic policy-making authorities and relevant bodies. In particular, joint working has helped to determine where additional development and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
4. Proposed Changes	<p>We suggest the following changes (in bold text) to Policy SP17 are required to make the Local Plan sound. This is in section 2 above.</p> <p>Policy SP17</p> <p>North East Thatcham Strategic Site Allocation</p> <p>Land as shown on the Policies Map is allocated for a sustainable low carbon, urban extension comprising of distinct landscape and connected and contributing to Thatcham, and woven through with natural habitats and links. The site will be developed as a whole to achieve a comprehensive development. The provision of all infrastructure, services, open space and facilities what is necessary to meet the needs of the development, timely and co-ordinated. The Thatcham Strategic Growth Study provides guiding principles and proposals will therefore demonstrate that these guiding principles have been positively met.</p> <p>Homes</p> <p>The site is to be allocated for approximately 1,500 dwellings which will be completed within the period of the plan and a minimum of 1,500 dwellings up to 2,500 dwellings. These dwellings will comprise of a housing mix which complies with the requirements contained in Table 3 of Policy SP18. In addition at least:</p> <ul style="list-style-type: none"> • 40% of dwellings will be affordable housing; • and 3% of dwellings will be delivered via serviced custom/self-build plots. <p>Community</p> <p>The site will provide:</p> <ul style="list-style-type: none"> • Local centres to meet the needs of the development, providing local retail facilities and small-scale employment (including and F2 and Sui Generis); • 450-sqm GP Surgery to meet the needs of the development and to be offered to the Buckinghamshire, Oxfordshire and Berkshire Integrated Care Board or other such appropriate body; • Early years provision; • A 2.5 FE Primary school provision on site and sports infrastructure requirements of the school to meet the needs of the development and land is to be provided and build costs to be met by the applicant; • Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation will be undertaken at the applicant's expense and prepared in collaboration with the Council and local stakeholders; • A 1,200-sqm community indoor facility to be used for sport and community uses with a variety of room sizes (including meet the identified need of the development); • Outdoor formal and informal sports pitches and areas to meet the identified need of the development; • Open space to meet the needs of the development in accordance with Policy DM401; <p>Green Infrastructure</p> <p>The site will provide a comprehensive green infrastructure network which will take advantage of the landscape features of the site. This network will comprise:</p> <ul style="list-style-type: none"> • A new community park linking Thatcham to the North Wessex Downs AONB; • Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes; • A comprehensive network of other accessible routes and connections within the development which provide walking and cycling routes; • Existing and new Public Rights of Way; and • Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain. <p>Transport</p> <p>Measures will be included to improve accessibility by, and encourage use of, non-motorised transport modes. A Transport Strategy will be prepared on how this will be achieved, including:</p> <ul style="list-style-type: none"> • Active travel improvements on routes between the site, Thatcham town centre and the railway station; • A vehicular through route; • Sustainable transport through routes; • Mitigation of the development's impacts on the highways network with improvements to existing junctions where necessary and new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority.

- How adverse impacts on air quality will be minimised.

Sustainability

Development of the site will be supported by a Sustainability Charter which will establish how policy requirements will be supported by:

An Energy Strategy which sets out measures to achieve a model low carbon development (following the energy hierarchy SP5 and DM4, including:

- net zero carbon (regulated and unregulated energy) emissions for dwellings;
- BREEAM 'excellent' non residential buildings;
- on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and
- carbon off-setting

An Integrated Water Supply and Drainage Strategy which will set out:

- measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water treatment;
- surface water management approaches that could deliver net gain for Thatcham town, including use of on-site water storage (SuDS).

An Ecology Strategy which will set out:

- a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and creation;
 - how priority habitats and ecological features will be protected and enhanced;
 - the creation of new ecological features; and
 - a site-wide management plan.
- A Green Infrastructure Strategy which will show how a network of multifunctional green infrastructure will be delivered including:
 - A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced, including bridleway links and safe crossing points.
 - A Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs to mitigate the impact on biodiversity.
 - A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for LVIA Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2021) of the site.
 - A Mineral Resource Assessment (MRA).
 - A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how their settings has been considered.
 - A Construction and Operations Management Plan (COMP) shall accompany any planning application on the site to protect the oil pipeline from operational works, including the provision of an appropriate buffer.

Above – Plan to be amended to show site boundary only [See attachment 'PS1493 – Lichfields (NET Partnership)]

Supporting Text

6.52 Thatcham has experienced rapid population growth during the post-war period, expanding more than 5 times since 1950, accompanied by infrastructure growth in transport, and a considerable expansion in the built-up area to match the population growth. Over the decades, the provision of social infrastructure has not kept pace with housing growth.

6.53 The vision for Thatcham contained in the Core Strategy DPD (2012) was that Thatcham town centre would be a vibrant town to fulfil its role within the District's Hierarchy of Centres by improving the retail offer and enhancing the street scene and community facilities for all ages would be improved and encouraged within the town centre. The town would become a range of job opportunities and encouraging residents to shop and socialise locally. Additionally, the Core Strategy DPD encouraged housing expansion in Newbury.

6.54 In reviewing the vision for Thatcham as part of the LPR, and to best understand how to plan for growth in Thatcham, the Council commissioned masterplanning work (Thatcham Strategic Growth Study (TSGS) 2020).

6.55 This evidence draws on other recent evidence produced to support the LPR such as the Landscape Character Assessment, Housing and Employment Land Availability Assessment (HELAA) (2020). The TSGS shows that Thatcham compares well in terms of overall service provision, including public services and commercial services. The town's self-image is of a vibrant, thriving market town.

6.56 In addition, it demonstrates that recent planning decisions support the approach that only growth of a strategic nature and provision and regeneration that Thatcham requires.

6.57 The TSGS considers the sites promoted to the Council as part of the LPR and recommends that if strategic development is the most appropriate location to examine in more detail is the site promoted at North East Thatcham.

6.58 The western edge of the site is adjacent to the existing Thatcham settlement boundary along Floral Way and Basingstoke Road. The site is adjacent to Colthrop Industrial Estate, which is contiguous with Thatcham. The new revised settlement boundary is the studies and work identified in the policy at the application stage.

	<p>6.59 Stage 3 of the TSGS examines the North East Thatcham site in detail and, using community objectives which were discussed at the stakeholder workshop, provides context for how development could come forward at the site.</p> <p>6.60 The Council's spatial strategy is outlined in Policy SP1 and affirms a continued approach to focusing development on the District-wide settlement hierarchy (contained in Policy SP3). Thatcham, as part of the Newbury and Thatcham urban area, is allocated for development. The TSGS shows the most sustainable way for development to come forward in the town and this policy is intended to support this development.</p> <p>6.61 Hence, Thatcham is now a focus for regeneration, for new housing and for improved provision of services and facilities. The area to the north east of the town is allocated for development and will provide a new residential neighbourhood with supporting infrastructure and enable long-term planning for Thatcham's future. Delivery of approximately 1,500 dwellings is anticipated.</p> <p>6.62 British Geological Survey data identifies that the site is underlain in part by construction aggregate mineral deposits. A Mineral Resource Assessment will be carried out to determine the possibility of prior extraction of the mineral in accordance with the West Berkshire Local Plan 2020-2037.</p> <p>6.63 Further detailed work will be required to develop a coherent masterplan or development framework to take the site forward. This will be produced in collaboration with the community and other stakeholders.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	Participation is essential to enable further clarification and justification of the points made above. The reps made comments and further evidence will be required to be presented to fully make our case at EIP.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dunks, Alison
Consultee Full Name	Alison Dunks
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1019
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 12:08:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to these plans as I find them unsound.</p> <p>The plans as they stand will have a significant impact on my personal well-being.</p> <p>The road noise on Broad Lane is already significant and prevents us from having our bedroom windows open overnight. This will only get worse with the expected increase in traffic.</p> <p>My husband and I currently enjoy the AONB. Under the proposed plans there is insufficient planned recreational space and the risk of over-spill into the AONB for those seeking green space.</p> <p>As a healthcare professional I also think that the plans fail to consider the current scarcity of healthcare resources. This is a concern for the current population without the additional burden of people from the proposed development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gatenby, Alison
Consultee Full Name	Alison Gatenby
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS741
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 18:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan relating to the Thatcham NE Development as I believe that there are components of this plan that are as follows.</p> <p>SAFE AND SUSTAINABLE TRANSPORT</p> <p>I understand that the WBC state the policy is likely to have a positive impact on road safety as safe travel will be critical to an increase in opportunities for walking and cycling.</p> <p>However, the likely significant increase in traffic in the Upper Bucklebury area generated by the additional +4000 residents will result in an increase in serious accidents. This will certainly result in less likelihood of us using our local roads for these pursuits. Many of these roads are without pavements. Such a scenario will massively increase the dangers to the many walkers, cyclists & horse riders that use these roads. These are roads that our family use regularly for these pursuits. Many of these roads are without pavements. Such a scenario will massively increase the dangers to the many walkers, cyclists & horse riders that use these roads. This will result in an increase in serious accidents. This will certainly result in less likelihood of us using our local roads for these pursuits.</p> <p>HEALTHCARE</p> <p>I am concerned about the impact +1500 homes in this area will have on our already overloaded healthcare services. This will result in significantly increased waiting times at our local surgery for Doctors appointments, blood tests etc.</p> <p>I understand that WBC and the developers are proposing a new healthcare site to be built for this area. However, the purpose Healthcare Impact Assessment, nor provided evidence of having liaised appropriately with local healthcare facilities, local general practices and dental practices. Surely the provision of increased healthcare facilities to accommodate the additional +1500 homes to be secured before this project can be considered?</p> <p>In essence, the objective of WBC and the developers to improve access to the health service component of community health care, as they have failed to provide evidence for the provision of the required primary care medical facility. The impact of this on the community will be significantly negative.</p> <p>ENVIRONMENT</p> <p>I have major concerns regarding the impact that building so many new houses in this small area of countryside will have on the environment. I understand that the Bucklebury Parish Council have reviewed the background documentation provided by the WBC and BPC has concluded that there is no evidence to support claims that SP17 will have a positive impact on the environment. This will result in a significantly negative impact.</p> <p>We live in a beautiful area. I am concerned that the impact of the proposed 1500 houses (potentially 2500 houses in total) will result in significant issues to our environment with potential collateral damage to Bucklebury Common due to significantly increased footfall.</p>

	<p>on legally protected wildlife. Indeed, the LPR states its intent for SP17 to drive additional traffic (people & cars) into the area, which is likely to have a detrimental impact on the fragile ecosystems that people are currently working on to restore and nurture.</p> <p>The LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability. This impact is to be mitigated, no details have been provided regarding how this would be carried out.</p> <p>It is obvious that the policy is to build as many houses as possible in a small area of countryside, on a cost effective basis. There are no substantiated policies regarding mitigation of the impact on the local environment.</p> <p>INACCESSIBILITY OF DOCUMENTS</p> <p>The volume and complexity of documentation that one is expected to review when considering points to raise is overwhelming for any one person to deal with. Having spoken to numerous people in our community, many of them have stated that it is too costly and time consuming. Consequently, they won't be taking part in this process.</p> <p>A true consultation should involve two way communication open to everyone. In my opinion, the WBC is failing in its duty to consult on this. One wonders if this is deliberate in order to reduce the number of objections to the plan?</p> <p>In conclusion, I object to the proposed Thatcham NE Development for the aforementioned reasons. I believe that the proposed development of houses in an area of countryside that is not suitable, resulting in a significantly adverse impact on the local community and quality of our lives.</p> <p>The plan has various flaws, ambiguities and is full of unsubstantiated policies. Consequently it should be rejected.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hathor Property Limited (Represented by Turley Associates)
<p>Consultee Full Name</p>	Fred Schiff
<p>Consultee Organisation</p>	Hathor Property Limited
<p>Agent Full Name</p>	Mr Simon Packer
<p>Agent Organisation</p>	Turley Associates

Comment ID	PS1674
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Policy SP17 North-East Thatcham strategic allocation

	<p>3.34 The strategic allocation of 1,500 dwellings for North-East Thatcham as set out in Part 1 of the Regulation 18 Plan consultation. concludes that :</p> <p><i>“This option was originally to be taken forward and was included in the Reg 18 consultation as a considerable number of new homes and community infrastructure to support these. For the Thatcham community the potential impact the local community is considered too high, the number on the site is considered to be more acceptable. Therefore, this option will not be taken forward.”</i></p> <p><i>“This option was considered in light of the responses received to the Reg 18 consultation. The council considered that 2,500 dwellings in Thatcham was too many. In response, the council has reduced the number of dwellings, which still enables a strategic level of development which can provide for the needs of the community. It is noted, that compared to a higher number of dwellings, this option may provide for the education provision originally envisaged on the site, or the additional improvements to the site within Thatcham. However, a reduced number on the site is considered to be more acceptable.”</i></p> <p>3.35 Therefore, whilst it is still acknowledged that the scale of the development proposed is a significant opportunity of providing some infrastructure, the Council have conceded level of infrastructure provision is reduced, and therefore the extent of the sustainability advantages it could provide has been reduced.</p> <p>3.36 The allocation, if confirmed, will obviously require a detailed planning application and significant Masterplanning work, to be submitted and approved, as well significant infrastructure provision. Any dwellings can be constructed. It is clear that if confirmed the allocation will not be completed in the short-medium term of the LPR period.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide for housing supply.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucknell, William E
Consultee Full Name	William E

	Bucknell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS770
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 21:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

* No	
Please give reasons for your answer	<p>I understand the problems of allocations of development. However the inclusion of a large scale development in NE</p> <ol style="list-style-type: none"> 1. There has been insufficient consideration of Transport Issues caused by the size of the development not being into 2. Insufficient provision of Health facilities. 3. Insufficient provision of Education facilities 4. Insufficient provision of Sports Facilities 5. Negative impact on adjoining Common land. <p>Transport Issues</p> <p>The development has been grafted of Floral way and does not show how the additional traffic, which will be generated to the major employment, educational and shopping centres. This will create more traffic using totally unsuitable local on minor junctions. I live in <redacted> and the commuter traffic using the route through Upper Bucklebury rather than calming measures that could mitigate the increased traffic.</p> <p>Public transport in this part of West Berkshire is insufficient for the existing population and during the past few years bus There are no proposals for new public transport linking the development with transport hubs.</p> <p>Health Facilities</p> <p>In Chapel Row we have a good doctor's surgery. However due to increased demand the availability has reduced. Fu pressure The facilities.</p> <p>Education</p> <p>New Homes will have a serious impact on local schools and children will have to travel further a field to be educated to cope. Addition numbers will impact upon Local education.</p> <p>Sports Facilities</p> <p>More people will need new Facilities and there are not any provision for New Facilities. Any new facilities would have for informal recreation which will be at risk.</p> <p>Negative Impact on adjoining Common Land</p> <p>As I live on the <redacted> I am fully aware on the increased usage of the common. However, the increased use by ecology and public paths have deteriorated through over use. More houses have appeared on the common. The traf deterioration of air quality and abuse of byways. As mentioned in transportation issues the increase in Rat Running congested.</p> <p>In conclusion a very limited review of this plan quite clearly demonstrated that the extension to NE Thatcham is unso</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cooper, Hannah
Consultee Full Name	Hannah Cooper
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS795
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 21:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	OBJECTING to plan SP17 as it is unsound due to the following reasons and negative impacts: - I enjoy walking in the countryside and woodland in our local area. This countryside supports several fragile ecosystems and heathlands. I am also concerned about losing more of the natural habitat for our local wildlife. - With more residents and therefore cars, we will experience higher levels of pollution which affects the health of people and a higher chance of more accidents. - I currently use the Chapel Row GP surgery, which is already at capacity. The addition of these houses in the immediate first line of health care for doctor appointments.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Griffiths, Sharon
Consultee Full Name	Sharon Griffiths
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS799
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 22:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I write to object to the proposed Thatcham NE Housing Development as I find the proposal unsound on the following 1.0 Transport 1. There will be increased pressure on the existing highway infrastructure from the additional people in the new housing, public houses, and the walks across the Common 2. The housing development will generate increased traffic through the village which is already under pressure as a result of the settlements to local schools and for travel to the M4 and Reading. The roads locally have become rat runs avoiding traffic with this proposal. 3. This will generate further pollution and increased noise levels in a village setting within the North Wessex Downs AONB

4. Although there is a traffic calming layout in the village, this is in effect groups up cars, lorries, agricultural vehicles producing constant streams of traffic which at busy times can make the road difficult to cross at prime travel times. In the additional traffic movements from the proposed development will cause logjams as increased traffic slows down.
5. Also, as I recently witnessed there are instances where individuals are becoming impatient with the traffic calming traffic travelling through Upper Bucklebury due to frustration at the slowed traffic putting other local road users including especially the elderly, dog walkers and children along with their parents going to school at great risk. Increasing the will further prejudice and endanger the lives of the people who live here leading to further traffic calming solutions had after an accident has occurred.
6. Upper Bucklebury is at risk of having to have a fast streamlined roadway removing the traffic calming to cope with will destroy the character of the village.
7. The proposed scheme exacerbates an already dangerous problem as the route along Harts Hill Road between NE lacks pathways, street lighting and is a fast but narrow winding road. Surface water constantly runs down and across has the potential to freeze as happened earlier this year with increased traffic flow resulting in the likelihood of increased proposed development will also place increased pressure on Thatcham itself and the A4 between Newbury and Reading flooded with surface water runoff from the fields adjoining this road.
8. Traffic approaching Upper Bucklebury via The Avenue is already a fast road where many drivers chance their luck increased through traffic to Thatcham this will further endanger road users from speeding cars.
9. There is a lack of public transport serving the local communities and the increased housing will heighten this issue. places greater pressure on the road systems.
10. All the above is contrary to WBC Strategic Environmental Assessment objective 4 – to promote and maximise of and sustainable transport.

2.0 Environment

1. There will be major adverse impacts on the North Wessex Downs AONB from siting a major housing development the continuing enjoyment of the existing local community and the many visitors that the area attracts through all season walks.
2. Although the area already attracts many visitors the intensification of visits from the increased population from the will place pressure on the existing wildlife which may prove to be tipping point for the continued health of this fragile.
3. The existing ecosystems within the AONB are already fragile and just coping – the extra numbers of visitors will do fatally damage the remnants of old ecosystems reducing the quality and the purpose of the AONB.
4. It will also cause more roadkill of wildlife which is already frequent enough now.
5. This will in turn lead to greater traffic generation and the need for additional car parks to accommodate the increased additional car parks will eat into existing woodland / heathland and could also lead to increased antisocial behaviour.
6. For the above reasons new greenfield development abutting the AONB and the Common should be discouraged to possible existing biodiversity.
7. There is a lack of evidence of current supporting ecological research or assessments provided for the proposal. The an overall biodiversity gain from the scheme and lack of mitigation of the negative impacts new housing will have on Bucklebury Parish Council have undertaken their own investigations into the existing flora and fauna which has high position on this.

3.0 Lack of Strategic Gap between Thatcham and Upper Bucklebury

1. Each settlement needs to protect its individuality and so to prevent further development creep in the future by be protected from new development. This scheme is effectively allowing the blurring the lines between Thatcham and Upper individual settlements which in time will become merged allowing developer lead schemes being approved by appeal.
2. The northern edge of the Bath Road and Floral Way should be retained as countryside and protected to prevent do for the foreseeable future with an effective green belt established to lie between the 2 settlements.

4.0 Number of Houses

1. The number proposed has been misleading as the Plan now extends to 2039 rather than 2036 giving rise to 'at least clarity on the specific number proposed or the exact location of these houses within the red line boundary of the plan fact be a lot more and could lead to developer lead proposals increasing the minimum number.
2. The infrastructure which should be provided to support the estimated of new people in the area has not been sufficient education facilities, healthcare and recreational facilities and may not be delivered over the lifetime of the Plan.
3. Consideration of alternative sites especially brownfield sites should be preferred before developing this greenfield.
4. I understand that the basis for assessing housing requirements is undergoing a consultation process meaning that the WBC could be reduced if the consultation recommendations allow. In the light of this it is best that the results of the consultation that WBC should at least delay the consideration of the additional houses in this location if not stop it completely.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Griffiths, Richard
Consultee Full Name	Richard Griffiths
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS803
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 22:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object to the proposed Thatcham NE Housing Development as I find the proposal unsound on the following</p> <p>1.0 Transport</p> <ol style="list-style-type: none"> 1. There will be increased pressure on the existing highway infrastructure from the additional people in the new houses, pubs, and the walks across the Common 2. The housing development will generate increased traffic through the village which is already under pressure as a result of increased traffic from settlements to local schools and for travel to the M4 and Reading. The roads locally have become rat runs avoiding traffic with this proposal. 3. This will generate further pollution and increased noise levels in a village setting within the North Wessex Downs AONB. 4. Although there is a traffic calming layout in the village, this is in effect groups up cars, lorries, agricultural vehicles and produces constant streams of traffic which at busy times can make the road difficult to cross at prime travel times. In addition the additional traffic movements from the proposed development will cause logjams as increased traffic slows down the road. 5. Also, as I recently witnessed there are instances where individuals are becoming impatient with the traffic calming measures in the village, especially the elderly, dog walkers and children along with their parents going to school at great risk. Increasing the speed limit will further prejudice and endanger the lives of the people who live here leading to further traffic calming solutions having to be implemented after an accident has occurred. 6. Upper Bucklebury is at risk of having to have a fast streamlined roadway removing the traffic calming to cope with the increased traffic which will destroy the character of the village. 7. The proposed scheme exacerbates an already dangerous problem as the route along Harts Hill Road between NE Bucklebury and Thatcham lacks pathways, street lighting and is a fast but narrow winding road. Surface water constantly runs down and across the road which has the potential to freeze as happened earlier this year with increased traffic flow resulting in the likelihood of increased flooding. The proposed development will also place increased pressure on Thatcham itself and the A4 between Newbury and Reading which is flooded with surface water runoff from the fields adjoining this road. 8. Traffic approaching Upper Bucklebury via The Avenue is already a fast road where many drivers chance their luck. The increased through traffic to Thatcham this will further endanger road users from speeding cars. 9. There is a lack of public transport serving the local communities and the increased housing will heighten this issue. This places greater pressure on the road systems. 10. All the above is contrary to WBC Strategic Environmental Assessment objective 4 – to promote and maximise opportunities for safe and sustainable transport. <p>2.0 Environment</p> <ol style="list-style-type: none"> 1. There will be major adverse impacts on the North Wessex Downs AONB from siting a major housing development in the area, reducing the continuing enjoyment of the existing local community and the many visitors that the area attracts through all sea level walks. 2. Although the area already attracts many visitors the intensification of visits from the increased population from the proposed development will place pressure on the existing wildlife which may prove to be tipping point for the continued health of this fragile environment. 3. The existing ecosystems within the AONB are already fragile and just coping – the extra numbers of visitors will do further damage to the remnants of old ecosystems reducing the quality and the purpose of the AONB.

	<p>4. It will also cause more roadkill of wildlife which is already frequent enough now.</p> <p>5. This will in turn lead to greater traffic generation and the need for additional car parks to accommodate the increase. Additional car parks will eat into existing woodland / heathland and could also lead to increased antisocial behaviour.</p> <p>6. For the above reasons new greenfield development abutting the AONB and the Common should be discouraged to protect the possible existing biodiversity.</p> <p>7. There is a lack of evidence of current supporting ecological research or assessments provided for the proposal. There is an overall biodiversity gain from the scheme and lack of mitigation of the negative impacts new housing will have on the Common. Bucklebury Parish Council have undertaken their own investigations into the existing flora and fauna which has highlighted the importance of this position on this.</p> <p>3.0 Lack of Strategic Gap between Thatcham and Upper Bucklebury</p> <p>1. Each settlement needs to protect its individuality and so to prevent further development creep in the future by having the Common protected from new development. This scheme is effectively allowing the blurring the lines between Thatcham and Upper Bucklebury individual settlements which in time will become merged allowing developer led schemes being approved by appeal.</p> <p>2. The northern edge of the Bath Road and Floral Way should be retained as countryside and protected to prevent development for the foreseeable future with an effective green belt established to lie between the 2 settlements.</p> <p>4.0 Number of Houses</p> <p>1. The number proposed has been misleading as the Plan now extends to 2039 rather than 2036 giving rise to 'at least' rather than 'up to' clarity on the specific number proposed or the exact location of these houses within the red line boundary of the plan. The fact be a lot more and could lead to developer lead proposals increasing the minimum number.</p> <p>2. The infrastructure which should be provided to support the estimated of new people in the area has not been sufficient. This includes education facilities, healthcare and recreational facilities and may not be delivered over the lifetime of the Plan.</p> <p>3. Consideration of alternative sites especially brownfield sites should be preferred before developing this greenfield site.</p> <p>4. I understand that the basis for assessing housing requirements is undergoing a consultation process meaning that the number of houses WBC could be reduced if the consultation recommendations allow. In the light of this it is best that the results of the consultation that WBC should at least delay the consideration of the additional houses in this location if not stop it completely.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pike, Simon
<p>Consultee Full Name</p>	Simon Pike

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1336
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Status of the Thatcham Strategic Growth Study</p> <p>Policy SP17 states: “The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals with these principles have been positively responded to.”</p> <p>As explained in my representation on the wording of Policy SP17 as a whole, the word “will” has many different meanings and is completely ambiguous. The sentence only carries any weight if it is intended as a requirement – if it is merely an aspirational policy. Therefore, the word ‘will’ in this sentence MUST be replaced by “must”.</p> <p>This sentence therefore means that the Thatcham Strategic Growth Study is incorporated by reference into Policy SP17. The Council states: “The Thatcham Strategic Growth Study (TSGS) is a consultant’s report commissioned by the Council. The Council has used the TSGS to provide evidence in relation to various issues that relate to the local plan and all of these can be viewed on the Council’s website. It is therefore neither a development plan document nor a supplementary planning document. It was not formally part of the Regulation 19 Consultation and only forms part of the supporting evidence to the Regulation 19 Consultation. It has not been approved by any member of the Council nor, as far as I am aware, through delegated authority.</p> <p>The Thatcham Strategic Growth Study is an integral part of the draft Local Plan through incorporation by reference into Policy SP17. It is not formally part of the Regulation 19 consultation. Policy SP17 therefore is not legally compliant with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012’. It therefore also does not comply with the requirements of the Local Plan Involvement.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based	

<p>on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Status of the Thattham Strategic Growth Study</p> <p>[SP17 - first paragraph. Representation part of a wider rep for SP17]</p> <p>Paragraph 16 of the NPPF (July 2021) states that: “Plans should: d) contain policies that are clearly written and unambiguous and a decision maker should react to development proposals”.</p> <p>Policy SP17 states: “The Thattham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals with these guiding principles have been positively responded to.”</p> <p>This sentence is totally unclear and ambiguous, for four reasons: (i) There is no section of Thattham Strategic Growth Study titled “Guiding Principles”, and no section that could reasonably be interpreted as such. This study is effectively the set of ideas by one consultancy about one possible configuration for a development. (ii) The Study was based on a development of 2500 dwellings, and it is totally unclear how it might be applied to a development of a different scale, which aspects would be different and which would be unchanged. (iii) The Study includes the employment area south of the A4 (Policy ESA1 in the draft Local Plan) as an integral element of the development between SP17 and ESA1 in the draft Local Plan. (iv) The phrase “positively responded to” is completely meaningless in planning terms.</p> <p>As a result of this lack of clarity and ambiguities, a developer could claim that almost any proposed development meets the requirements in Policy SP17.</p> <p>Paragraph 6.63 of the supporting text to the policy contradicts paragraph 6.54: “6.54 In reviewing the vision for Thattham as part of the LPR, and to best understand how to plan for growth in Thattham, the Council commissioned masterplanning work (Thattham Strategic Growth Study (TSGS) 2020).” “6.63 Further detailed work will be required to develop a coherent masterplan or development framework to take the vision forward to be produced in collaboration with the community and other stakeholders”.</p> <p>It therefore appears that West Berkshire Council believes that the Thattham Strategic Growth Study is not coherent, and is not a development forward.</p> <p>I share this view. The Study Stage 3 Report contains a mix of hand-drawn sketches, numerous concept diagrams, maps, and a ‘concept masterplan’ that is not based on any landscape assessment. As highlighted above, the document does not provide a clear and consistent view and it is unclear to what extent the plans in earlier parts of the document are referenced from the ‘conclusions’ section.</p> <p>I suspect that the Study was produced to be a starting point for further stages of work, and not to be referenced directly in the Local Plan.</p> <p>Paragraph 6.59 of the draft Local Plan is misleading to claim that “community objectives which emerged during a community workshop”. The statement in paragraph 6.5 of the Stage 3 report that it is “building on principles established at a community representation workshop at this stage of the study” is incorrect, because the workshop participants did not collectively establish or endorse any principles.</p> <p>I was one of the Thattham Town Councillors who attended this workshop. We were given no advance notice of the nature of the workshop. The Town Councillors were spread among different ‘teams’, and there was no follow-up. The ‘results’ of this workshop were not taken as a considered view of the Council or of the community. In retrospect, the workshop seems more like a token exercise taken as a first step in a sincere attempt to engage with the community.</p> <p>I did not give my permission for a photograph of myself taken during the workshop to be included in the report, and I do not endorse the description of the workshop or of the report.</p> <p>The Thattham Strategic Growth Study is therefore unsound, because it does not comply with paragraph 16 of the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>As I propose in another representation, the word “will” in the first paragraph of Policy SP17 MUST be replaced by “may”.</p> <p>“The Thattham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals with these guiding principles have been positively responded to.”</p> <p>In order to make the Local Plan review legally compliant, the Thattham Strategic Growth Study needs to be reviewed and updated to reflect the delivery of 2500 dwellings, and the resulting ‘guiding principles’ then need to be incorporated into the draft Local Plan or a supplementary planning document. This needs to undergo public consultation in accordance with the Statement of Community Involvement. This cannot be a mere technical examination.</p>

	I cannot see how the Local Plan could be considered to be “ready for independent examination”. Therefore, in accordance with the Planning and Compulsory Purchase Act 2004, West Berkshire Council should submit it in its present form to the Secretary of State.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wight, Erik
Consultee Full Name	Erik Wight
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS815
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object please to the LPR's plans to allow the building of 1250-2500 houses to the North East of Thatcham. Thatcham is already completely underserved compared to Newbury and other similar towns as regards</p> <ul style="list-style-type: none"> • Doctors surgeries • Pharmacies – a big problem at the moment • Supermarkets • Shops – clothing, shoes, furniture • Parking • Post Offices – both counters and sorting office (the latter is terrible) • Road network <p>The traffic on the Relief Road has already massively increased over the 24 years that I have lived in North Thatcham out of Dunston Park onto the Relief Road because of the volume of traffic.</p> <p>The problems at the level crossing have also massively increased.</p> <p>Thatcham Post Office sorting office is already completely unfit for purpose and massively understaffed. Whenever we receive no post deliveries for a week. There are no covering staff at all.</p> <p>Thatcham Bath Road Doctors Surgery already has trouble recruiting doctors and has tremendous delays in answering they have stopped inviting ladies to Well Women Clinics because of staff shortages. That is plainly storing up health local population.</p> <p>Also our dustbin emptying has already gone from weekly to two weekly while we have lived here.</p> <p>I moved to North Thatcham in part because of its lovely semi-rural location. It would be a complete disaster to build on its beautiful trees, flora and fauna. We have already had to endure months of works directly across the Relief Road on what was previously a beautiful field and view.</p> <p>The air quality has already diminished tremendously while we have lived here, due to traffic pollution. That is a particular such as my son.</p> <p>Please do think again on those plans. We just do not have the infrastructure or resources at all in North Thatcham to</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Woodhouse, Gail
Consultee Full Name	Gail Woodhouse
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS823
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 21:44:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to this proposal as I believe it is unsound, that it will have a negative impact to the environment and potential road safety implications.</p> <p>We outline our objections below.</p> <p>Environment (AONB SP1 & SP 2) – the proposed development abuts Bucklebury Common and the North Wessex Downs AONB. The proposed new developments will be drawn to the Common and will significantly increase the pressures already evident on the Common and existing wildlife. Parking on and around the Common is already exceeding capacity, with verges being used during the winter months. The development is relatively close, not all residents will walk/cycle to the Common they are more likely to drive. The open spaces proposed will not be big enough or as appealing as the Common land within the AONB</p> <p>The response that "<i>The development would involve a significant amount of open space which would be expected to be used for recreation (and benefit the existing population)</i>" does not address the concern that an existing mature and diverse Common area within a housing development for dog walkers, cyclists, off-roaders, etc.</p> <p>Wildlife (SP11) - the impact on local eco systems and wildlife will be significant. Whilst plans identify mitigating actions to support sustainable development it is quite clear that this development of farmland and natural open habitat will destroy areas of wildlife. The open spaces proposed in the development areas will not be enough either for the wildlife or the residents. The loss of habitat is inevitable, will also impact wildlife on Bucklebury Common and the AONB.</p> <p>The response that "<i>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council has stated that the development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) for the AONB and which will provide the context within which any proposed development would need to conform. The LCA states there is no strong inter[1]visibility between the site and the AONB it does lie close to it and concludes that the site is not within the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation of the site.</i>" does not address the impact of bulldozing existing mature farmland, building and laying tarmac.</p> <p>Being "<i>landscape-led</i>" is a not a sound argument when you've squashed all the wildlife and the songbird, bee and butterfly and return in a 2-3 generation when we're being asked to protect our Countryside for future generations.</p> <p>Traffic (SP17, SP22) - Thatcham is already a bottleneck for traffic flowing through the town on the A4 between Newbury and Andover. A new road network with the proposed traffic calming, traffic lights and roundabouts, the impact of on the flow of traffic through the town above will have a knock-on detrimental effect on the local roads and quiet lanes in Bucklebury as the additional cars and lorries will</p>

chaos in and around Thatcham and the associated A4 area. The local lanes and roads which are designed with layout only local traffic will be used as short cuts through to Reading, Newbury and the M4 to avoid the A4 congestion. We note the proximity of the proposed developments to Thatcham Railway Station. The ability to get to the station at peak times is important. While we appreciate the plan places an emphasis on sustainable travel there is no requirement for residents to complete pedestrian routes may be included and built by the developers but in poor weather, the dark winter months and for children in their cars and further impact on the already congested road network.

There was **no response** to our Objection and we have subsequently found out that there is a plan for an undisclosed road onto Harts Hill which connects Upper Bucklebury, Cold Ash and Bradfield indirectly to Thatcham.

They also provide access to the M4 at Chieveley and Theale and act as a "rat run".

Cold Ash has no footpaths and a School where cars regularly park in the road and children are offloaded - this is unsafe. There are small Villages on B-roads which are in poor repair and are lined by Schools i.e. Cold Ash, Upper Bucklebury, Bradfield.

Flood Risk (SP6) - Recent flood alleviation works to the North of Thatcham have been put in place to protect houses in the areas most severely affected by the 2007 flooding event. The events will only increase. Whilst there are proposals for surface water down into the valley (SUDS) they are not designed to support the heavy volume of water from such a development. In extreme weather events which it is recognised will only increase in frequency and intensity, SUDS will simply release the flood management scheme adding pressure on it and increasing the risk of Thatcham flooding again.

The response that **"In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures are being developed. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way, part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP."** This all sounds good but they are tested who knows if they will work. Thatcham flooded in 2007 largely because of the relatively small development significantly larger and on higher steeper ground.

Pollution – the development will generate significant levels of light pollution again impacting on wildlife and the ecology of these natural pleasures away from the area. Notwithstanding the effect for local residents on their night sky.

Pollution - the volume of homes and associated transport requirements will generate increased pollution from carbon dioxide associated with population density. The clean air experienced on the Common and the AONB currently will be a thing of the past.

The response given does not address our concerns, the street lighting you can control is one aspect, Domestic lighting (in the season) are beyond your control. Cars and central heating fumes are also beyond your control.

Rail - While Thatcham railway station is within a reasonable distance of the proposed sites there is no capacity for additional parking. There is no reference to any consideration around improving the infrastructure networks around the railway station. The creaking system will be overwhelmed and fail. The trains currently stopping at Thatcham are governed by the length of the platform. Additional trains will require a further platform extension and will require the level crossing to be closed for longer periods.

Our Rail concern is not addressed in the response however the issue of increased traffic is recognised **"TA report a concern has been raised that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the development. Some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation measures used do show significant impacts along the A4 and Floral Way"** - it's impact is recognised but not adequately addressed.

"Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure is not supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the plan will be taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with providers"

Medical - Medical services in Thatcham Bucklebury Cold Ash Chapel Row and Bradfield Southend are already under strain. New services are included in the proposed scheme (GP surgery) however there is no obligation for these services to be provided. The need for the housing. Indeed, we believe these will wait until the demand reaches a specified level. In the intervening period existing surgeries and services already at capacity. We wonder how and when the NHS will be engaged on these people. The influx of thousands of families who will expect schools GPs and hospitals to take care of them.

Our concerns have not been addressed.

The provision of medical services is not within the gift of the Developers, only the NHS and ultimately the Department of Health control the funding for GP Practices and Dentists. These are over-subscribed in Thatcham and the surrounding districts. There aren't the Doctors, Dentists or Healthcare Professional to staff them. Don't build a future problem for existing residents that will present itself.

	<p>Observations</p> <p>These still stand, Thatcham remains a small town that has little or no investment over the years.</p> <p>By granting permission for this development the local authority is again devolving its responsibilities by placing the n infrastructure onto others. Before West Berkshire Council considers further development in Thatcham it should first c its commitment to invest in the area. Without this WBC will continue to face strong opposition to applications that see significantly while anticipating the infrastructure and investment will be made by others in their own timeframes.</p> <p>The response to our earlier submission does not reassure me, quite the contrary.</p> <p>The new undisclosed northern access from the development to Harts Hill and Upper Bucklebury giving cars access to avoid the congested A4 fills me with dread...</p> <p>We are opposing the North East Thatcham Development Proposal THA20.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bodsworth, Michael
<p>Consultee Full Name</p>	Michael Bodsworth
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS831
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I wish to object to WBC LPR Regulation 19 Plan Policy SP17 for the following reasons:- 1. Traffic. I'm concerned that the volume of traffic through Upper Bucklebury will increase significantly as a consequence of the development. Traffic from the new development will inevitably use the route through Upper Bucklebury as an alternative to using the main road if there is an exit at the north of the development onto Harts Hill road. There is also in the plan a proposed car park off Harts Hill road which will add to the problems of a road which is too narrow for the volume of traffic. 2. Consequential Damage to the Bucklebury Common.

	<p>With the number of additional people who would be within easy reach of Bucklebury Common it would lead to unacceptably high levels of pressure on the common and lead to unsustainable damage to an important eco system of national importance.</p> <p>3. Environment. This is the development of a "greenfield" land which has a high elevation and abuts an AONB which would have an adverse impact on the area and biodiversity.</p> <p>4. Pressure on Medical and Complementary Services. The medical and complementary services in the area only just cope at the moment so with the proposed development more people requiring these services it would inevitably lead to significant deterioration - more detail is required in the plan.</p> <p>5.Lack of Strategic Gap between Thatcham and Upper Bucklebury The development will significantly decrease the green gap between Thatcham and Upper Bucklebury and could set a precedent in the future resulting in Upper Bucklebury becoming part of Thatcham.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	I am not prepared to appear at the public enquiry if invited.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pocock, Matt
Consultee Full Name	Mr Matt Pocock
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS945
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Please add my objections to the proposed developments being considered to the North east of thatcham. This is in n current infrastructure will not tolerate it. For starters: 1.Schools. Kennet school currently has a massive 1,815 students. Both my children attend, and they cannot even sit down anyv eat. Adding to this number from the development just will not work, has this been taken into consideration and another secondary school to the area is Shaw House, which also is already heavily subscribed. 2 Doctors.

	<p>I live very close to the proposed development. I CANNOT get a doctor's appointment booked in less than 2 weeks, unless an emergency appointment. -And a lot of the time I am unable to do this. -Again, adding more numbers to an already over-extended medical practice will help nobody. Is a new doctor's practice being built?</p> <p>3 Drainage.</p> <p>With more concrete and residencies, less water will be absorbed and have to run downhill. We all can remember the problems because of this, is the drainage system to be upgraded?</p> <p>4 Traffic.</p> <p>I live on <personal details>, just the other side of the proposed development. Some mornings the traffic is queuing for the A4 being also very busy. Adding 2,000 odd extra houses just won't work, we don't currently have good enough infrastructure in the area.</p> <p>5 Parks and green areas.</p> <p>There are not enough as it stands, and access to the closest ones from my estate (which has none) is either across the road to the station or the skate park, both posing significant risk to any children trying to access them due to traffic (see point 4).</p> <p>Thatcham has over doubled in its size in the 35 years I've lived here, with very little increase in local amenities such as schools, etc,etc. I understand more housing is needed, but this proposal will add even more strain to an already overloaded council. AHEAD!</p> <p>Please add my name to the list of those objecting to this proposal. Thatcham cannot take any further developments without adequate current infrastructure and local community.</p> <p>I do hope the council sees sense on this and decides again to refuse it.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Gane, Adrian
<p>Consultee Full Name</p>	Adrian Gane
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS894
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 12:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	As a local resident, likely to be severely affected, I would like to OBJECT to this plan on the following grounds: 1. Principle - were permission to be granted the number of dwellings proposed will lead to an intolerable burden on the village. There have been a number of infill developments to the north of Thatcham over the years, as well as to many other villages in the area. Where will this all end ? As a general principle it would be better to redevelop former industrial units within current town boundaries.

	<p>The proposed site is also on the edge of an AONB and close to various SSIs - again highly questionable positioning</p> <p>2. Roads - many of the current roads in the area are either very narrow or very restricted B roads - and are already carrying intended volume. (A4, Cold Ash, Pang Valley etc) This will place new burdens of danger and emissions on the existing roads.</p> <p>3. Environment - it is undoubtedly the case that the development will completely destroy greenfield sites and their associated benefits. There is no proper mitigation plan, nor any proper offset plan. The plan is flawed in every way in this area and offers no real benefit. Given the inevitable road traffic volumes there seems to be only cursory lip service paid to increased CO2 emissions. The plan for development is an attractive one and shouldn't be carved up. Period.</p> <p>4. Services - this development and the precedent it sets will add more burden onto the provision of services in the area such as hospitals etc. How will this increased population be serviced? We are already paying the price of the extra homes built over the past 15 years that haven't had infrastructure support. Again this will exacerbate the parlous roads capacity issues.</p> <p>5. Precedent - if this is approved where next? Each approval merely encourages the next swathe of construction.</p> <p>Summary</p> <p>This plan is not fit for purpose. Too many houses are proposed, in the wrong place, with too much collateral damage, with no real benefit. It is a disaster.</p> <p>Given the current demand for new housing a more profitable approach in every way would be the redevelopment of the area. There are a number of well managed examples in the area - specifically along the A4 and along the railway line to Reading. If this plan is approved it will cause damage for generations to come and fundamentally wreck West Berkshires remaining greenfield. Those who live there.</p> <p><u>I would like to be invited to any public hearing in connection with this plan's review please.</u></p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I would like to be invited to any public hearing in connection with this plan's review please
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McQuillen, Kathleen
Consultee Full Name	Kathleen McQuillen
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS898
Chapter / Policy / Appendix Number	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:37:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	RE: NE Thatcham Development I object to this proposed development. Here are my key concerns: <ol style="list-style-type: none"> 1 With this scale of development increased traffic pressure is inevitable. With the proposed exit on to Harts Hill and via Burdens Heath to Cold Ash/Hermitage and the M4 and via Upper Bucklebury to Chapel Row. These roads are inconsistent with encouraging the use of safe walking and cycling. 2 Harts Hill is a notoriously bad road with frequent accidents. Funnelling more traffic in this direction is dangerous. 3 I understand that more houses are needed. However, the scale of this development is wholly out of reasonable amenities to cope. It merely continues with further residential development in the Thatcham areas which lacks a

	<p>that encourages and enables green travel within local communities and a viable local economy. It appears that targets without insightful thought as to how to create viable and environmentally sustainable local communities</p> <p>4 Thatcham has been blighted by high volumes of HGVs from the Colthrope site which was a fundamental strategic lives of Thatcham residents for decades. NET development only intensifies the out of balance nature of such la</p> <p>5 Please ban HGVs accessing major truck routes via Thatcham; they should be routed east to the M4.</p> <p>6 I would like to challenge WBC statement that "The policy is likely to have a significant impact on walking, cycling did WBC arrive at this unsubstantiated conclusion?</p> <p>7 I would like to challenge WBC on the detailed plan that will result in enhanced health care facilities for a significant WBC assumptions are unsubstantiated and not evidence based and joined up with other healthcare agencies.</p> <p>8 NHS dental provision in Thatcham is wholly inadequate today. WBC have not addressed how this issue will be population.</p> <p>9 The proposed NET development will cause harm to the Bucklebury Plateau Biodiversity Opportunity Area; however of this scale and impact. This is not acceptable.</p> <p>10 This is a greenfield development within a landscape setting of the NWD AONB. The enjoyment and protection of development of this scale. I challenge WBC to provide evidence to support the claim that this development will be environment.</p> <p>11 WBC proposal of 'country parks' normally means glorified dog toilets. This is no real amenity at all; only of limited place to avoid for everyone else.</p> <p>12 The provision for all educational ages is not thought through or substantiated. Over the past 3 years 14% of early in the UK. WBC can not simply ignore the wider policy issues and provision of early years facilities and impact for many to work opportunities.</p> <p>13 The children of Bucklebury should continue to have a choice of secondary school and not be shoehorned towards no sense.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Feurtado, Dom
<p>Consultee Full Name</p>	Dom Feurtado
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1304

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 13:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Roads - negative impact - lack of modelling or plan for the traffic that will be pushed from the development onto Harts Hill and through the local roads in Bucklebury, Chapel Row and Bradfield Southend. The route through this will become a "rat run" to get to the M4 and Farnham on the already busy A4 will not solve this. There will be a negative impact to both Thatcham and local villages. The increase in new properties plus the associated increased in deliveries, hgv's, visitors etc will also have a negative impact on the environment.

- speeding is a huge issue in these local villages, and particularly on the road that runs from Harts Hill through Upper Southend to Common Hill. Nothing is shown in the plan help prevent this issue. Negative impact on local villages. Negative impact on road safety, both for road users and pedestrians.
- The junction where Union Road meets Common Hill, and where Common Hill then meets the A340 can not cope with particularly the A340 junction. This will be made much worse if the new houses are built and when this route becomes M4. Negative impact on road users. Negative impact on environment.
- the final stretch of Union road where it meets Common Hill is not suited for additional vehicles. It is already narrow and needs improvement. Negative impact on road users. Negative impact on road safety. Negative impact on environment.
- there appears to be little consideration for additional pollution the extra vehicles will produce. Negative impact on environment.
- there appears to be little concern for other environmental impacts additional cars will cause - noise, inconsiderate driving on residents in local area. Negative impact on road safety.
- there appears to have been very little thought on how to provide public transport so that not using a car is a sensible option for environment, local population. Negative impact on the environment.
- what is the car park on Harts Hill for if use of Harts Hill is going to be dissuaded? Negative impact on local population.
- I understand the SEA states the development will have a positive impact on safe travel. This clearly won't be the case. Negative impact on road safety as cars use country roads rather than A4. Negative impact on environment.
- I understand the SEA states the development will have a positive impact on walking, cycling and public transport. This is not how. Significant improvement in public transport needed so stop creation of driving "rat runs". Negative impact on local population and the environment.

Healthcare - negative impact

- it is already hard to get a GP appointment in this area of West Berks. Adding thousands of additional people to the situation worse. Relying on current GPs in Thatcham and local villages will not work. It will also promote the use of local GPs to proposed GP surgeries i.e. to Chapel Row. Negative impact on local population.
- proposal for GP surgery to be built isn't clear. Doesn't appear to have been discussed with local GPs, which surely has a negative impact on local population.
- how long would it take to get the surgery open? Acknowledged it is very difficult to establish a new GP surgery. Surely housing is completed. Negative impact on local population.
- this new development will rely on GP surgeries with a high elderly demographic, with higher reliance on healthcare services. This will have a hugely detrimental effect on current users. Negative impact on local population.

Environmental - negative impact

- obviously this development will have a huge detrimental impact on the local environment and ecology simply by paving over greenfield. Negative impact on environment, ecology, the AONB, local countryside, local native and protected species, on the fight against climate change.
- there will be significant protected species that will be negatively impacted regardless of measures put in place. Negative impact on environment and ecology.
- no evidence presented that it will have a positive impact, as appears to be stated in the proposal.
- replacing countryside with country parks! This appears a strange approach. Surely just leave it as countryside. Negative impact on environment and ecology.
- how will the country parks improve ecology and biodiversity? Negative impact on local ecology.
- the development should make an ecological improvement to the area, this plan doesn't clearly show any benefit. Negative impact on environment and ecology.
- a development of this size on a greenfield site will have a negative impact on national efforts to prevent climate change against climate change.
- a development of this size on a greenfield site will have a negative impact on local efforts to prevent climate change against climate change.

Education - negative impact

- the plan seems to miss significant aspect of end to end education provision. No clear plan for early years/pre-school provision, no clear plan for a secondary school. Negative impact on current population. Negative impact on overstretched education system and second provision.
- development will significantly impact secondary provision, with already oversubscribed schools. Likely to result in increased traffic on village roads. Negative impact on overstretched education system, particularly second provision. Negative impact on environment and fight against climate change.
- where will schools (if built) be placed? Obviously will need to be close to A4 and not near rural roads. How likely is it to be in the catchment?
- when will the proposed funding for school provision be made available? Surely the school(s) need to be in place prior to moving to the area.

Legal requirement - Inconsistent with current central govt guidance

- central government has removed the legal requirements for specific housing numbers to be met by councils, these are intended to understand why WBC is continuing to force through this huge development? What are the other external factors making it build between 1,500 and 2,500 houses in this area where roads, public transport, GPs and schools are already created?
- the removal of the legal requirement makes it a great opportunity to pause and produce a properly put together, more sensible plan for this area.

Character of the local area

	- this development will effectively make Upper Bucklebury part of Thatcham, eroding Upper Bucklebury village's unique potential to open up further developments that erode the countryside that defines and separates the various towns and villages from another. Ensuring villages remain just that, villages, is an important part of this part of West Berkshire. This proposal will erode the character of the area and on the local population.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tott, Gregory
Consultee Full Name	Gregory Tott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS924
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to object to the proposal to build 1500-2500 houses in NE Thatcham because I find the plan unsound. I object to the plan because the plan for secondary school provision is unsound. I have young children and I am concerned that in a secondary school there will not be space/ provision for them in local schools because the first set of houses could be not built or complete. It's also not clear how many pupils the new school is to cater for, where it will be located, the new school includes a 6th form (which I believe it will need). I can't see the evidence that West Berkshire Council education authority has made suitable school provision for the children that are likely to live in this estate or the families that remain in other parts of the estate once it's built.</p> <p>I am also concerned with how the health care services will cope with the increased demand. I haven't seen evidence of a health care assessment, and I'm concerned that Thatcham's two primary healthcare centres are already overloaded, it's significant that the waiting time for a GP appointment now than it was in 2019, how are they going to cope? Again, with a young family this is of great concern as it's difficult to get access to adequate health care services when they're needed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Valentine, Christina
Consultee Full Name	Christina Valentine
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS941
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 18:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to the unsound proposal to repurpose farming and grazing land in NE Thatcham for the purpose of p</p> <p>I feel that the proposed development is entirely unsound because the land is a greenfield site, the fields on Harts hill successfully used for growing crops and grazing livestock. I simply cannot imagine how the proposal can be consider</p> <p>In my opinion, the council should further review other available options and specifically focus on regeneration of brow</p> <p>Currently Thatcham as a town is found lacking in many fundamental areas in the way it caters for the existing popula</p> <p>example is already under pressure and a bridge over the railway line should be the absolute priority.</p> <p>The area has fallen badly behind in the services and amenities available to residents.</p> <p>I agree that an additional country park is a great idea I feel however that the green space marked as "country park" o</p> <p>scale and appears merely to be a box ticking exercise rather than an inspired plan to provide real value to residents. I</p> <p>welcome and the local council could take inspiration from other local councils such as Wokingham.</p> <p>In order for Thatcham to thrive the planners will need to make strategic moves to fill the existing gaps and by propos</p> <p>this massive scale in a very concentrated part of North Thatcham, it is a clear indication that the planners have failed t</p> <p>Harts hill road itself for example is already an accident black spot, any proposal increasing traffic and footfall volume</p> <p>As I am a resident of Harts Hill, I will personally be greatly adversely affected if the development goes ahead, it will o</p> <p>environment in which I live and will be hugely damaging to the wide range of wildlife living here ranging from deer, w</p> <p>of bats and newts.</p> <p>As a summary, I am objecting to the proposed large scale greenfield development and demand the local council adopt</p> <p>to be primarily on brownfield sites.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Treen, Julia
Consultee Full Name	Julia Treen
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS967
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to object to the WBC LPR Regulation 19 Development Plan on the grounds that the plan is unsound, and will re Bucklebury, and surrounding areas, should the plan be passed.</p> <p>Thatcham and its immediate surrounding areas have had many housing developments over the last 40 or 50 years, and on agricultural greenfield land, is not in the best interest of the local population. This plan was initially brought forward requirement to provide a set number of houses each year. This requirement was dropped in January 2023, but WBC this development.</p> <p>There is no accurate up to date data to support this plan such as traffic data, education support data etc. Without current plan should not proceed: it is being presented using incorrect data. I have major concerns over nursery, primary and schools are already at capacity. The development plan lacks detail on how local education needs will be met, support</p> <p>Thatcham and the local area has seen a big increase in traffic over the years. Obviously this development will bring which the road system is not capable of supporting: no plan exists to upgrade the local road system.</p> <p>As with many regions access to GP surgeries and dental practices is difficult around the Thatcham area. The development but has very little detail on how it will be supported and funded.</p> <p>In Upper Bucklebury we have had to tolerate a poor water supply over many years. This was eventually resolved when station replaced an existing one on Harts Hill Road. I have concerns over what impact the plan will have on our water electrical supply.</p> <p>My husband and I moved to Upper Bucklebury almost 40 years ago due to its rural location and abundance of biodiversity spread of Thatcham due to many large scale housing developments, which have significantly added pressure on biodiversity. We will lose our village identity as well as the precious biodiversity; the plan appears not to care about the legally protected area. This development plan will alter the area in such a way that I feel it will never recover.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Woods, Edward
Consultee Full Name	Edward Woods
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1027
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 22:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>I wish to object to the proposed North East Thatcham Development.</p> <p>This is a major development of the largest scale and is not supported by the local community. I understand and am concerned about the impact of additional housing and understand it needs to go somewhere. However this site can not support a development of this scale.</p> <p>Specific reasons for objection include:</p> <ol style="list-style-type: none"> 1. Roads Harts Hill Road is simply not suitable for the large amount of traffic. I regularly cycle from Thatcham station to Bucklebury with the existing level of traffic. It would be intolerably dangerous with the additional volumes. I am also concerned that the routes around Upper Bucklebury will become 'rat runs' The level crossing at Thatcham already causes huge delays which will only be worsened by this development. 2. Other infrastructure The power grid, water system and sewage are all already under pressure. A development of this scale will struggle to cope. 3. Schools As far as I understand it there is no budget from the developers for sufficient schooling. Thatcham is already over capacity and children have to travel to Newbury. It is unacceptable to build new housing without schools 4. GP surgeries As above I understand there is no provision for new NHS facilities, this makes no sense to me. 5. Surrounding area The proposed area is a critical 'green lung' between Thatcham and Upper Bucklebury and an important part of the amenity. The loss of dwellings in both settlements would suffer. Similarly the loss of biodiversity would be a major negative impact. 6. "The thin end of the wedge" I am also very concerned that any form of development would end up being significantly extended as is so often the case with 'the thin end of the wedge' any consent effectively to prevent this.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pocock, Katie
Consultee Full Name	Mrs Katie Pocock
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS877
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I also strongly object to this proposal for the same reasons outlined below by my husband,</p> <p>Please add my objections to the proposed developments being considered to the North east of thatcham. This is in n current infrastructure will not tolerate it.</p> <p>For starters:</p> <p>1.Schools. Kennet school currently has a massive 1,815 students. Both my children attend, and they cannot even sit down any eat. Adding to this number from the development just will not work, has this been taken into consideration and another secondary school to the area is Shaw House, which also is already heavily subscribed.</p> <p>2 Doctors. I live very close to the proposed development. I CANNOT get a doctor's appointment booked in less than 2 weeks, u emergency appointment. -And a lot of the time I am unable to do this. -Again, adding more numbers to an already ov cope practice will help nobody. Is a new doctor's practice being built?</p> <p>3 Drainage. With more concrete and residencies, less water will be absorbed and have to run downhill. We all can remember the because of this, is the drainage system to be upgraded?</p> <p>4 Traffic. I live on Archangel Way, just the other side of the proposed development. Some mornings the traffic is queuing from A4 being also very busy. Adding 2,000 odd extra houses just won't work, we don't currently have good enough infras area.</p> <p>5 Parks and green areas. There are not enough as it stands, and access to the closest ones from my estate (which has none) is either across th station or the skate park, both posing significant risk to any children trying to access them due to traffic (see point 4)</p> <p>Thatcham has over doubled in its size in the 35 years I've lived here, with very little increase in local amenities such a etc,etc. I understand more housing is needed, but this proposal will add even more strain to an already overloaded c AHEAD!</p> <p>Please add my name to the list of those objecting to this proposal. Thatcham cannot take any further developments current infrastructure and local community.</p> <p>I do hope the council sees sense on this and decides again to refuse it.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Matthews, Rachael
Consultee Full Name	Rachael Matthews
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1055
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>As a resident of Bucklebury Parish I wish to raise my objections to the proposed development at North East Thattham Strategic Gap between Thattham and Bucklebury</p> <p>The land north of Floral Way has provided the gap between Thattham and Bucklebury, and breach of the strategic gap has led to the refusal of refuse planning applications in the recent past.</p> <p>Bucklebury is a rural parish within the AONB, whilst Thattham is an urban town, with Floral Way the boundary between the two. The proposed development will remove much of the strategic gap between Bucklebury and Thattham - urbanising the village and the edge of the AONB. This will have a huge detrimental effect on the landscape, light pollution, and fragile ecosystems that WBC are required to maintain. WBC are required to require the maintenance of settlements as separate entities. The proposed development will have a significant detrimental effect on the AONB and the North Wessex AONB. The natural beauty of the area will be irretrievably lost if the development goes ahead.</p> <p><u>Traffic</u></p> <p>A development of the scale proposed would lead to a significant increase in traffic, which has not been adequately catered for. The current road infrastructure will not be sufficient to support this level of increased level of traffic. It is an assumption that the A4, accessed via Floral Way; the A4 is already commonly overloaded at peak times, causing significant congestion which is experienced by both old and new residents would look to other routes. These routes would likely be through the Parish villages, particularly for rural single-carriageway roads with blind corners and many without footpaths, therefore ill-suited to coping with the increased traffic. The bus station and town centre are too far from the development, so people will continue to use their cars, further clogging the roads. The proposed development will not meet the requirements, and doing little to help WBC achieve its Carbon Neutrality targets.</p> <p><u>Education</u></p> <p>The provision for education is not clearly defined within the Local Plan Review (LPR). There are no details in the LPR on the provision for Primary Education is unclear and contradictory. Secondary school detailing is also inconsistent and incomplete. The sum of £15 million to be contributed by the developers to Secondary Education but there are no details on the location of the schools and hence no possibility of assessing its suitability.</p> <p>West Berkshire Council as an education authority has a duty to make arrangements for suitable school provision. However, the number of school years is not defined or evidenced in the LPR</p> <p><u>Healthcare</u></p> <p>West Berkshire Council and the developer appear to have neither arranged a relevant HIA nor provided evidence of consultation with local health care agencies or providers.</p> <p>The proposed North-East Thattham development site is unsuitable for NHS primary care with local practises not having the capacity to cope. The proposed development will not mitigate the burden 1500 or more new houses will make on a local NHS struggling to cope.</p> <p><u>Conservation</u></p> <p>The proposal would do significant and irreparable damage to the biodiversity and fragile ecosystems of Bucklebury and Thattham, including a number of protected species. The proposal fails to meet the WBC core objective of protecting and enhancing the natural environment and biodiversity habitats. The original Thattham Growth Plan had a vague proposal for 2 country parks inside the Bucklebury parish. Now in the updated SP17 text these parks have been downgraded to undefined 'community parks' which highlights the importance of given to protecting the natural environment and public enjoyment it.</p> <p>The LPR's own sustainability Appraisal, which suggests that SP17 will have a negative on environmental sustainability (largely by ignoring the environmental consequences in favour of social and economic benefits) show that the proposal will not analyse and address the consequences of this development.</p> <p>I feel the council should take the opportunity, as others have, to pause the plan making and to bring forward a revised Local Plan Review guidance when this comes in later in 2023.</p> <p>I would like to reiterate my objections to the proposal at Thattham North East as part of the review of WBC's Local Plan</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Shearn, Jeremy
Consultee Full Name	Jeremy Shearn
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1059
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Morris, Colin
Consultee Full Name	Colin Morris
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1069
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I write to object most strongly about the proposed housing development along the A4 and up Harts Hill on the following. The size of the proposed development would be detrimental to the local area for the following reasons:</p> <ol style="list-style-type: none"> 1. Traffic congestion on the A4. 2. Consequent rat-running through the villages of Upper Bucklebury, Chapel Row, and Southend Bradfield, already a problem due to accidents. 3. Lack of schooling and doctors' surgeries to cope with the extra population. 4. Destruction of the Common which increases every year, due to users not adhering to the rules. The increased population makes it more difficult and impact the wildlife.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	Historic England
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS1166
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The opening to SP17 includes a commitment to masterplan the site and for the Thatcham Strategic Growth Study (TS) for the delivery of the site. As a connected point of detail, the final sentence of the first paragraph in policy SP17 does needs to be revised.

	<p>We note that the scale of development in SP17 has been significantly reduced from what is set out in the TSGS. Even if the principles in the TSGS could still usefully contribute to future proposals. That said, the TSGS's contribution on the area's historic environment is limited to only limited resonance on heritage.</p> <p>We note and support a proposed requirement in policy SP17 for a Historic Environment Strategy. However, we advise against the narrow treatment of listed buildings on the site. Linked with this it would be helpful to define the Historic Environment Strategy that this needs to be informed by heritage impact assessment, which the Council's HELAA states is required for area THA10. A Historic Environment Strategy could support effective place-shaping and enhance local character and the historic Dunston Park, Seige Cross and the land around Colthrop Manor), if it were to connect with <u>all</u> elements of the site.</p> <p>We suggest revised wording below, which that responds also to the lack of reference to archaeological assessment that is included in the HELAA associated with different sites within SP17. We note that the TSGS stage 3 report states: "In settled places in the country, archaeological remains are likely. The site displays varied potential for unearthing historical remains that indicate the presence of Palaeolithic and Mesolithic flint working, and the potential for Iron Age workings related to a series of earthenworks are visible on LIDAR scans in the north-western part of the site."</p> <p>We regard policy SP17 is unsound without suitable reference to archaeological assessment, which should also be agreed with an external adviser.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Historic Environment Strategy to demonstrate how the <u>site's historical development, archaeological remains, historic buildings, assets and parkland will inform the scheme and help to create a sense of place. It should:</u></p> <ol style="list-style-type: none"> 1 <u>be informed by proportionate heritage impact assessment, desk-based archaeological assessment and, if necessary, field-based archaeological assessment.</u> 2 <u>articulate how the proposed scheme would support an appropriate future use of the Listed Buildings in the area and how the significance (including demonstrating listed buildings in the area will be conserved and how the impact of the development will be considered).</u>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Dunks, Kevin
<p>Consultee Full Name</p>	Kevin Dunks
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS1078
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I would like to object to the planned development on the north east area of Thatcham on the grounds that the plans are impact on the area Particular areas that are unsound are:

	<p>Increased traffic in the area without improved roads and junctions</p> <p>No provision for additional healthcare and schooling.</p> <p>It will have a negative effect on the environment especially Bucklebury common which is an area of outstanding natural beauty. Any development into the common will do a great deal of damage to the vegetation and wildlife.</p> <p>I have lived in this area all of my life and do not to see it ruining will another massive housing estate destroying more</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Quirk, Simon
Consultee Full Name	Mr Simon Quirk
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1083
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	03/03/2023 18:21:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>As a resident of <Address Redacted> I would like to share my objections to the Thatcham North East Development. Due to the need for increased housing in West Berkshire and government targets, the chosen site for such a large project appears to be unsound. I am strongly against the proposals and believe that they should be reconsidered.</p> <p>Thatcham already has a high flood risk, with alleviation systems being created. This risk would predictably increase with the proposed systems in the proposed site area and the movement of ground, alongside the residential streets. The natural landscape and ANOB around the proposed site, would definitely be negatively affected by the project. Reduction of green space shows a negative impact on wellbeing, physical opportunities and natural ecosystems.</p> <p>Noise, light and air pollution would increase. Traffic congestion through Thatcham on the A4 and on the route to the M4, particularly at peak times, and especially when there are difficulties on the M4. It is difficult to see how this could be alleviated. The need for this increased volume of traffic, more roundabouts, widened carriageways and daily disruption. There would be a negative impact on the quality of life of present Thatcham residents.</p> <p>Demands for services such as dentists, GPs and pharmacies would be unprecedented. The present situation is already difficult. The budgets are increasing. Any proposed influx in residents would raise concerns regarding the proposal of only one secondary school.</p> <p>It has previously been agreed that the land between Floral Way and Bucklebury provides a natural gap, creating a conservation area. The elevation of the land suggests the possibility of three residential areas that would loom over the rest of Thatcham.</p>

	<p>than part of a connected town. The sheer size of the proposal would undermine the present town. Thatcham already has a high street and needs a different focus to improve its infrastructure, such as developing the high street and sports facilities. What other possible sites are there in West Berkshire that would not create the same negative impact on the surrounding villages?</p> <p>As already stated, I am strongly opposed to the proposals and hope that you listen carefully to the voice of the residents of the surrounding villages. I urge you to rethink and stop these plans.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Slatford, Will
<p>Consultee Full Name</p>	Mr Will Slatford
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1092
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	02/03/2023 05:34:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Traffic. There will be a significant, and potentially dangerous, increase in the traffic on the rural roads through Bucklebury from the site onto Harts Hill, but no wider traffic modelling is available. WBC assesses that there will be some displacement of traffic on other roads, but this will have a positive impact on road safety. Given the nature of these roads it is hard to reconcile a vast increase in traffic with a positive safety impact. Traffic flows over areas such as the Thatcham level crossing, through the M4 and A34 will just cause gridlock and unmitigated pollution in all areas.</p> <p>The plan falls dramatically short in this area.</p> <p>Healthcare. There is no detail into strategic healthcare planning included in the proposal. Given the development's proximity to the site, it is essential to include a Health Impact Assessment (HIA), but this does not appear to have been completed. There is little chance of a new HIA being commissioned, so the households within the site will have to be merged into already overstretched local practices. A new dental practices in the Thatcham area.</p> <p>The proposal fails to address any form of primary healthcare provision requirement.</p> <p>Environment. The proposed site will cause permanent damage to the Bucklebury Plateau Biodiversity Opportunity Area and development in the setting of the North Wessex AONB, and cause detrimental impacts to legally protected wildlife. The scale of these far reaching and irreversible effects, and the LPR's own sustainability appraisal accepts that SP17 will have a negative impact on sustainability. It is shameful that WBC entertain a proposal with no concrete mitigations for the devastation that would be caused. The vision for Bucklebury Common necessitates the minimising of extra human pressures upon it. By way of contrast, SP17 would cause an overspill of people to wreak havoc with the fragile ecosystems of the Common. The site would forever be a scar on the environment of the AONB. The proposal fails to meet the strategy to meet the requirement to achieve the required biodiversity net gains.</p> <p>The proposal fails in all areas of protecting the environment generally, and in legally required areas to improve biodiversity. There are no serious attempts to investigate, analyse and address the consequences of this proposal. It is unsound in this area.</p>

	<p>Education. There is no end to end plan for education within the plan. The plan does not provide evidence of the education plan, school location, the number of Form Entries at any school, timing of funding, and whether any funding is sufficient to provide education.</p> <p>It appears that less than a 6FE school is unsustainable, so it not clear as to what the education plan is. The current plan does not have enough houses to justify a new secondary school, so pupils would have to be crammed into already overstretched facilities. Thatcham's education problems rather than provide any form of answer. It is sadly laughable that the plan fails to detail any predictions for education demand, or predictions of the long term capacities of local schools. Obviously if the schools facilities (such as sports fields) would not be available to the community.</p> <p>WBC has a duty to make arrangements for suitable school provision. The LPR fails to provide evidence as to how this duty is as such is unsound in another major area.</p> <p>On 6th December 2022, the Secretary of State for Housing and Communities detailed that the housing number should be a starting point and not be mandatory, and that Planning Inspectors should no longer override sensible local decision making in favour of local constraints and concerns.</p> <p>The NPPF consultation which ran until yesterday also focussed on the need to take into account the character when planning to accommodate housing. Many sensible local authorities paused their plan making process accordingly. It would make no sense as this proposal might be trying to fit (badly) a need that is no longer present.</p> <p>I urge WBC to reconsider this unsafe plan. It is unsound in too many areas with too many questions unanswered.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Woods, Lesley
<p>Consultee Full Name</p>	Lesley Woods
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1306
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 12:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1653
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1653 Thatcham Town Council_SP17 SA_SEA.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The Sustainability Appraisal of Policy SP17 is so inadequate that it does not comply with the requirement of Paragraph 204 of the Assessment of Plans and Programmes Regulations 2004: "The report shall identify, describe and evaluate the likely significant effects on the environment of - (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme." Many of the 'scores' for the 'Effects of Policy SP17 on SA Objectives' are not justified by what is actually contained in the Sustainability Appraisal with the supporting evidence supplied with the consultation or provided by Thatcham Town Council in these representations.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The sustainability appraisal of Policy SP17 is extremely superficial, and provides no evidence to support the assessment and "should" are used to justify a benefit, when there is no evidence to support this.</p> <p>The assessment within the SA/SEA is inconsistent with the assessment for site THA20 (the previous name for NE THA HELAA 2020 (referenced in paragraph 6.55 of policy SP17).</p> <p>There is no appraisal whatsoever of the viability and accuracy of the points in the policy. Thatcham Town Council is providing justifications for the following:</p> <ul style="list-style-type: none"> - The provision for land for a secondary school is substantially below the minimum in West Berkshire Council's own policy for funding. - The health centre also appears to be too small to be viable, and West Berkshire Council has not complied with its funding policy. - Policy SP17 does nothing to rectify the current deficit of infrastructure in Thatcham, let alone provide the additional infrastructure for additional new residents. <p>These issues are considered in detail in specific representations by the Town Council.</p> <p>A detailed analysis of the sustainability appraisal of Policy SP17 is provided in the table below. The first six columns are the Sustainability Appraisal, and the last two columns are the comments of Thatcham Town Council and its assessment of the effects of the policy.</p> <p><See attachment - Thatcham Town Council_SP17 SA/SEA></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>A proper sustainability appraisal of Policy SP17 needs to be undertaken, followed by a new assessment of the reasons for the need (at different sites). The results need to be reflected in main Sustainability Appraisal / Strategic Environmental Assessment Tables 30 and 31).</p> <p>As justification, the Examination should consider whether the assessment of SP17 in the Sustainability Appraisal is consistent with the assessment of site THA20 in the HELAA.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thattham Town Council is the principal representative body of the community and is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the community of Thattham, and particularly on the substantial deficit of infrastructure in the local area. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what changes are required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thattham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thattham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1670
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thattham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1670 Thattham Town Council OPC drafting guidance June 2020.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Paragraph 16 of the NPPF (July 2021) states that: "Plans should: d) contain policies that are clearly written and unambiguous so that the decision maker should react to development proposals".</p> <p>The word "will" has many different meanings when it forms part of a modal verb, including:</p> <ul style="list-style-type: none"> • To issue commands, to express intention or determination; • To make requests, or invite; • To wish, desire or want. <p>Within the draft Local Plan, the word "will" is used with all three meanings. In some cases, the intended meaning is clear. This leads to considerable ambiguity, and the risk that the policy could be interpreted in the future in ways that are not intended or that the policy could be challenged through planning appeal.</p> <p>This ambiguity exists throughout the draft Local Plan, but the concern of Thattham Town Council is focussed on policy SP17. The Policy refers to the "Thattham Strategic Growth Study provides guiding principles for the delivery of the site". This is a study of the Past, Thattham Present and Thattham Future. Presumably, only the last of these is relevant to Policy SP17, so this</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	N/A
4. Proposed Changes	<p>It is necessary to replace the word “will”, where the intended meaning is a commitment or obligation. The two possible alternatives are “shall” and “must”. We prefer the use of “must”, as recommended in ‘The Office of Parliamentary Counsel: Drafting Guidance’; June 2020. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892409/OPC_drafting_guidance_June_2020-1.pdf (retrieved 12/02/2023) <see attached Town Council OPC drafting guidance June 2020></p> <p>Policy SP17 North East Thatcham Strategic Site Allocation</p> <p>Land as shown on the Policies Map is allocated for a sustainable low carbon, urban extension comprising of distinct landscape and connected and contributing to Thatcham, and woven through with natural habitats and links. The site is to be delivered as a whole to achieve a comprehensive development. The provision of all infrastructure, services, open spaces and co-ordinated. The Thatcham Strategic Growth Study Stage 3 Report Thatcham Future provides guiding principles for proposals <u>must</u> will demonstrate that these guiding principles have been positively responded to.</p> <p><i>[NOTE: we are unclear how “positively responded to” would be interpreted in planning policy terms, especially as the site was for 2500 houses]</i></p> <p>Homes</p> <p>The site is to be allocated for approximately 1,500 dwellings which <u>are expected to</u> will be completed within the period of 5 years. <u>must</u> will comprise of a housing mix which complies with the housing mix contained in Table 3 of Policy SP18. In addition:</p> <ul style="list-style-type: none"> • 40% of dwellings <u>must</u> will be affordable housing; and • 3% of dwellings <u>must</u> will be delivered via serviced custom/self-build plots. <p>Community</p> <p>The site <u>must</u> will provide:</p> <ul style="list-style-type: none"> • Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sq. metres); • 450 sq. metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care System; • Early years provision; • A 2.5 FE primary school on site and sports infrastructure requirements of the school, land to be provided and built out; • Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation <u>must</u> will be studied, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders; • 1,200 sq m community indoor facility to be used for sport and community uses with a variety of room sizes (cultural, meeting, etc.); • Outdoor formal and informal sports pitches and areas to meet the identified need of the development; • Open space to meet the needs of the development in accordance with Policy DM41; <p>Green Infrastructure</p> <p>The site <u>must</u> will provide a comprehensive green infrastructure network which will take advantage of the landscape features of the site. This network will comprise:</p> <ul style="list-style-type: none"> • A new community park linking Thatcham to the North Wessex Downs AONB; • Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes; • A comprehensive network of other accessible routes and connections within the development which provide walking and cycling routes; • Existing and new Public Rights of Way; and • Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain. <p>Transport</p> <p>Measures <u>must</u> will be included to improve accessibility by, and encourage use of, non-motorised transport modes. A detailed transport strategy will provide detail on how this will be achieved, including:</p> <ul style="list-style-type: none"> • Active travel improvements on routes between the site, Thatcham town centre and the railway station; • A vehicular through route; • Sustainable transport through routes; • Mitigation of the development’s impacts on the highways network with improvements to existing junctions where necessary and new access points for all forms of movement and transport to the site at locations to be agreed with the planning authority; • How adverse impacts on air quality will be minimised. <p>Sustainability</p> <p>Development of the site <u>must</u> will be <u>in accordance with</u> supported by a Sustainability Charter which will establish how the site will be achieved. This will be informed by:</p> <ul style="list-style-type: none"> • An Energy Strategy which <u>must</u> sets out measures to achieve a model low carbon development (following the requirements of Policy SP5 with Policies SP5 and DM4, including: <ul style="list-style-type: none"> • net zero carbon (regulated and unregulated energy) emissions for dwellings; • BREEAM ‘excellent’ non residential buildings; • on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and carbon offsetting. • An Integrated Water Supply and Drainage Strategy which <u>must</u> will set out: <ul style="list-style-type: none"> • measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water treatment.

	<ul style="list-style-type: none"> • surface water management approaches that could deliver net gain for Thatcham town, including use of on-site SuDS). • An Ecology Strategy which <u>must</u> will set out: <ul style="list-style-type: none"> • a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and linkages; • how priority habitats and ecological features will be protected and enhanced; • the creation of new ecological features; and • a site-wide management plan. • A Green Infrastructure Strategy which <u>must</u> will show how a network of multifunctional green infrastructure will be established; • A Public Rights of Way Strategy <u>which must</u> to demonstrate how existing Public Rights of Way will be protected and new ones will be established, including bridleway links and safe crossing points. • A Lighting Strategy which <u>must will</u> include consideration of dark skies, particularly in relation to the nearby North Downs Way, and measures to mitigate the impact on biodiversity. • A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and requirements for the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2019). • A Mineral Resource Assessment (MRA). • A Historic Environment Strategy <u>which must</u> to demonstrate how the listed buildings in the area will be conserved and development on their settings has been considered. <p>A Construction and Operations Management Plan (COMP) shall accompany any planning application on the site. The COMP shall include a pipeline from operational works, including the provision of an appropriate buffer.</p> <p><i>[NOTE: This final paragraph should not be a sub-bullet of Sustainability]</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thatcham Town Council is the principal representative body of the community in the area. The location of only new strategic site allocation in the draft Local Plan. The need for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the examination of the draft Local Plan for Thatcham, and particularly on the substantial deficit of infrastructure in the local area. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what changes are required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	BBOWT

Consultee Full Name	Daniel Tritton
Consultee Organisation	BBOWT
Agent Full Name	
Agent Organisation	
Comment ID	PS1252
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>The North East Thatcham Strategic Site Allocation is located within 1.7km of the Floodplain Special Area of Conservation (SAC). The size of the allocated site and its proximity to the SAC would trigger the need for a Habitat Regulations Assessment (HRA) to determine if the development of the site could have any impact on the SAC. The allocated site is covered by the Habitat Regulations Assessment of the West Berkshire Core Strategy (West Berkshire Council, 2010) and therefore there is no clear evidence that the allocation would not have an impact on the SAC.</p> <p>The site borders six LWSs all comprising woodland, the majority of which are Ancient Woodland. Part of the western side of the site supports the UK Biodiversity Action Plan Priority Habitat Wood-pasture and Parkland and therefore has the potential to support a range of trees. There is a significant risk of the woodland/parkland habitats being damaged or degraded should the site be developed due to potential construction impacts and increased pressure and threats from anti-social behavior, vandalism and fly-tipping. Sites of Special Scientific Interest (LWS) are at risk of being enveloped by development which would leave them in small areas of woodland. We would also like to see provisions of suitable greenspace, etc, to mitigate the impact on designated sites, especially associated with increased development within close distance of designated sites with highly sensitive ground nesting birds.</p> <p>We could not find ecological surveys or assessments for the proposed allocation to determine the potential impact on designated sites or identified the potential for protected species. Para. 158 of the NPPF requires Local Planning Authorities to base local plan policies on <i>up-to-date and relevant evidence</i> ... As such surveys are required to inform judgement on the scale and capacity of development sites. We consider this particularly important where there are designated sites such as the SAC and LWS's. The potential lack of ecological surveys could conflict with the NPPF and could result in allocations being found unsound.</p> <p>BBOWT believe that biodiversity has not been considered sufficiently in allocations and it is unclear how an allocation of this scale could be developed without a significant impact on the SAC.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Brooks, Donna
Consultee Full Name	Donna Brooks
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1377
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to formally register my objection to WBC LPR Regulation 19, the proposed development of 1500 to 2500 as I find it completely unsound for the following reasons:</p> <ol style="list-style-type: none"> 1. It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury. 2. The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham. 3. It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and fields. If large scale are approved there will not be any open rural areas left for future generations to enjoy. 4. The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain. 5. The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven and wrong. 6. According to the Transport Assessment paragraph 3.26, <i>'The access arrangements for the Northern end of the Northern junctions on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause problems for this so I am unsure as to why this has been stated. Please can you share these with me? How can increased traffic on an already dangerous and busy road (without the development), be seen as not causing a problem?'</i> 7. I am also aware that there are drawings showing a new car park on Harts Hill. This again will increase traffic to an area which is highly likely to promote anti-social behaviour, illegal activities, fly tipping and littering which we see regularly on Bucklebury Hill. 8. In terms of <i>'reducing accidents and improving safety'</i> your assessment has concluded that <i>'the policy is likely to have a significant positive impact on walking, cycling and public transport as safe travel will be critical to the design of the site'</i>. Also regarding <i>'increasing opportunities for walking, cycling and public transport'</i> your assessment concluded <i>'the policy is likely to have a significant positive impact on walking, cycling and public transport designed with these in mind'</i>. I wholeheartedly disagree with both of these assessments and I have concerns with the assessment. Please can you provide me with the evidence and conclusions for both these assessments? Also, it's not just about the development, it's about the surrounding areas, villages and community which exist today and have done for years. What assessment has been done for these with the increased traffic? 9. Further to the above, this development will have a significant impact on traffic levels and the associated pollution to be increasing: <ul style="list-style-type: none"> • Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially along this road to the Primary School. • In particular the triangle containing my house, P&T panel Beaters and Sarb Garage, there are no paths, it is significant that increased traffic would result in harm to pedestrians. • Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes. • Increased traffic through ALL the surrounding villages in general, especially as there is a plan for an exit at the top of the village. This will significantly increase traffic towards Upper Bucklebury, Chapel Row, Bradfield, Cold Ash and Hermitage. <i>'displacement of A4 traffic onto wider rural routes such as Upper Bucklebury'</i>. This is a total understatement and a concern for road safety, especially as the roads are already inadequate, have no pavements and are extremely dangerous. The potential for serious/fatal accidents is already high and this proposed housing development and exit will mean a significant increase in the number of accidents. • Traffic on the route into Thatcham and Newbury. These roads approaching the station are already heavily congested and an event of any minor traffic disruption. 10. This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services which are overstretched. 11. Regarding healthcare, there is a significant lack of detail around strategic healthcare planning and the NE Thatcham area. I am aware, neither WBC or the developers have arranged or published a prospective Health Impact Assessment for this development. There is no engagement between the North-East Thatcham Development Consortium and local general practises. Why hasn't a new GP site being available will result in the three existing practises in the area being overstretched even further? Why has not provided evidence for the provision of a viable primary care medical facility. To add to this Thatcham Dental Practice providing dental care for the local population, this will also get worse with the proposed development. 12. Regarding the environment, there will be damage to the Bucklebury Plateau Biodiversity Opportunity Area and the surrounding countryside. This development will also destroy the enjoyment of the local countryside by local communities in terms of Downs AONB and will cause negative impact to legally protected wildlife. There is no evidence to support claims that the development will have a positive impact on the environment but instead it will have a significant and serious negative impact on the overall environment and sustainability. Environmental sustainability is defined as: <i>'the ability to maintain an ecological balance and conserve natural resources to support the wellbeing of current and future generations'</i>. I am honest to say that WBC is not protecting the sustainability of our precious environment. In addition, as far as I am aware there is no assessment that has been done to analyse and address the negative environmental consequences. Why not? 13. Regarding education, within the Local Plan Review the provision for Nursery, Early Years, Infant and Secondary school education has been clearly defined. The provision for Primary and Secondary school education is unclear and contradictory. WBC, the developers and the local community have not provided any evidence to support the provision of a viable primary care medical facility.

	<p>duty to make arrangements for suitable school provision. How this obligation will be met across all school years has the LPR. The plan for the schools needs to take priority and should be confirmed before any housing development is likely that houses will be built and no additional school provision will be provided, leading to oversubscribed schools and for our children. The LPR talks of provision of school fields however no evidence for funding or a suitable location (a space and air polluted A4 does not suffice as suitable) has been identified by the WBC or NE Thatcham Development Committee.</p> <p>14. The development will significantly increase the noise and light pollution to the Bucklebury residents. There are no other options.</p> <p>15. There is no evidence that this development will enhance Thatcham town centre (or the area in general).</p> <p>16. It is not likely to attract new businesses to the area or create or significantly increase employment.</p> <p>17. The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development will take up the site.</p> <p>18. There is now particular focus within the Consultation National Planning Policy Framework on taking into account the need to assess how much housing can be accommodated. As a result of this, several local authorities have paused their plans to await the outcome of the consultation on the basis that a <i>lower housing requirement could be applicable to the plans planned for</i>. Although I am completely against the NE Thatcham housing development, I would ask that WBC should consider (if they have), to hold on the plan and present a revised plan in line with the updated planning guidance when this comes in. To conclude, this development is unnecessary, inappropriate, and ill-conceived and should be rejected.</p> <p>Please do not take the opportunity to live and play in our beautiful countryside away from our families today and future generations. Thatcham housing development go ahead.</p> <p>Observations</p> <ol style="list-style-type: none"> 1. Why is WBC not writing to all residents to make them aware of this development and encourage/seek comments from a wider audience as possible? 2. Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and the development. Consideration of this approval now certainly seems to totally contradict this stated commitment. 3. Finally, why is WBC are now considering this development when a previous application was rejected by the secretaries?
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I am prepared to appear at the public enquiry, if invited.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury & District Ornithological Club
Consultee Full Name	Newbury and District Ornithological Club
Consultee Organisation	Newbury & District Ornithological Club
Agent Full Name	
Agent Organisation	
Comment ID	PS1254
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 09:35:00
Attached Files	Ornithological Club Map.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	No

the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

This letter is to set out my strong **Objection** to the revised Local Plan because it is fundamentally Unsound and fails

- **Democratic process and Timing**
- **Damage to the Environment**
- **Education provision**
- **Transport infrastructure**
- **Healthcare provision**

I set out further details which I hope will be fully taken into account in the sections below and wish to make **personal Inspectorate** on each of the topics. My representations are made against the tests of soundness as set out in paragraphs that plans are 'sound' if they are:

- Positively prepared — providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs in accordance with agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical, with achieving sustainable development;
- Justified — an appropriate strategy, taking into account the reasonable requirements of the community and proportionate evidence;
- Effective—deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy — enabling the delivery of sustainable development in accordance with the policies and statements of national planning policy, where relevant.

The LPR is unsound as it fails against each of the tests as set out above in numerous areas of the plan. The failings are summarised below

- **The LPR is not positively prepared** and would not achieve the goal of sustainable development for West Berkshire area.
- **The LPR is not justified.** Many of the grounds for assessment of impacts and benefits lack credibility and are not Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation represents an appropriate strategy for WBC.
- **The LPR is not effective.** There is no evidence that the development of 1,300 homes at North East Thatcham within the plan period.
- **The LPR is not consistent with national policy.** In many instances the allocation for development of North East Thatcham would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB. The impact of development under policy SP17 through the sustainability appraisal is fatally flawed and is not a matter that can be corrected through modifications to the plan. The process for selection of North East Thatcham as a development site is set out below.

In addition all aspects of the plan where greenfield sites are used have a negative impact on the locations itself and will hugely affect the local environment, wildlife species and the health and wellbeing of residents with such a dramatic in result.

Overview of key subjects for my Objections are:

- Democratic Process and Timing
 - o The consultation, selections process and appraisals have all been severely flawed, lacking in evidence
 - o The decision making is undemocratic by failing to obtain full council sign off after Regulation 19 consultation and by not consulting the Secretary of State
 - o Government consultation for the NPPF is currently underway, is likely to reduce housing requirements for councils and will be by proceeding when they should pause the development of the local plan
 - o Number of houses for NE Thatcham is now "at least 1,500"— From an initial site assessment of 2,500 of which 1,200 were allocated for the period, this has now in fact increased to 1,500 houses because the Plan extends to 2039 rather than 2036 (as originally intended)
 - Environment
 - o Lack of strategic gap between Thatcham and Bucklebury—Thatcham and Upper Bucklebury will effectively merge and lose its identity
 - o Consequential damage to Bucklebury Common — increased footfall; increasing damage to an ecosystem of national importance
 - o Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive impact and overall sustainability
 - o A 'Country park' — this has a specific accepted definition which is not met in this Plan. The three small, isolated areas within the boundary have no meaningful environmental value or commitment to exclude subsequent development
 - Education
 - o Unacceptable pressure on secondary schools — Kennet is already over-subscribed; accommodation for additional schools has not been specifically stated
 - Transport
 - o A severe increase in traffic through Upper Bucklebury and other villages will be dangerous; WBC propose a new road to reduce traffic in and out of the northern end of the development, and a car park, also on Harts Hill, both highly inappropriate
 - o Severe additional congestion on the A4 will be bad for citizens and business
 - Healthcare
 - o Unacceptable pressure on medical & complementary services—additional GP surgeries are not part of NHS strategy

Specific Objections WBC's process and timings

Government consultation on the NPPF

The NPPF consultation launched in December 2022 runs until 2nd March, 2023. The Consultation Version of the NPPF (2022) Method for calculating the housing requirement (as used by West Berkshire for the regulation 19 version of the plan)

and should only be the starting point for local plan. There is a particular focus within the consultation NPPF on taking area when assessing how much housing can be accommodated.

Therefore, it is unacceptable that West Berkshire are continuing to consult on the current version of the local plan, the final version of the plan to be brought back to them for before it is submitted to the Planning Inspectorate for examination.

On the back of this announcement, several Local Authorities have paused their plan making process whilst they await guidance on the basis that a lower housing requirement could be applicable to the plans than the one currently being planned.

We feel that the council should take the opportunity, as others have, to pause the plan making and to bring forward a new local plan with updated planning guidance when this comes in later in 2023.

Specific Objections: Healthcare provision

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to refer the proposal to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is no detail or insight into strategic healthcare planning.

Proposals for a major development that is likely to have a significant health impact in relation to its size and location, require a Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. To date, no HIA has been carried out. How the proposals for development have been discussed with health service providers regarding impacts on primary care is not clear. Development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the development. It is of concern that neither V&A nor the developers appear to have arranged or published a prospective HIA specific to the proposed development. Public Health England and private stakeholders respectively, appear to have arranged or published a prospective HIA specific to the proposed development.

Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy was developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire West Health and Wellbeing Consortium. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to determine the impact of the development associated with new development. It is of concern that there appears to have been no direct engagement between the North-East Thatcham Development Consortium and local general practices.

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for a new practice. Figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an ever increasing demand in areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or in the future.

GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable. It would extend the range of services and primary healthcare professionals available on a single site. It would make no financial sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional costs and encumbrance working across two sites.

There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site, floor space or more practices could relocate. An enlarged primary healthcare site is required and might be better located close to the centre of the population to access and minimise traffic as the proposed NE Thatcham development is peripheral to the centre of the population. The proposal by Thatcham Town Council but has not been suggested in the sustainability appraisal of site options. Local practices are not suitable for an inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2022, Appendix 1.

The proposed North-East Thatcham development site is covered by the existing practice boundaries of Thatcham Moor (north of Chapel Row), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are run independently of each other, and their combined lists include approximately 27,800 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on primary care. There are more young children, a higher maternity workload, less local extended family support and there is initially a higher demand for primary care and repeated temporary pharmacy closures in Thatcham have further exacerbated pressure on primary care locally.

Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients registered for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents have access to a dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WOC or the developers have consulted any local dental practices regarding the potential impact of increased workload resulting from additional housing.

Reviewing the scanty healthcare recommendations within the Thatcham Strategic Growth Study (David Lock and Associates 2016), the present paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established to address concerns that social infrastructure may not be provided.' The Stage 3: Thatcham Future report published in 2016 provides no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at the heart of the health centre.

Conclusion:

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having approached relevant agencies or providers.

They are proposing a healthcare site that is unsuitable for NHS primary care and so have not made provision to mitigate the impact on the new houses will make on a local NHS struggling to cope.

The objective of WBC and the North-East Thatcham Development Consortium to improve access to the health service through new infrastructure has not been met as they have not provided evidence for the provision of a viable primary care medical centre.

Specific Objections: Transport

1 Increased Traffic

Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thatcham, a recurring theme was the impact on the villages. We sought assurances and were led to understand by WBC planners that traffic from the development would be managed via the A4. This is true but what they 'forgot' to mention was a plan for an exit at the north of the site onto Harts Hill. This was first mentioned in January when the Transport assessment was published: [Phase 2 Transport Assessment Report July 2021.pdf \(west Berkshire Council\)](#)

This is serious for us because traffic from, or to, the site is only going to go in one direction from this exit —towards Upper Bucklebury. This is between the traffic going through Cold Ash and the traffic through Upper Bucklebury and Chapel Row.

The proposed development will funnel traffic from the development and, WBC predicts, - 'some displacement of A4 traffic onto Upper Bucklebury'. This would be where the roads are inadequate, without pavements and have the potential for a significant impact on increasing opportunities for walking and cycling — under 'Safe' Transport.

1 Access and junctions

The Transport Assessment says at paragraph 3.26 : *'The access arrangements for the northern end of the NET site (with right turn lanes where appropriate) on both Floral Way and Harts Hill Road. Results from the modelling suggest that...* However, the document has no modelling results for this. There are drawings for all the other proposed junctions but not?

1 Car Parks

We have also seen drawings showing a new car park on Harts Hill. The purpose is a mystery but will surely add more to an already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park.

1 Safe and Sustainable Transport

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Plan for North East Thatcham against key Sustainability Objectives.

Objective 4 is — *To promote and maximise opportunities for all forms of safe and sustainable transport.* The SEA makes

- *'To Reduce Accidents and Improve SafeW council Assessment - The policy is likely to have a Positive Impact on walking, cycling and use of public transport. This will be critical to the design of the site.*
- *'To increase opportunities for walking, cycling and use of public transport'*

Council Assessment — Significant Positive Impact

Council Commentary - *The policy is likely to have a significant impact on walking, cycling and public transport as the Council has to take these into mind.*

Specific Objection: Education - Schools and Sports Fields Provision

1 Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the Plan. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education facilities for the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to assess the impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are no details in the LPR of the provision for Nursery or Early Years education. Policy 5P17 NE Thatcham Strategic Environmental Assessment states that 'the site will provide Early Years provision'.

The provision for Primary school education is unclear and contradictory. There is no data or evidence on the planned primary school requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. Even if this is available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state the location of the school or place provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The current situation for secondary school students from Bucklebury is that they have a choice of either The Downs or Bucklebury. Both are in the catchment area for both.

Where schools are oversubscribed those children who live nearer to the school are given precedence. This means that those from Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is inconsistent, incomplete and contradictory on the provision of secondary schooling in and around Thatcham. It is inconsistent with the supporting documentation. It proposes that the sum of £15 million be contributed by the developers to Secondary Education. It does not provide details of the location of the land to be provided and hence no possibility of assessing its suitability.

Please see the link below to The Thatcham NE Development Plan 2020 (part of the LPR Supporting documentation) <https://www.westberks.gov.uk/media/49799/Thatcham-Strategic-Growth-Study-Stage-3-Thatcham-Future/pdf/Thatcham-NE-Development-Plan-2020-3.pdf?m=63791050245970000>

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new (6-8 Form Entries) secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the NE Thatcham development (which proposed 2,500 houses), is not sustainable. Specifically:-

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The current provision proposed is not sufficient on its own to fill a 6-8 FE secondary school

5.19 secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. A school with less than 6FE is not considered feasible for a new school to be smaller than 6FE.

With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school is not sustainable in this location.

Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on a study in 2011. Clearly the use of 11 year old data is inadequate. The Development Plan states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary school demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably education provision will be in more detail as any development comes forward.

The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for a secondary school.

In summary, it is therefore clear that the plan for secondary school provision is 'unsound':

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Conclusion on Schooling:

West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision. This duty across all school years is not defined or evidenced in the LPR.

2 Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the road, the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If not, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public for other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide sports fields has not been supported. There is no evidence for funding or for a suitable location.

Specific Objections Environmental Issues

There are a number of **serious environmental threats** posed by the proposed Thatcham North East strategic development:

- 1 Collateral damage to the Bucklebury Plateau Biodiversity Opportunity Area [see attached Ornithological Club report] and heaths, in particular the Common;
- 2 Siting a major greenfield development in the broader landscape setting of the North Wessex Downs AONB threatening the open countryside by local communities;
- 3 Causing detrimental impacts to legally protected wildlife known to be present on the site, whilst erroneously assuming that measures can be taken after development e.g. through the vague promise of a 'community park'.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the LPR, there is no evidence to support claims that 5P17 will have a positive impact on the environment. By contrast, there is evidence to suggest it will have a significantly negative impact.

For example, the WBC states in the LPR that a Sustainability Charter is required to establish how 'policy requirements' will be met (including legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability). It is not 'informed' by various strategy documents (including one on ecology). Yet, the strategy documents either do not exist or are not available for the Regulation 19 consultation.

At least 4,000 people will be concentrated in the development site. They of course must have access to green space for recreation. The claimed provisions for green space cannot satisfy this demand on site. The original Thatcham Growth Plan had 'country parks' spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming the potential for significant recreation on its current land use. No details were provided about how they would be formed. The feasibility study by Bucklebury Parish Council, in lack of preparation for such country parks, not least that they should be merged, and properly managed and funded for recreation enhancement. Now, in the updated SP17 text the country parks have been downgraded to undefined 'community parks'. This is a commitment WBC has given to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will inevitably be impacts on adjacent areas. Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB, through a network which will 'take advantage of the landscape' to 'facilitate connection to the AONB, and include leisure routes'.

Meanwhile, the management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the site, working to restore and nurture.

In fact, the LPR's own Sustainability Appraisal accepts that 5P17 will have a negative impact on environmental sustainability and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated. There is no evidence on any such mitigation measures: the assumption is simply that they will somehow be found during the planning application process.

However, the very same Sustainability Appraisal suggests that the 5P17 policy is likely to have an overall positive impact on environmental sustainability (by absurdly ignoring the environmental consequences in favour of social and economic benefits that are anyway high priority for the area herein).

The overall thrust of the 5P17 policy is clearly to build as many houses as possible in a small area of countryside, without regard to how the environment — human and natural — will be improved or, if not mitigated. Despite all the money spent on consultation plans and justify the 'growth' requirement, there is no evidence of any serious attempt to investigate, analyse and systemically address the impacts. Everything will be all right because their own unsubstantiated policies say it will be.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan

Yes	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Osmond, Val
Consultee Full Name	Val Osmond
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1309
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:29:00
Attached Files	PS1309 Val Osmond - map.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>It is fundamentally Unsound and fails to deal with the following topics:</p> <ul style="list-style-type: none"> • Democratic process and Timing • Damage to the Environment • Education provision • Transport infrastructure • Healthcare provision <p>I set out further details which I hope will be fully taken into account in the sections below and wish to make personal representations to the Inspectorate on each of the topics. My representations are made against the tests of soundness as set out in paragraph 1.10 of the NPPF. It is not the case that plans are 'sound' if they are:</p> <ul style="list-style-type: none"> • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, taking into account the need to meet the requirements of any agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so, with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate and balanced evidence; • Effective—deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters rather than deferred, as evidenced by the statement of common ground; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies of national planning policy, where relevant. <p>The LPR is unsound as it fails against each of the tests as set out above in numerous areas of the plan. The failings are summarised below</p> <ul style="list-style-type: none"> • The LPR is not positively prepared and would not achieve the goal of sustainable development for West Berkshire area. • The LPR is not justified. Many of the grounds for assessment of impacts and benefits lack credibility and are not based on evidence. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of land represents an appropriate strategy for WBC. • The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham will be completed within the plan period. • The LPR is not consistent with national policy. In many instances the allocation for development of North East Thatcham would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB. The impact of development under policy SP17 through the sustainability appraisal is fatally flawed and is not a material consideration through modifications to the plan. The process for selection of North East Thatcham as a development site is set out in the plan. <p>In addition all aspects of the plan where greenfield sites are used have a negative impact on the locations itself and the surrounding area. It is extremely disappointing that this Plan has been produced in such an unprofessional way.</p> <p>Overview of key subjects for my Objections are:</p> <ul style="list-style-type: none"> • Democratic Process and Timing <ul style="list-style-type: none"> • The consultation, selections process and appraisals have all been severely flawed, lacking in evidence • The decision making is undemocratic by failing to obtain full council sign off after Regulation 19 consultation with the Secretary of State • Government consultation for the NPPF is currently underway, is likely to reduce housing requirements for the area recklessly by proceeding when they should pause the development of the local plan • Number of houses for NE Thatcham is now “at least 1,500” – From an initial site assessment of 2,500 of v. 2019. Over the Plan period, this has now in fact increased to 1,500 houses because the Plan extends to 2039 rather than 2036 • Environment <ul style="list-style-type: none"> • Lack of strategic gap between Thatcham and Bucklebury – Thatcham and Upper Bucklebury will effectively be joined and will lose its identity • Consequential damage to Bucklebury Common – increased footfall; increasing damage to an ecosystem • Greenfield development abutting an AONB with no up-to-date evidence nor strategy for positive impact and mitigation • A ‘Country park’ – this has a specific accepted definition which is not met in this Plan. The three small, isolated settlements settlement boundary have no meaningful environmental value or commitment to exclude subsequent development • Education

- Unacceptable pressure on secondary schools – Kennet is already over-subscribed; accommodation for a has not been specifically stated
- **Transport**
 - A severe increase in traffic through Upper Bucklebury and other villages will be dangerous; WBC proposed to allow traffic in and out of the northern end of the development, and a car park, also on Harts Hill, both
 - Severe additional congestion on the A4 will be bad for citizens and business
- **Healthcare**
 - Unacceptable pressure on medical & complementary services – additional GP surgeries are not part of the

Specific Objections : Healthcare provision

The North-East Thattham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, **no detail or insight** into strategic healthcare planning.

Proposals for a major development that is likely to have a significant health impact in relation to its size and location, for purpose **Health Impact Assessment (HIA)** in accordance with the current guidance from Public Health England. However, to how the proposals for development have been discussed with health service providers regarding impacts on primary development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the development. The impact on the health and wellbeing of existing or new communities will not be permitted. It is of concern that **neither** public and private stakeholders respectively, **appear to have arranged or published a prospective HIA specific to Thattham development.**

Tackling health and wellbeing requires a **multi-agency approach**. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to meet requirements associated with new development. It is of concern that **there appears to have been no direct engagement with the Thattham Development Consortium and local general practices.**

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand. Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is a shortage in other areas of the country. There is therefore **no realistic prospect of a new GP practice being established in Thattham** in the foreseeable future.

GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable and extend the range of services and primary healthcare professionals available on a single site. It would make **no financial sense for an existing local GP practice to set up a branch surgery** on the proposed new development because of the additional and staffing costs and encumbrance working across two sites.

There has been **no approach by WBC or the developers to any local GP practice to discuss an appropriate site** which one or more practices could relocate. An enlarged primary healthcare site is required and might be better located to improve access and minimise traffic as the proposed NE Thattham development is peripheral to the centre of the village to be supported by Thattham Town Council but has not been suggested in the sustainability appraisal of site options. However, with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2021.

The proposed North-East Thattham development site is covered by the existing practice boundaries of Thattham Mill (Harts Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). **All three practices are** two Thattham doctors' surgeries run independently of each other, and their combined lists include approximately 2700 under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand as there are more young children, a higher maternity workload, less local extended family support and there is initially a permanent and repeated temporary pharmacy closures in Thattham have further exacerbated pressure on primary care.

Thattham dental practices are unable to provide dental care for the whole population with a significant minority of patients out of area for NHS and private dental care. Thattham Vision, endorsed by WBC in 2016, confirmed only 60% of residents have a dentist (with 17.5% registered with a doctor outside Thattham). There is no evidence provided that either WBC or the developers have consulted any local dental practices regarding the potential impact of increased workload resulting from additional housing.

Reviewing the scanty healthcare recommendations within the Thattham Strategic Growth Study (David Lock and Associates), paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established as part of the process to address concerns that social infrastructure may not be provided.' The Stage 3: Thattham Future report published in 2016 provides no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at the heart of the health centre.

Conclusion:

WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having arranged a dialogue with health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and will not mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope.

The objective of WBC and the North-East Thattham Development Consortium to improve access to the health services in Thattham. The infrastructure has not been met as they have **not provided evidence for the provision of a viable primary care network.**

Specific Objections: Transport

1 Increased Traffic

Reviewing the comments by Bucklebury residents submitted at Regulation 18 about North East Thattham, a recurring theme is the villages. We sought assurances and were led to understand by WBC planners that traffic from the development would be managed on the A4. This is true but what they 'forgot' to mention was **a plan for an exit at the north of the site onto Harts Hill**. This was mentioned in a letter dated 6th January 2021 when the Transport assessment was published: Phase 2 Transport Assessment Report July 2021.pdf . However, the traffic from, or to, the site is only going to go in one direction from this exit – **towards Upper Bucklebury** where it will be managed through Cold Ash and the traffic through Upper Bucklebury and Chapel Row.

The proposed development will funnel traffic from the development and, **WBC predicts**, - '**some displacement of A4 traffic such as Upper Bucklebury**'. This would be where the roads are inadequate, without pavements and have the potential to be dangerous. Also point 4 below on increasing opportunities for walking and cycling – under 'Safe' Transport.

2 Access and junctions

The Transport Assessment says at paragraph 3.26 : '*The access arrangements for the northern end of the NET site proposed (right turn lanes where appropriate) on both Floral Way and Harts Hill Road. Results from the modelling suggest that the proposed access arrangements are sustainable.*' However, the document has **no** modelling results for this. There are drawings for all the other proposed junctions but why not?

3 Car Parks

We have also seen drawings showing **a new car park on Harts Hill**. The purpose is a mystery but will surely add more to an already a dangerous road and may also promote the night-time antisocial behaviour all too apparent in the car park.

4 Safe and Sustainable Transport

The **Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) which accompanies the Local Development Plan for the allocation of North East Thatcham against key Sustainability Objectives.**

Objective 4 is – To promote and maximise opportunities for all forms of safe and sustainable transport. The following are the key findings from the assessments:

- 'To Reduce Accidents and Improve Safety'

Council Assessment - The policy is likely to have a Positive Impact on road safety as safe travel will be critical to the success of the development.

- 'To increase opportunities for walking, cycling and use of public transport'

Council Assessment – Significant **Positive Impact**

Council Commentary - *The policy is likely to have a significant impact on walking, cycling and public transport as these are key objectives with these in mind.*

Specific Objection: Education - Schools and Sports Fields Provision

1 Schools Provision

The provision for education from Nursery, Early Years, through Infant to Secondary education is **not clearly defined** in the LPR. There is no coherent end-to-end plan: this therefore breaches the Council's obligations to provide education for all children in this provision, the Plan for a large new housing development is untenable.

The lack of a coherent Plan on Schools Provision across the various proposed developments also means that it is impossible to assess the impact on traffic. The siting of a secondary school to the NE of Thatcham would result in a significant increase in traffic in the area, not considered in the traffic plans and models in the LPR.

Pre-secondary School Provision:

There are **no details** in the LPR of the provision for **Nursery or Early Years** education. Policy SP17 NE Thatcham states that 'the site will provide Early Years provision'.

The provision for **Primary** school education is **unclear and contradictory**. There is no data or evidence on the plan for primary school entry requirements. The LPR proposes that the sum of £12 million be contributed by the developers to primary education. As no data available (the only data referenced is from 2011), it is impossible to assess if this is sufficient. It also does not state how many school place provision. Clearly, schools need to be available before houses are built.

Secondary Education Provision:

The **current situation** for secondary school students from Bucklebury is that they have a choice of either The Downs or Bucklebury if they are in the catchment area for both.

Where schools are **oversubscribed** those children who live nearer to the school are given precedence. This means that those from NE Thatcham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Downs.

The LPR is **inconsistent, incomplete and contradictory** on the provision of **secondary schooling** in and around Thatcham, in contradiction to the *Supporting documentation. It proposes that the sum of £15 million be contributed by the developers to secondary education. There are **no details of the location of the land** to be provided and hence no possibility of assessing its suitability.

Please see the link below to **The Thatcham NE Development Plan 2020** (part of the LPR *Supporting documentation) www.westberks.gov.uk/media/49799/Thatcham-Strategic-Growth-Study-Stage-3-Thatcham-Future/pdf/Thatcham_Strategic_Growth_Study_Stage_3.pdf?m=637910502456970000

The Thatcham NE development plan 2020, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new secondary school, half-funded by developer contribution.

Government guidelines are that Secondary Schools with less than a 6FE are not sustainable.

However, the Development Plan states that the **NE Thatcham development** (which proposed 2,500 houses), **is not sustainable without a secondary school**: Specifically :-

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town and the proposed is not sufficient on its own to fill a 6-8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. It is considered feasible for a new school to be smaller than 6FE.

With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school is not sustainable in this location.

Earlier in this same Thatcham NE Development Plan it was noted that the education provision exercise was based on **study in 2011**. Clearly the use of 11 year old data is inadequate. The Development Plan states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future primary school demand across the town, and has not attempted to predict the long-term capacities of existing schools. Inevitably education provision will need to be planned in more detail as any development comes forward.

The LPR Review to 2039, Policy SP17, now states that land (but not the Secondary school itself) will be provided for

In summary, it is therefore clear that the plan for secondary school provision is 'unsound':

- there is no satisfactory evidence of the number of pupils the school is to cater for;
- the location of a school is not clear;
- the number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable;
- the timing of the funding is not clear; and
- there is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education.

Conclusion on Schooling :

West Berkshire Council, as an education authority, has a duty to make arrangements for **suitable school provision** across all school years is **not defined or evidenced in the LPR.**

2 Sports Fields Provision

The LPR talks of the provision of sports fields. This raises two issues not answered in the LPR:

- Sports fields require flat ground. The only flat area of ground in the proposed site is that which is closest to the road, and is therefore exposed to the most traffic fumes.
- There is no funding earmarked for these facilities.

Although unclear, the LPR appears to assume that the school playing fields would also be available as Sports Fields. If not, then the playing fields will not materialise. Additionally, many schools are reluctant to open their playing fields to the public due to other concerns.

The objective of WBC and the North-East Thatcham Development Consortium to provide **sports fields has not been met. There is no evidence for funding or for a suitable location.**

Specific Objections : Environmental Issues

There are a number of **serious environmental threats** posed by the proposed Thatcham North-East strategic development:

- 1 **Collateral damage** to the **Bucklebury Plateau Biodiversity Opportunity Area** (*refer to PS1309 Val Osmond and heaths, in particular the Common;
- 2 Siting a **major greenfield development** in the broader landscape setting of **the North Wessex Downs AONB**, which will damage the character of the open countryside by local communities;
- 3 Causing **detrimental impacts to legally protected wildlife** known to be present on the site, whilst erroneously suggesting that appropriate measures can be taken after development e.g. through the vague promise of a 'community park'.

Taken together, and after a thorough professional review of the background documentation provided by WBC in support of the LPR, **there is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, it will have a significantly negative impact.**

For example, the WBC states in the LPR that a **Sustainability Charter is required** to establish how 'policy requirements for the legally required biodiversity net gains and the anticipated overall positive impact on environmental sustainability) will be informed by' various strategy documents (including one on ecology). **Yet, the strategy documents either do not exist or are not publicly available for the Regulation 19 consultation.**

At least **4,000 people will be concentrated in the development site**. They of course must have access to green space for their wellbeing. The claimed provisions for green space cannot satisfy this demand on site. The original Thatcham Growth Strategy proposed **two 'country parks'** spaced across the top of the slope, inside the Biodiversity Opportunity Area, claiming the potential for biodiversity enhancement over its current land use. No details were provided about how they would be formed. The feasibility study showed the complete lack of preparation for such country parks, not least that they should be merged, and properly managed to deliver the stated biodiversity enhancement. Now, in the updated SP17 text, the country parks have been **downgraded to uncultivated grassland**, which only proves how little commitment WBC has given to protecting the natural environment and public enjoyment of it.

Since SP17 has no proven plans for providing adequate green space and protecting biodiversity, there will be a negative impact on the environment in the surrounding visiting adjacent areas.

Indeed, the LPR states its intent for SP17 to drive additional traffic (people and cars) into the AONB. It provides a green route which will 'take advantage of the landscape' to 'facilitate connection to the AONB, and include leisure routes accessible to all'. Meanwhile, the management vision for Bucklebury Common is explicitly focused on not increasing human pressure on the site, and working to restore and nurture.

In fact, **the LPR's own Sustainability Appraisal accepts that SP17 will have a negative impact on environmental sustainability** on this greenfield site and therefore, would result in a negative impact on environmental sustainability which would need to be mitigated by whatever whatsoever on any such mitigation measures: the assumption is simply that they will somehow be found during the planning process.

However, **the very same Sustainability Appraisal suggests that the SP17 policy is likely to have an overall positive impact on the environment** – largely by absurdly ignoring the environmental consequences in favour of social and economic benefits that are outlined in other articles herein).

The overall thrust of **the SP17 policy** is clearly to build as many houses as possible in a small area of countryside, with little regard for how the environment – human and natural – will be improved or, if not, mitigated. Despite all the money spent on

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4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1679
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1679 Thatcham Town Council_Attachment 4_ADPP3.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes	No

* No	
Please give reasons for your answer	The regeneration of Thatcham Town Centre and the provision of social infrastructure in the town are recognised as important. The economic and social impacts are greater than the criterion of 'significant' in the Government Guidance "Strategic environmental sustainability appraisal". These should therefore have been considered specifically in the Sustainability Appraisal.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The current Local Plan states in the introduction to Policy Area Delivery Plan Policy 3:</p> <p>"Thatcham town centre will be a focus for regeneration, enabling the town to fulfil its role within the District's Hierarchy of retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages will be improved in the town centre."</p> <p>The policy itself includes the following objectives:</p> <ul style="list-style-type: none"> • Thatcham's services and facilities will be improved allowing the town to fulfil its role within the District Settlement Centres, serving the local population, not only within Thatcham, but also the surrounding rural areas. • The town centre will be regenerated with the redevelopment of the Kingsland Centre driving this improvement, providing a new environment and enhanced retail offer. This redevelopment is proposed to deliver approximately 17,200 sq.m of new space including, among others, retail, residential, office and community space. • The streetscape and public realm throughout the town will be improved, along with upgrades to the A4/Bath Road to enhancing Thatcham's image. • The range of leisure facilities within Thatcham will be expanded, utilising those at the existing Newbury Leisure Facility and providing opportunities for leisure within the town centre through any future regeneration projects. <p>The Infrastructure Delivery Schedule (2013) includes the following:</p> <ul style="list-style-type: none"> • A new library is 'necessary' as 'Library needs to be about 900 sq.m larger than current provision', at a cost of £1.5m. <p>However, none of this regeneration has materialised, no new developments have materialised, and the Newbury Leisure Facility Area Delivery Plan Policy 3 from the current Local Plan is provided as Attachment 4 to these representations (see <i>attachment 4 - Town Council Attachment 4_ADPP3</i>).</p> <p>The draft Local Plan states:</p>

	<p>6.52 Thatcham has experienced rapid population growth during the post-war period, expanding more than 5 times since accompanied by infrastructure growth in transport, and a considerable expansion in the built-up area to match the population. recent decades, the provision of social infrastructure has not kept pace with housing growth.</p> <p>6.53 The vision for Thatcham contained in the Core Strategy DPD (2012) was that Thatcham town centre would be the town to fulfil its role within the District's Hierarchy of Centres by improving the retail offer and enhancing of leisure and community facilities for all ages would be improved and encouraged within the town centre. The town would be providing a range of job opportunities and encouraging residents to shop and socialise locally.</p> <p>In the January 2023 Infrastructure Delivery Plan, the new library has been replaced by 'A new library / community hub' with no indication on when this might materialise. The only other significant proposed infrastructure developments for the North East Thatcham development.</p> <p>During the current plan period, the town will have grown by several hundred dwellings due to non-strategic development of regeneration' has materialised, and if anything has degenerated – the Kingsland Centre has not been redeveloped, closed, and the library might benefit from a disabled toilet. There have been no other significant compensating enhancements.</p> <p>The premise of Policy SP17 that Thatcham is able 'to fulfil its role within the District's Hierarchy of Centres' is fundamental to Policy SP17 and its assessment in Appendix 4 of the Sustainability Appraisal either incorrectly assess or ignore the infrastructure in Thatcham, and therefore cannot have assessed 'the area's objectively assessed need'. Policy SP17 is not justified. Policy SP17 also cannot be based on proportionate evidence, and is therefore not Justified.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>There needs to be a clear policy for the regeneration of Thatcham, and in particular its social infrastructure. This need must be completed in advance of any further housing development or at specified stages of construction. This could be Policy SP17 or a separate policy.</p> <p>The Infrastructure Delivery Plan is not sufficiently robust for this purpose. It is described as a 'living document', and the fact that it includes can 'die' at the discretion of the Council without any need for public consultation.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community and is the location of only new strategic site allocation in the draft Local Plan. The need for development is reliant on having adequate infrastructure. However, the regeneration promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the regeneration of Thatcham, and particularly on the substantial deficit of infrastructure in the local area. I am happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what is required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1710
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>There are a number of incorrect assumptions and inadequate and contradictory information in the studies on traffic at <u>Level Crossing at Thatcham Station</u></p> <p>The lived experience of residents of Thatcham is that the location of most serious congestion is the level crossing at Heath Lane. The queue can build to more than half an hour in duration, when there is an unfortunate combination of train movements. The impact on the local community and any increase in delays is completely unacceptable.</p> <p>The WSP study does not build this into its model. The West Berkshire Local Plan Review Phase 2 Transport Assessment states "the model also indicates that these queues clear when the level crossing gates are open", which is an obvious but incorrect assumption.</p> <p>It is clear that any increase in housing in Thatcham will result in a corresponding increase in traffic over the level crossing. The queues are located at the east of the town.</p> <p>Paragraph 110 of NPPF states:</p> <p>"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be taken into account that impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, should be limited to an acceptable degree."</p> <p>Thatcham Town Council is of the view that any adverse impact on the already unacceptable delays at the level crossing should be mitigated to mitigate this, because most of the journeys using the level crossing are not served by public transport and are too long to be served by a bus.</p> <p><u>Additional journeys by non-residents of NE Thatcham</u></p> <p>The traffic studies assume that any additional journeys will be generated by residents of the North East Thatcham development. The development proposes a secondary school with a large proportion of pupils who are not residents of the development. This and the development will generate a substantial number of vehicle movements during the morning rush hour.</p> <p>The "Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sqm) will generate additional vehicle movements, although the magnitude of this is as unclear as the intended use of these facilities."</p> <p><u>Queues on Floral Way/Heath Lane</u></p> <p>Paragraphs 3.26 and 3.27 of the West Berkshire Local Plan Review Phase 2 Transport Assessment Report (July 2016) state that "traffic queues on Floral Way might extend from the A4 back to Heath Lane – a distance of a mile. If that is the case, it is unlikely to reduce traffic delays to an acceptable level."</p> <p><u>Provision (or not) of through route for traffic</u></p> <p>The Thatcham Strategic Growth Study envisages several distinct neighbourhoods, with "Public transport through-route between neighbourhoods" (Stage 3 Study, figure 64). However, the West Berkshire Strategic Transport Model – Local Plan Forecasting Report (July 2016) did not include this route in its traffic forecast (Paragraph 2.4.8, based on Section 5 of the report by Transport Planning Associates). The development proposals include a link road through the site joining the A4 at Gables Way with Harts Hill Road, and the model should account for internalisation of trips and use of the link road."</p> <p><u>Impact of Policy ESA1 (Land east of Colthrop Industrial Estate, Thatcham)</u></p> <p>Outline planning permission has already been granted for this site for B2 and/or B8 development, addressing access to the site. "The application and provision of a Traffic Regulation Order prohibiting right turn movements from the access". This is to prevent right turn movements for vehicles leaving the site and heading east along the A4, as they will need to turn left and then turn back right. This need to be taken into account in the traffic modelling.</p> <p><u>Consistency of road and junction layout</u></p> <p>The Thatcham Strategic Growth Study shows Floral Way diverted into the development between the A4 and Harts Hill Road. However, the West Berkshire Strategic Transport Model – Local Plan Forecasting Report has assumed only the current layout in its modelling.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>The Strategic Transport Assessment should take the issues identified in this representation into account, and the traffic assessment should be carried out. The results of the Strategic Transport Assessment should then be considered in the Sustainability Appraisal (SA/SEA), prior to the submission of the draft Local Plan.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	<p>Thatcham Town Council is the principal representative body of the community and is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the examination of Thatcham, and particularly on the substantial deficit of infrastructure in the local area. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what changes are required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Griffiths-Eyton, Zita
Consultee Full Name	Zita Griffiths-Eyton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1253
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We moved to Upper Bucklebury from Newbury 5 years ago to live in a village and enjoy being part of a small community. Never would have thought that a development of this size could be built on our doorstep and could influence our life and grandchildren's.</p> <p>I understand that some(!) houses need to be built and there is a demand but to build that many in that location is a real problem.</p> <p>The biggest problem is the sheer volume that scares everyone in the vicinity.</p> <p>The developers won't care about the people already living here, they won't care how much extra pressure they put on the roads, dentists, pubs etc.</p> <p>Schools are mentioned in the development plan but would they be built before people actually move in, ready to take the children to surgery/ies to take all these families?</p> <p>To come back to our village, Upper Bucklebury with a primary school and sadly already some speeding through the village.</p> <ul style="list-style-type: none"> • would create a massive extra traffic going through our village, increasing noise and pollution levels • traffic to Thattham station is already chock a block • the boundaries of the new development are too close to Upper Bucklebury risking the village to be sucked in by Thattham • parking in Thattham is already an issue • the volume and frequency of trains going through Thattham station cannot cater for these proposed new residents • Who are these houses built for? Can the developers see 2500+ new job opportunities in the vicinity? The plan far outstrips the local economy. • there is a proposed country park. We already have one in Bucklebury. What effect would this have on that one? • traffic: there are children at Bucklebury Primary School from Thattham. Their school run would be hugely affected. What about the secondary school? • secondary school: Kennet School at Thattham is already struggling with capacity. We are in the catchment area but we don't have priority of getting a place over us as they will be built between us? Again when would the proposed secondary school affect current catchment areas?

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Atkins, Matthew
Consultee Full Name	Matthew Atkins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1510
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:18:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Overdevelopment/Settlement Boundaries - In my opinion, West Berkshire Council should be protecting the wonderful the county and extending settlement boundaries into the countryside, closing the areas/gaps between our towns and (e.g. & Bucklebury) will end the separation of communities, which the current settlement boundaries are designed to do, not those communities.</p> <p>Traffic - Thatcham, but specifically the roads within the NE area of Thatcham are already loaded. And developing the area will have a impact on the traffic in the area. Unfortunately public transport is not a option for many people in this area.</p> <p>Impact of the countryside / wildlife - This is a greenfield site, and was determined so for the very reason is should be protected. I object to West Berkshire Council reviewing and potentially changing this greenfield area in the local plan.</p> <p>Education - The education / schools are already beyond capacity and increasing the NE of Thatcham would be create a have a severely detrimental impact on the education system of our local children.</p> <p>Healthcare - The proposals to increase healthcare are no sufficient, and therefore proposed land for development would be three local healthcare provisions which are already beyond capacity.</p> <p>In summary, I strongly object to the local plan review of this area, and any future proposed development of the NE T</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Foulkes, Ciaran
Consultee Full Name	Ciaran Foulkes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1375
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to you to express my concern regarding the proposed development of North East Thattham along Hart's proposed plan as it is unsound. The plan does not specify in any detail the provision of much-needed infrastructure needed even before the allocation of up to 2,500 new homes. In addition specific provision to protect the local ecology this proposal to develop a green field site adjacent to an ANOB. If my presence is requested, I am prepared to appear at the meeting.</p> <p>I am very concerned that this plan does not provide adequate healthcare provision. The area of the proposed development contains GP practices at Chapel Row, Burdwood Surgery and Thattham Medical Practice. All three practices are already over capacity and need parking. This plan needs a specific provision for an extra GP surgery not just to be provided by the Buckinghamshire Integrated Care Board but one specifically to cater for the needs of this particular development and arguably should be provided in the development, in order to meet the goals of sustainability and allow people to walk and bicycle to services. There is a need for a pharmacy and with the closure of one of the pharmacies there are currently long queues in order to obtain most prescriptions. Specific provision for services should be made in the plan to make it a viable option.</p> <p>The plan does not adequately detail provision for education in the proposed area of development. There are no details for nursery or Early Years education. While the LPR proposes that the developers contribute £12 million to primary education, this money will go to existing or new schools and when any new schools would be built or extended. Moreover, there are no details of the planned number of schools or Form Entry requirements. Similarly the plan merely suggests that the developers will provide for the provision of secondary education. However, there are no details of where additional land for schooling would be located, indeed even the timing of the funding. There is no satisfactory evidence of the numbers of pupils the school is to cater for, the desperate need of additional secondary schooling, the number of form entries is not defined in the plan and anything that is not been categorised as not sustainable by the government.</p> <p>There is absolutely no evidence that a major greenfield development abutting and adjacent to the North Wessex Downs will have a positive impact on the local environment. On the contrary, unless managed appropriately, increased human activity is detrimental to the open spaces. The management of Bucklebury Common has been working hard to restore the natural habitat and legally protected species including bats, newts and many species of ground nesting birds. While the plan intends to protect Bucklebury Common it has no mention of how the Council will manage the human and canine impact on this fragile ecosystem, litter bins or managing fires which have been increasingly frequent as a result of climate change and the ensuing dry conditions are a risk to the ancient woodlands. Without adequate management of human impact, there is a potential that the enjoyment of Bucklebury Common will be lost to future generations.</p> <p>The plan is also unsound because it does not provide adequately for traffic provision. With limited public transport options, people will have to drive. Each household will in all likelihood have at least two cars out of necessity, which would potentially increase traffic on the local roads. The plan specifically states that increased traffic from the proposed development will be encouraged to travel to Theale and Hermitage (junctions 12 and 13 of the M4 respectively) via Broad Lane and surrounding roads. These roads are paved pavements or hard verges. The small lanes surrounding Broad Lane are all single file lanes with hedging and limited parking. They are currently deeply rutted with potholes, which makes it necessary for drivers to swerve or stop suddenly making them dangerous. They are all heavily used by cyclists enjoying the countryside. Without cycle lanes, these roads will become too busy for cyclists. The negative impact of traffic emissions on children walking to school in Upper Bucklebury and Bradfield Southend has been highlighted. While the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) highlights the objectives of "Resilient and Safe": and "To increase opportunities for walking, cycling and use of public transport", there has been no adequate provision for footpaths, cycle lanes or adequate lighting for the current roads to cope with the higher volume of traffic.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If my presence is requested, I am prepared to appear at the public enquiry.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Carson, Jonathan
Consultee Full Name	Jonathan Carson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1012
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am extremely concerned about the hideous plans to erect multiple homes NE of Thatcham.</p> <p>The facilities and infrastructure in the local area are already at bursting point, and to the point where it's becoming a have to get public transport or need to find schools.</p> <p>The stunning local conservation areas are becoming destroyed with the number of people who are accessing them will destroy both them and the local wildlife that presides there.</p> <p>The traffic already flying through the conservation areas where horses, children, deer and others roam is so high, the it now takes to drive anywhere.</p> <p>I am totally against this, and it MUST NOT be allowed to go ahead!</p> <p>It will cause many more concerns and issues for both the local community and indeed the local council moving forward.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heslop, Claire
Consultee Full Name	Claire Heslop
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1597
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 22:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am objecting to the plan as I find it unsound. I think this is an extremely poorly thought out plan and it is clear that it is not in any real regard for the local area and the current community.</p> <p>I am concerned by the increase in traffic that will affect travel along the A4 and at busy times all junctions on to, and about the impact of traffic that will travel up Harts Hill and either out through Upper Bucklebury and Bradfield or along Cold Ash. Through Cold Ash there are no pavements past St Finian's (I am amazed no children have been involved with parked cars to the school) . There are huge issues at pick up and drop off time with cars queuing to get in and cars trying to overtake on a blind corner. There were many accidents and issues on Harts Hill in the icy weather imagine how much more with the increased weight of traffic, not to mention the danger for anyone pushing bikes up this EXTREMELY narrow road with no pavement.</p> <p>How will traffic get across the railway crossing when we can already queue back for many minutes often almost to the point where the traffic the queues will go back to, and block up, the A4.</p> <p>I am concerned that no Health Impact Statement has been carried out and the increased pressure this development will put on GP surgeries. You often cannot get an appointment when needed so what will happen when there are more people ailing? This development have a huge impact on our hospitals as there will then be an increased overflow into hospitals and the medical help they need in the right time frame.</p> <p>I am horrified by the impact on the local environment, we have already experienced large amounts of flooding in Thatcham. To effectively concrete over the whole of one side of the valley you will just increase the run off, and the speed of the water for Thatcham.</p> <p>The effect of the spill over into the local areas is a real worry living in Bucklebury Common. We already experience a lot of motorbikes, mountain bikers and 4x4s in the common. We meet lots of people dog walking and we ourselves keep horses. During lockdown when everyone was seeking space to walk for recreation we had lots more people walking through the common this seemed a positive thing but it soon became apparent there were cars being parked all over the common (covering up the ancient surface and damaging the roots of the trees), they did not make eye contact or say hello and many did not have horses i.e. letting dogs run up which would bark and spook the horses. We keep chickens in an allotment and they are often to have come across from the paths in the common. During Covid we would find people wandering through the allotment to walk anywhere. The more people that are pushed into Bucklebury Common, the more antisocial behaviour will happen with dogs chasing horses/ animals, motorbikes frightening horses, off roaders taking to any area of the common.</p> <p>SP17 is a seriously poorly thought out policy building on green, open agricultural land and ruining yet another area of significant impact on our local ancient and protected woodland and the wildlife that is found within. There must surely be a better way for these houses.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucklebury Parish Council (Represented by Andrew Black Consulting)
Consultee Full Name	Bucklebury Parish Council
Consultee Organisation	Bucklebury Parish Council
Agent Full Name	Andrew Black
Agent Organisation	Andrew Black Consulting
Comment ID	PS1339
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:11:00
Attached Files	Andrew Black Consulting (Bucklebury PC) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>1. Introduction and Executive Summary</p> <p>1.1 These representations are made on behalf of Bucklebury Parish Council (BPC) in response to the regulation 19 Council (WBC) Local Plan Review (LPR). The representations set out that there are multiple significant flaws in the review which are incapable of being remedied prior to the submission of the document for examination. The Local Plan evidence base, is fundamentally unsound for numerous reasons as set out within these detailed representations.</p> <p>1.2 These representations have been prepared with significant input from experts on a variety of technical matters. Technical by Yes Engineering in relation to highways and the Nature Bureau in relation to biodiversity and ecology and are approved by the Council.</p> <p>1.3 The representations have been informed by ongoing consultation with the residents of Bucklebury and the surrounding area, and the knowledge of the history and constraints of North East Thatcham. This has uncovered a substantial lack of logic in the plan to allocate the area to the North East of Thatcham for significant housing growth.</p> <p>1.4 At the time of these submissions, a consultation is taking place (until 2 March 2023) for proposed changes to the National Planning Policy Framework (NPPF). The potential impact of those changes in respect of the WBC Local Plan Review are discussed in subsequent paragraphs. However, the main thrust of these representations is made against the existing tests of soundness as set out in paragraph 35 of the framework. This states that plans are 'sound' if they are:</p> <p>Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs in co-operation with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so as part of sustainable development;</p> <p>Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>Effective—deliverable over the plan period, and based on effective joint working on cross- boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies of the NPPF, statements of national planning policy, where relevant</p> <p>1.5 For the reasons set out within these representations, it is considered that the plan is unsound and fails against each of the tests set out in paragraph 35 of the framework in numerous areas of the LPR. The failings against the tests of soundness are set out in detail in the following paragraphs of these representations.</p> <p>1.6 The LPR is not positively prepared and would not achieve the goal of sustainable development for WBC and the surrounding area.</p> <p>1.7 The LPR is not justified. Many of the grounds for assessment of impacts and benefits lack credibility and are not supported by evidence. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of the area to the North East of Thatcham is an appropriate strategy for WBC.</p> <p>1.8 The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable over the plan period.</p> <p>1.9 The LPR is not consistent with national policy. In many instances the allocation for development of North East Thatcham would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.</p> <p>1.10 The process of assessing the impact of development under policy SP17 through the sustainability appraisal is flawed and the impact which can be easily remedied through modifications to the plan.</p> <p>1.11 The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.</p>

Development in the Countryside and the 'Strategic Gap'

4.23 The strategic gap between Bucklebury and Thatcham is an extremely important one. Bucklebury is a rural parish and its rural character and identities will be lost. Thatcham is an urban town. Floral Way is the important boundary between them, and it should not be breached. The Bucklebury Vision states that *local residents highly value the rural nature of the area in which they live and wish to see this for future generations to enjoy.*

4.24 All policies point to the requirement that these settlements should be distinctly separate and maintain their own character. The need for separate settlements is made even more important if the remote nature of the AONB is to be protected in accordance with the policies.

4.25 Unfortunately, the development at North East Thatcham would destroy this important feeling of separateness, with the housing estate with the rural setting of Upper Bucklebury. Although there is a "country park" strip between them, this is ineffective in maintaining the gap between the settlements. As Upper Bucklebury is lost into Thatcham, so too is the rural setting.

Siege Cross

4.26 Siege Cross is a constituent part of the site allocation at North East Thatcham, making up one of the three proposals which are the subject of developers' plans in 2015/16, but planning permission for around 500 houses was refused and dismissed on appeal. A recovered appeal decision (APP/W0340/W/15/3141449). It is puzzling that a site for 500 houses should be heavily resisted when a site promoted for a significantly larger scheme.

4.27 It may assist to reiterate some of the arguments WBC itself used to oppose the Siege Cross proposal. The elements of the case, and multiple similar points successfully deployed by WBC in refusing the Siege Cross application.

4.28 WBC Planning Officers put forward the following in the 15/00296/OUTMAJ West Berkshire Council's Statement of Reasons in relation to Landscape and Visual Impact:

Landscape and Visual Impact

The development would result in significant and demonstrable harm in terms of landscape character; settlement form; and the historic environment. In particular:

(c) The proposed development would result in harm to the character and identity of Thatcham and erode the open landscape character of Upper Bucklebury.

(d) The development would have an adverse impact on the distinctive local landscape character and appearance of the AONB the boundary of which runs some 575 metres to the north of the site.

(e) The development would urbanise the key areas of sensitivity within the Local Landscape Character Area 14F (Countryside) including: the lower slopes of an important ridge line; Big Gully, a local landmark; good views across the area and the lack of development with scattered buildings.

(f) The development would detract from the enjoyment of the character and appearance of the AONB in views from the Kennet.

...the development fails to have due regard to the sensitivity of the area to change. The development is inappropriate in scale on the whole site, and its scale in the context of the existing settlement form, pattern and character of Thatcham. The development would erode the historic landscape setting and rural context of Siege Cross Farm.

The development is contrary to guidance in the relevant landscape character assessments, and therefore fails to protect the rural character and distinctiveness. The development would erode the identity of Thatcham as being separate to that of the surrounding countryside.

...the application is contrary to the National Planning Policy Framework, the Planning Practice Guidance, Policies AD1 and AD2 of the West Berkshire Core Strategy (2006- 2026), the relevant landscape character assessments, the North Wessex Downs AONB (2014- 2019), and the North Wessex Downs AONB Position Statement on Setting (2012).

...the Council will highlight that the appeal site is largely undeveloped land outside of the existing defined settlement boundary. The Council will give evidence on the weight that should be applied to individual policies, and will demonstrate the proposal is inconsistent with the National Planning Policy Framework, Policies ADPP1, ADPP3 and CS1 of the West Berkshire Core Strategy, Policies AD1 and AD2 of the West Berkshire District Local Plan 1991-2006 (Saved Policies 2007) and emerging Policy C1 of the Housing Site Allocation Plan at the location of new development.

4.29 It is notable that WBC were particularly concerned about the effect of the Siege Cross development on the wider rural setting with National and local policies and on the AONB. However, in the SP17 proposed development, WBC proposes a site which erroneously implies that there will be no harm to it or to the wider countryside.

4.30 The Officer Report also set out commentary in relation to the impact on the North Wessex Down AONB as follows:

S.5...I set out the North Wessex Downs AONB's objections to the proposed development, which I support.

S.7...the attributes of the site and its immediate setting are recognised as key features which should be conserved and enhanced to protect the local character and distinctiveness of the landscape and the rural setting to Thatcham and the North Wessex Downs AONB.

S.10...The site makes an important contribution to the setting of the AONB and to the setting of both ecological and historic interest (Big Copse, Big Gully and Siege Cross Farm).

S.11 ... it is a 'valued' landscape within the meaning of NPPF 109 which should be protected and enhanced... which provides significant benefits. The proposed development would result in significant and demonstrable harm to a valued landscape and to the rural setting of this landscape ...the proposed development is not environmentally sustainable contrary to NPPF para 7.

S.12 ...The proposed development on the appeal site would therefore be an extensive arm into this open elevated rural landscape and is not a logical extension to Thatcham as it will intrude into an overwhelmingly rural landscape, which forms an intrinsic part of the AONB and Thatcham, well beyond a clearly defined and established landscape boundary to the settlement.

S.14...The value of the landscape is enhanced by the presence of historic assets in this case two Grade II listed buildings, Siege Cross Farm ...

S.17... adverse effect of the development on the physical and visual setting and character of the site environment... consequences of the location, extent and mass and scale of the development, nor the impact on many views...consequence, the development would result in long term major and moderate-major adverse landscape and visual effects and several additional moderate adverse effects. It is concluded that the proposed development on the appeal site would result in significant and demonstrable harm to a valued landscape and character of that landscape by:

- Harming the character, value and visual appearance of the site as part of the open countryside;*

- *Harming the landscape and visual setting of the historic Siege Cross Farm and its Grade II listed buildings;*
- *Harming the setting of the North Wessex Downs Area of Outstanding Natural Beauty..”*

S.19 *In conclusion, the Inspector and Secretary of State are respectfully requested to dismiss the appeal on unaccepted grounds.”*

4.31 It is abundantly clear that WBC’s own expert was categorical in the assessment of the damage that Siege Cross would cause. This expert opinion was repeated throughout WBC’s vigorous opposition to the site.

4.32 BPC emphasise that the Siege Cross site now forms part of the THA20 proposal. However, this current proposal is much closer to the AONB. The potential damage caused would be significantly greater.

4.33 WBC have provided no new information or analysis to overturn their earlier conclusion. If that process was sought, it is clear that the current conclusion cannot be.

Thatcham Growth Study

4.34 The three stages of the Thatcham Growth Study (TGS) are included within the evidence base for the LPR and it is the context of the LPR.

4.35 BPC understand that the promoters of the NE Thatcham site paid WBC the sum of £100,000 which was spent on a HEELA study which recommended the allocation of the site. The report contains material inaccuracies such as disqualification to properly consider the benefits; a bridge over the railway at Thatcham to replace a dangerous and crowded level crossing were alerted to this by BPC and others but declined to correct the report even though on any rational scoring scheme the result would be different.

4.36 WBC then proceeded in subsequent stages of the TGS to make NE Thatcham a condition of the work. This is a process where that evidence is collected that supports the HEELA rather than continuing to consider all options. The primary example of this is in this the consultant (ceni) were instructed in the statement of requirements to provide a vision assuming THA20 was not here. Firstly, the vision work should have preceded the site selection and secondly, the vision fails to be more than a condition made.

4.37 Overall, the serious flaws in the site selection process have led to erroneous selection of North East Thatcham. As a result, the plan is not justified and wholly unsound on this basis alone. This is not a matter which can be remedied through the evidence base in advance of examination.

4.38 BPC will continue to amass evidence on the scope, methodology and funding of the TGS to present this to the Inspector in the context of the LPR.

5. Sustainability Appraisal

5.1 BPC has serious concerns over the approach taken to the Sustainability Appraisal which accompanies the LPR. The assessment of impacts and benefits of the allocation of North East Thatcham against the sustainability objectives are seriously flawed in their rationality. As a result, the true impacts of the allocation of North East Thatcham under policy SP17 have been underestimated in the evidence base.

5.2 Paragraph 32 of the framework requires that Local Plans and Spatial Development Strategies should be informed by a Sustainability Appraisal (SA) that meets the relevant legal requirements.

5.3 The legal frameworks for SAs are set out within section 19 of the Planning and Compulsory Purchase Act 2004 which requires to prepare a plan *with the objective of contributing to the achievement of sustainable development*. Moreover, the requirements of the Assessment of Plans and Programmes Regulations 2004 states that SAs must ensure the potential environmental effects alongside social and economic issues.

5.4 For the reasons set out within this section, and other sections in these representations, it is not considered that the conclusions to all effects nor are the conclusions of the SA in respect of those impacts robust and logical.

5.5 Paragraph 32 of the framework goes on to state that the SA should *demonstrate how the plan has addressed relevant environmental objectives (including opportunities for net gains)*. *Significant adverse impacts on these objectives should be avoided where possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts cannot be avoided, mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)*.

Sustainability Appraisal for SP17 – North East Thatcham Strategic Site

5.6 The SA sets out the assessment of the council of the development of North East Thatcham against the key SA Objectives.

5.7 In **all instances**, BPC consider that the approach taken to the assessment and scoring of the site against the SA Objectives is flawed. BPC has prepared its own analysis against the SA Objectives, and this is included with the reps at appendix 2 [see *Black Consulting (Bucklebury Parish Council)*’].

5.8 Many, if not most of the conclusions are not based on any accurate or available evidence and an accurate or realistic assessment of the site performing poorly against all SA objectives. Commentary on the assessment in relation to individual policies and implications in sections of these representations. Given that site selection should be an iterative process that is informed by the SA Objectives, the allocation to allocate SP17 is severely inadequate and must be wholly disregarded.

5.9 This is a matter of legal compliance which goes to the heart of the preparation of the plan. It is not an error which can be corrected by amendments or further update to the SA.

Reasonable Alternatives

5.10 The Planning Practice Guidance sets out the way in which the SA can assess reasonable alternatives and identify the preferred alternative as follows:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the impacts of each alternative against the baseline environmental, economic and social characteristics of the area and the likely situation if the preferred alternative is adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on the environment and social factors using the evidence base (employing the same level of detail for each alternative option). Critical issues where the significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, where possible, compensate for them.*

- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selection of the*

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently diverse to show sustainability implications of each so that meaningful comparisons can be made.

The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised in light of findings.

Paragraph: 018 Reference ID: 11-018-20140306

Revision date: 06 03 2014

5.11 Table 30 of the Sustainability Appraisal sets out the following in relation to Quantum of Development at North East Thatcham

[See page 21 of the attachment 'Andrew Black Consulting (Bucklebury Parish Council)'].

5.12 The conclusion against the quantum of 2,500 homes on site that it would likely to result in a **positive impact on sustainability** is wholly irrational and illogical. This is further compounded by the suggestion that a quantum of 1,500 homes would result in **elements of sustainability** which again is simply not the case.

5.13 No option for no development at NE Thatcham or a further lower amount. 1,500 dwellings is still a considerable amount for 250-500 dwellings along the southern end of the site in small areas of development adjacent to the Bath Road

5.14 BPC has undertaken a justified and accurate assessment of the impacts of the allocation of North East Thatcham. The assessment demonstrates that the approach taken by WPC lacks justification and is not positively prepared in any way whatsoever. The inspector at examination process to demonstrate that lack of rationality in approach taken by WPC in preparation of the plan.

6. North East Thatcham Strategic Allocation

6.1 The full policy wording of policy SP17 is set out below with some comments made against each section.

North East Thatcham Strategic Site Allocation

Land as shown on the Policies Map is allocated for a sustainable low carbon, urban extension comprising of development by their landscape and connected and contributing to Thatcham, and woven through with natural habitats and green infrastructure masterplanned and delivered as a whole to achieve a comprehensive development.

6.2 It is illogical that Masterplanning is yet to take place for the site and that there is no vision for how the homes will be delivered, especially as the site is sloping and its access is compromised by the pipeline.

The provision of all infrastructure, services, open space and facilities will be timely and co-ordinated. The Thatcham Plan provides guiding principles for the delivery of the site therefore proposals will demonstrate that these guiding principles have been responded to.

6.3 There is no detail on the infrastructure or other facilities. It is also clear from the viability work undertaken that the site is not deliverable adequately and there is no available evidence that the site is deliverable.

Homes

The site is to be allocated for approximately 1,500 dwellings which will be completed within the period of the plan. The dwellings will comprise of a housing mix which complies with the housing mix contained in Table 3 of Policy SP18. In addition:

40% of dwellings will be affordable housing; and

3% of dwellings will be delivered via serviced custom/self-build plots. Community

The site will provide:

Local centres providing local retail facilities and small-scale employment for community use (approximately 100 sq metres F2);

450 sq metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care System or appropriate body;

6.4 Further consideration on the viability and deliverability of the GP Surgery is set out within subsequent sections of the plan.

Early years provision;

A 2.5 FE primary school on site and sports infrastructure requirements of the school, land to be provided and delivered by the applicant;

Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation measures to be studied, undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders;

6.5 It is noted that the school provision has not been costed within the viability appraisal and therefore the deliverability of the school is unjustified.

1,200 sq m community indoor facility to be used for sport and community uses with a variety of room sizes (including a multi-use hall);

6.6 This is a substantial size for a community indoor facility and no details or costings are provided for this within the plan.

Outdoor formal and informal sports pitches and areas to meet the identified need of the development; Open spaces to be provided in accordance with Policy DM41;

6.7 Given that most of the site is on a gradient it is unclear how formal or informal sports provision will be brought forward.

Green Infrastructure

The site will provide a comprehensive green infrastructure network which will take advantage of the landscape and green infrastructure around the site. This network will comprise:

A new community park linking Thatcham to the North Wessex Downs AONB;

Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes;

6.8 It is unclear why links to the AONB are being encouraged as part of the proposed allocation. Given the sensitivity of the AONB then impact through an increase in access should not be encouraged. This is expanded on within further sections of the plan.

A comprehensive network of other accessible routes and connections within the development which provide direct routes to the AONB;

6.9 Given the gradient and level change across the site, it is not considered that a comprehensive network of cycle paths can be delivered.

Existing and new Public Rights of Way; and

Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain.

Transport

Measures will be included to improve accessibility by, and encourage use of, non-motorised transport modes. The report will provide detail on how this will be achieved, including:

Active travel improvements on routes between the site, Thatcham town centre and the railway station;

A vehicular through route; Sustainable transport through routes;

Mitigation of the development's impacts on the highways network with improvements to existing junctions and the delivery of new access points for all forms of movement and transport to the site at locations to be agreed with the highway authority.

How adverse impacts on air quality will be minimised.

6.10 Detailed comments on highway impact are set out in subsequent sections of these representations. BPC has significant concerns that the base for trip rates and trip distribution is highly flawed and mitigation measures will not be successful. The highway network at Thatcham is already over capacity and development of this scale will lead to severe traffic impact which would breach the requirements of 111 of the NPPF.

Sustainability

Development of the site will be supported by a Sustainability Charter which will establish how policy requirements will be informed by:

An Energy Strategy which sets out measures to achieve a model low carbon development (following the energy efficiency measures in Policies SP5 and DM4, including:

net zero carbon (regulated and unregulated energy) emissions for dwellings;

6.11 It is highly unlikely that the dwellings will be brought forward as net zero carbon and no allowance has been made for this in the Sustainability Appraisal for the site.

BREEAM 'excellent' non-residential buildings;

on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and carbon offsetting.

An Integrated Water Supply and Drainage Strategy which will set out:

measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water treatment; and surface water management approaches that could deliver net gain for Thatcham town, including use of on-site water storage (SuDS).

6.12 It is unclear how any development on this site would deliver a 'net gain' for Thatcham Town in terms of drainage infrastructure within the viability report for the site.

An Ecology Strategy which will set out:

a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat restoration and creation; how priority habitats and ecological features will be protected and enhanced; the creation of new ecological features; and a site-wide management plan.

6.13 Further comments are made on the ecology of the site within these representations.

A Green Infrastructure Strategy which will show how a network of multifunctional green infrastructure will be delivered.

A Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced, and how new ones will be established, including bridleway links and safe crossing points.

A Lighting Strategy which will include consideration of dark skies, particularly in relation to the nearby North Downs Way, and measures to mitigate the impact on biodiversity.

6.14 It is clear from the wording of this section of the allocation policy that WBC accept that the site is within the setting of the North Downs Way and that this will be an element of harm (in respect of lighting) which requires mitigation. This position conflicts the position in the Sustainability Appraisal where the impact as being neutral in this respect.

6.15 It is considered that the harm to the AONB extends to a far greater impact than just lighting and is a severe failure of the Sustainability Appraisal.

A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and the provision of public open space. The LVIA will be informed by the Landscape Sensitivity Assessment.

6.16 Given the highly sensitive location of the site it is illogical that an LVIA has not already been carried out for the site.

A Mineral Resource Assessment (MRA).

A Historic Environment Strategy to demonstrate how the listed buildings in the area will be conserved and how their settings have been considered.

6.17 Consideration of heritage impact should have been undertaken as part of the site selection process and subsequently. It is not considered appropriate that this is left to later stages of the planning application process.

A Construction and Operations Management Plan (COMP) shall accompany any planning application on the site, including the oil pipeline from operational works, including the provision of an appropriate buffer.

6.18 The Oil Pipeline is shown in figure 39 of the Thatcham Growth Study and runs along the entirety of the southern boundary of the site to a 6m easement either side. Assuming that this also includes a restriction on building roads then this could lead to the need for the implementation of any development on the site.

[See page 26 of the attachment 'Andrew Black Consulting (Bucklebury Parish Council)' for Figure 39 of the Thatcham Growth Study]

6.19 Paragraph 2.44 of the Growth Study states:

*The low gradient land at the southern edge of the site is also compromised by the presence of an oil pipeline (detailed in the NPPF). **no development is possible for access reasons.***

6.20 Given the significant ambiguity over the position of the impact of the oil pipeline it is considered unclear on whether the site is **deliverable** and **developable** as set out in the glossary of the NPPF. Given that WBC are acutely aware of these constraints, no further work has not been undertaken. Further information will be presented by BPC at the examination on this matter.

[See page 27 of the attachment 'Andrew Black Consulting (Bucklebury Parish Council)' for Figure 39 of the Thatcham North-East Strategic Development Plan.]

7. Landscape and Character Impact

7.1 BPC has identified three key areas of environmental objection to the proposed Thatcham North-East strategic development. The main points of objection were summarised in the Bucklebury public meeting on December 2nd as follows:

- Damage to the Common
- Greenfield development in an AONB
- Poor excuse of a 'country park'

7.2 There is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, the development will have a significantly negative impact.

7.3 The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of landscapes. Policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally important landscapes in the wider countryside.

7.4 Paragraph 2.1 of the Context Section of the LPRPS sets out that 74% of West Berkshire is within the AONB and is a significant part of the overall make-up of the district.

7.5 Policy SP2 of the LPRPS sets out the approach to development in connections with the North Wessex Downs AONB. It includes specific reference to the Management Plan for the North Wessex Downs.

7.6 During the regulation 18 consultation, a significant number of objections were raised based on the development's impact on the AONB. WBC responded to these objections by stating:

'In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development should be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the context within which any proposed development would need to conform. The LCA notes that whilst there is no statutory AONB on the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be used as the council's evidence base to inform the proposed allocation.'

The updated version of the proposed allocation policy in the next published version of the LPR will set out that a Landscape Sensitivity and Capacity Assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development and the site.

With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' with accompanying explanatory text, to

provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.'

7.7 The Policy lacks focus for development within the setting of the AONB. Given the wide area of land (74%) that is covered by the AONB there will consequently be a large amount of land that will be within its setting.

7.8 The North Wessex Downs AONB statement on development in the setting of the AONB states that 'examples of impacts on the North Wessex Downs AONB include:

- development which would have a significant visual impact on views in or out of the AONB
- breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and tall buildings (or blades for example)
- loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impacts
- loss of spatial associations and historic relationships
- introduction of abrupt change of landscape character
- loss of biodiversity, particularly of habitats or species of importance to the AONB
- loss of features of historic and natural landscape interest, particularly if these are contiguous with the AONB;
- change of use of land such that to cause harm to landscape character
- development individually or cumulatively giving rise to significantly increased traffic flows to and from the AONB and erosion of the character of rural roads and lanes
- Increase in air and water pollution

7.9 It is considered that the development of North East Thatcham would give rise to all of these adverse impacts to some extent.

7.10 The Planning Practice Guidance sets out the following in relation to landscape with special characteristics:

Where landscapes have a particular local value, it is important for policies to identify their special characteristics and to provide evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design and landscaping where necessary. The cumulative impacts of development on the landscape need to be considered carefully.

Paragraph: 036 Reference ID: 8-036-20190721

Revision date: 21 07 2019

7.11 The Planning Practice Guidance goes on to set out how the character of such landscapes can be assessed.

For a designated landscape, the relevant management plan will contain further information on the area's particular characteristics.

Where appropriate, landscape character assessments can be prepared to complement Natural England's National Landscape Character Assessment. Natural England provides guidance on undertaking these assessments.

To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed.

To demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment can be completed.

Paragraph: 037 Reference ID: 8-037-20190721

Revision date: 21 07 2019

7.12 The PPG goes on to states:

All planning policies and decisions need to be based on **up-to date information** about the natural environment and including drawing, for example, from River Basin Management Plans, Areas of Outstanding Natural Beauty Management Plans (including environmental net gain and Nature Recovery Networks), Tree and Woodland Strategies, and Landscape Working with Local Nature Partnerships and other public bodies where appropriate, this should include an assessment of components of ecological networks, biodiversity resources and landscapes.

7.13 The Supporting Text of policy SP8 (Landscape Character) sets out the following in paragraph 5.41:

Other relevant landscape character assessments include the North Wessex Downs AONB Landscape Character Assessment produced in order to manage and guide change across a designated area extending beyond West Berkshire. In addition, the Landscape Characterisation (2007) and Historic Environment Character Zoning (2007) [footnote 30], which provide a sound understanding of the context of West Berkshire, can also be used by the Council to inform and support planning decisions.

7.14 It is not considered that the Landscape Character Assessment that is now more than 20 years old can be considered consistent with the guidance.

7.15 The Planning Practice Guidance goes on to state:

A Sustainability Appraisal which meets the relevant legal requirements on strategic environmental assessment should inform the preparation of spatial development strategies and local plans, and should consider all the likely significant effects on the environment, including social factors, and inform the strategy being progressed. Where relevant, strategic policy-making authorities will need to consider the effects generated by existing businesses when allocating sites, in accordance with the "agent of change" policy set out in the National Planning Policy Framework.

Plans may require a variety of other environmental assessments, such as under the Habitats Regulations where the development is a Habitats Site (which may not necessarily be within the same local authority area and may include in combination effects from other sites).

Paragraph: 043 Reference ID: 61-043-20190315

Revision date: 15 03 2019

7.16 The Thatcham Strategic Growth Study (TSGS) offers little assessment of the damage THA20 would cause to the AONB that the AONB partnership has objected to it, and that there is "little intervisibility between the two if an appropriate buffer is provided. This does not adequately assess the effect the development would have on the AONB. The document goes on to say "the Downs is less strong" and then promotes links as a benefit for the town, with absolutely no consideration of the impact on the AONB.

7.17 WBC is well aware of the negative impact on the AONB. The Site Selection Background Paper December 2020 (later CA sites) states:

It is the Council's preferred approach to allocate site THA20 as a strategic site. Due to the scale of development that would be considered that there should be no further allocations in Thatcham in the period to 2037 particularly as development in Thatcham would result in the loss of the separate identities of Cold Ash and Bucklebury, and would harm the setting of the AONB.

7.18 This clearly states that by developing THA20 WBC is accepting that the separate identity of Bucklebury would be harmed and cause harm to the AONB setting.

7.19 In short, all evidence points to the inappropriate nature of this proposal. It would have a direct and irretrievable impact on the AONB. WBC are charged to protect the AONB, and should reconsider the positioning of THA20 as a viable site.

Proposed Country Park

7.20 The LPR makes provision for a country park which is indicated as three areas on the plan accompanying the LPR.

7.21 The Reg 18 version of the LPR contained only 2 areas for the country park, the third was added for landscape reasons for rural separation on Harts Hill.

7.22 The AONB board objects to the concept of a country park in close proximity to the AONB as it will encourage visitors and potential to cause further harm to the wider areas.

7.23 The 'country park' has not been designed to support biodiversity net gain – not only are the areas indicated short of the broader habitat network) but also there is no evidence to suggest the levels of biodiversity net gain they might achieve on the scale of development it is there to buffer.

7.24 A carpark has been provided to attract users to the country park, but this is counter intuitive to the need to protect the AONB.

7.25 The Sustainability Appraisal sets out the allocation for development at North East Thatcham under policy SP17 which is against the objective to *conserve and enhance the character of the landscape*. The WBC justification for this assessment is *to have a positive impact on landscape character as consideration of the landscape is written into the policy*. This is not a valid justification.

Conclusion in respect of Landscape and Character Impact

7.26 It is not considered that plan is positively prepared, justified or effective in regard to landscape and the AONB and is therefore, regardless of the conclusions against other elements of the LPR.

8. Ecology and Biodiversity Impact

8.1 It is considered that there are some significant issues with soundness on the approach taken to ecology and biodiversity and allocation of the land at North East Thatcham.

8.2 BPC commissioned reports from the Nature Bureau in relation to biodiversity and the country park and these are attached to the LPR.

8.3 Paragraph 174 of the NPPF sets out the following in relation to biodiversity and ecology.

Planning policies and decisions should contribute to and enhance the natural and local environment by (inter alia) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner consistent with the statutory status or identified quality in the development plan);

8.4 The site is in the setting of the AONB and as such the development of the land would not protect nor enhance this setting. **the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;**

8.5 The development of this site would have a significant impact on the character and beauty of Thatcham and Bucklebury. **c) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks and resilient to current and future pressures;**

8.6 There is no evidence that the impact of the development on biodiversity or the provision of net gains for biodiversity. Instead, this is being left to the application stage. This is considered too late and runs contrary to the approach set out in the Framework.

d) preventing new and existing development from contributing to, being put at unacceptable risk from, or being put at unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, improve environmental conditions such as air and water quality, taking into account relevant information such as river quality.

8.7 Again, there is no evidence that the impact on these matters has been taken into account by WBC in the selection of sites.

8.8 Paragraph 174 of the Framework goes on to state:

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land to sites of amenity value, where consistent with other policies in this Framework [footnote 58]; take a strategic approach to managing habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale.

8.9 As set out, there is a distinct lack of evidence base documents in relation to such sites. Where such an evidence base is provided, it is to be significantly out of date.

8.10 Paragraph 179 of the Framework goes on to state:

To protect and enhance biodiversity and geodiversity, plans should:

a) identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the national and locally designated sites of importance for biodiversity [footnote 61]; wildlife corridors and stepping stones that connect national and local partnerships for habitat management, enhancement, restoration or creation [footnote 62]; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection of them, and identify and pursue opportunities for securing measurable net gains for

8.11 The Planning Practice Guidance sets out the following:

Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed conservation as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the commitments made by government in its 25 Year Environment Plan.

Guidance on the law concerning designated sites and protected species is published separately because its application in applying this, the aim should be to fulfil statutory obligations in a way that minimises delays and burdens.

Paragraph: 009 Reference ID: 8-009-20190721

Revision date: 21 07 2019

8.12 The council has not embedded biodiversity as part of the plan and have instead chosen to leave this to the application stage.

8.13 The PPG goes on to set out how planning authorities can plan for biodiversity and geodiversity as follows:

Development plans and planning decisions have the potential to affect biodiversity or geodiversity outside as well as within the boundaries of the plan area.

Planning authorities and neighbourhood planning bodies can work collaboratively with other partners, including Local Nature Partnerships, to deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence, and consider the opportunities that individual development proposals may provide to conserve and enhance biodiversity and geodiversity, including habitat connectivity in the wider area (including as part of the Nature Recovery Network).

In this context, it is useful to consider:

- the latest government policies that are relevant, including the commitments in the 25 Year Environment Plan;*
- the contents of existing up-to-date plans and strategies for biodiversity and nature recovery;*
- the potential effects of a development on the habitats or species on the Natural Environment and Rural Communities Act 2006;*
- whether an ecological survey is appropriate;*
- opportunities to restore or enhance local ecological networks, including those that contribute to the wider Nature Recovery Network;*
- how to secure net gains for biodiversity as part of green infrastructure provision; and*
- opportunities to work strategically in order to streamline development decisions: for example, by establishing a 'zero net loss' approach.*

Paragraph: 010 Reference ID: 8-010-20190721

Revision date: 21 07 2019

8.14 There is no evidence that WBC has taken into account any of these factors in the preparation of the plan.

8.15 The PPG sets out the evidence which needs to be taken into account in identifying and mapping local ecological networks:

Relevant evidence in identifying and mapping local ecological networks can include:

- the broad geological, geomorphological and bio-geographical character of the area, creating its main landscape character;*
- key natural systems and processes within the area, including fluvial and coastal;*
- the location and extent of internationally, nationally and locally designated sites;*
- the distribution of protected and priority habitats and species;*
- areas of irreplaceable natural habitat;*
- habitats where specific land management practices are required for their conservation;*
- main landscape features which, due to their linear or continuous nature, support migration, dispersal and gene flow, and therefore improve species resilience;*
- areas identified by national or local partnerships with potential for habitat enhancement or restoration, including those that adapt to climate change or which could assist with the habitat shifts and species migrations arising from climate change;*
- audits of green infrastructure, such as open space within urban areas;*
- information on the biodiversity and geodiversity value of previously developed land and the opportunities for improvement;*
- areas of geological value which would benefit from enhancement and management.*

Local Nature Partnerships and similar partnerships working to conserve wildlife can be a useful source of information.

Paragraph: 011 Reference ID: 8-011-20190721

Revision date: 21 07 2019

8.16 There is no evidence that WBC has taken into account any of these factors in the preparation of the plan.

8.17 The LPR states (p46):

8.18 Where a proposal is likely to result in harm to sites of local importance (including habitats or species of principal importance), sites that meet the criteria for designation as a Local Wildlife Site or designation as a Local Geological Site), development should follow the following sequential approach:

Firstly, seek an alternative site in the District with a lesser impact than that proposed

Secondly, if the first is not possible, demonstrate mitigation measures can be taken on site

Thirdly, and as a last resort, seek appropriate compensation measures, on site wherever possible and off site where necessary, to ensure long term management and maintenance.

Damage to Bucklebury Common

8.19 Bucklebury Common is one of the largest Commons in Southern England, containing the largest heathland in the region. It includes the historic Avenue of Oaks at Chapel Row, notable ancient woodlands, and other important habitats. It is part of the Bucklebury Plateau Biodiversity Opportunity area, and as such is considered to include 'important and rare' habitats, one of the country's most important adder communities, and numerous protected animals and plants.

8.20 Management of the Common is entering a new phase and has presented its vision for the enrichment and on-going management of this rare and precious environment. The management team for the Common includes Natural England, BBOWT, NWD AONB, along with members of the local community and ecological consultants.

8.21 At a presentation of the vision to the broader community, it was acknowledged that the Common is an open area and requires very careful management to protect it.

8.22 It is a key part of the Bucklebury vision for the Common to not increase the number of visitors, but to place the emphasis on providing a chance to restore itself and thrive, both in terms of the diversity and abundance of its fragile ecosystem.

8.23 Based on the housing mix described in the LPR, the proposed development represents an additional 4000+ people being added into the AONB, which includes the irreplaceable habitats found in Bucklebury Common, with its ancient woodlands and historic ponds.

8.24 The Common is already struggling to balance accessibility and leisure usage with the needs of the environment, and dog walkers particularly impacting ground-nesting birds, notably woodcock, and other wildlife.

Damage to Ecology

8.25 The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is part of the Biodiversity Opportunity Area.

8.26 The data being used to establish the presence of species is out of date. In 2020, Bucklebury Parish sought environmental data impacted by SP17:

- 80% of surveys were conducted more than 15 years ago
- 50% were more than 20 years old
- 44% were over 30 years old

8.27 BPC has appointed ecologists to conduct an independent study of the impacted area. The findings from a single study indicated that the site had a much higher biodiversity value than previously appreciated, including the presence of several bird species and one threatened migratory species, several bat species and abundant badger setts. The hedges, old trees and corridors linking up different habitats within and beyond the site boundaries. These initial findings imply that a full study of the area and measures and BNG will be far more complex for the development than was anticipated by the planners.

8.28 This one study has provided more information about the site than has been presented in the whole the LPR and the area has a much higher biodiversity value than assessed by WBC.

8.29 Protected species are present across the site and will be impacted. No detail on mitigation measures has been provided. Network features are under threat from the development and will severely impact distribution of key species.

8.30 The Sustainability Appraisal states that the allocation of development at North East Thatcham will have a significant impact on policy SP17. The WBC justification states that *the policy is likely to have a significantly positive impact on biodiversity and the environment for the development.*

Conclusions in respect of Ecology and Biodiversity Impact

8.31 Based on the representations made in relation to this matter it is not considered that the plan is justified, effective and is unsound on this basis alone.

9. Highway Impact

9.1 YES Engineering Group Limited was appointed by Bucklebury Parish Council to review the transport related evidence for the Berkshire Council emerging Local Plan specially with regards to the proposed allocation of NE Thatcham. The full report is available for these representations. References are set out within the report to THA20 rather than SP17 as this is how the site is shown on the evidence base.

9.2 The WBC Phase 1 Transport Assessment report identified some junctions and links that would be affected by the development. These were particularly focussed near to the proposed strategic North East Thatcham site, indicating delays and congestion at junctions along the A4 corridor, with through traffic diverting onto unsuitable routes.

9.3 Concept junction improvements are set out in Appendix A of the WBC Phase 2 report which essentially provides for the A4 corridor purely to facilitate the increase in traffic associated with development of North East Thatcham. However, this may be contrary to WBC Policy CS 13 which seeks to mitigate the impact on the local transport network and the strategic road network.

9.4 Journey time analysis during the AM and PM peak hours was undertaken over a 2-week period from 13th to 24th. The most desirable routes for those travelling east (towards Reading) or west towards M4 Chieveley. As shown within Appendix B it is demonstrated that the quickest route in each direction is via Harts Hill Road or via Cold Ash Lane rather than the strategic routes. This situation on these routes has not been assessed and this is a fundamental flaw within the modelling assessment.

9.5 Whilst the WBC Phase 2 report confirms other mitigation measures will be required to reduce car dependency for the development they cannot reduce the congestion (which already exists) to such levels that the most desirable route will no longer be via Harts Hill Road or Cold Ash Lane. This situation already occurs, and the WBC Phase 1 report has confirmed that these routes are the most desirable.

selection of North East Thatcham for significant development is fundamentally wrong as traffic will need to divert off the site based mitigation measures are almost impossible to achieve due its location/topography.

9.6 The A4 itself will create severance of the site from Thatcham rail station for pedestrian/cycle activity as it will be a strategic road, whilst any formal crossing points will cause further delay on the road network.

9.7 Congestion has been raised by WBC as a Key Issue and is consistently cited in the Council's annual residents' survey as an issue improving in the local area. The district has a high level of car ownership and usage that is in excess of the South East population growth, housing, and employment in the last few decades, as well as the proximity to other larger urban areas and demand for travel and a reliance on journeys made by the private car. The development at NE Thatcham is located with limited access to public transport. As such it is expected that the development would only add to the already congested Local Transport Goals to minimise congestion on the transport networks.

9.8 The WBSTM report confirms "Traffic flows increase (compared to the Reference Case) on major roads such as the A4, the A303, the A30, Road/Crookham Hill and the Broad Lane, as a result of increased traffic demand generated by the preferred Local Plan. This is due to re-assignment of traffic in all Local Plan scenarios (compared to the Reference Case) due to naturally increased demand in the centre in particular, though local roads in general seem to demonstrate low levels of highway demand increases across the district. Increases in Local Plan traffic demand though the corridor, as well as THA20 site traffic directly accessing the A4 in particular, displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury". As set out in Section 9.12, these routes are unsuitable (no footways, no lighting, high speed, tight bends) for an increase in traffic flows and would create high impacts for residents.

9.9 The trip rate criteria is considered unreliable, whilst the a trip rate reduction of 25% due to mitigation measures is considered unrealistic.

9.10 NPPF paragraph 111 states that 'development should only be prevented or refused on highways grounds if there are grounds on highway safety, or the residual cumulative impacts on the road network would be severe.'

9.11 As demonstrated within the appended report, the impacts are served and as acknowledged in the WBSTM report, the development at North East Thatcham is likely to cause displacement onto wider routes away from the A4, through local villages such as Upper Bucklebury. Phase 1 Transport Assessment describes these routes as **undesirable** and critically the impact has not been assessed. The assessment presented in support of the emerging local plan. Additionally, there are fundamental flaws within the trip assessment and the assumptions presented.

9.12 In summary in relation to transport it can be concluded that:

- **The trips rates set out by WBC are unreliable and not**
- **The trip distribution is unrealistic (all evidence suggest traffic will be diverted from the A4).**
- **The proposed mitigation measures suggested by WBC are improbable at**
- **The location of site means car traffic will dominate the**
- **The Highway network in the vicinity of THA20 is already over**
- **No assessment has been made of the routes most likely to be affected by an increase in**
- **Increase in traffic through Bucklebury will pose highway safety**

10. Heritage Impact

10.1 The allocation at North East Thatcham surrounds the Grade II listed Colthrop Manor.

10.2 The Planning Practice Guidance sets out the following in relation to local plans and historic environment:

Planning policies need to be based on up-to-date evidence about the historic environment in their area. Strategic policies should set out how they will use this evidence to assess the significance of heritage assets and the contribution they make to their environment and to the wider community, and to identify and protect unidentifiable heritage assets being discovered in the future. Authorities may draw on a wide range of evidence sources including the historic environment record, the National Heritage List for England, conservation area management plans and appraisals, and other local planning documents to identify assets of local historic importance.

Where a landscape character assessment is being prepared, strategic policy making authorities may wish to integrate landscape character and, for areas where there are major expansion options assessments of landscape sensitivity.

Good practice advice on the Historic Environment in local plans can be found on Historic England's website.

Paragraph: 045 Reference ID: 61-045-20190315

Revision date: 15 03 2019

10.3 There is no evidence that the WBC has taken into account the setting or significance of Colthrop Manor as a result of the allocation of North East Thatcham nor has WBC considered the impact of the development or the way in which the car will be used by it.

10.4 The wording of policy SP17 requires the submission of a *Historic Environment Strategy to demonstrate how the historic environment is conserved and how the impact of the development on their settings has been considered.*

10.5 This should have been undertaken as part of the site selection process.

10.6 The Sustainability Appraisal states that the allocation of North East Thatcham under policy SP17 would have a negative impact on the historic environment *to protect or conserve and enhance the built and historic environment to include sustaining the significant interest of historic buildings and places that this assessment is justified in any way whatsoever and the policy lacks credibility as a result.*

10.7 The LPR is not considered to be justified or consistent with national policy in respect of heritage impact and is therefore not considered to be a sound basis for the development.

11. Infrastructure and Services

11.1 BPC submits that there are significant failings with the LPR on whether the provision of infrastructure associated with the development at North East Thatcham under policy SP17 is viable or deliverable. It is not considered that the LPR has been positively prepared and the wording of the policy be effective in delivering the infrastructure required for the scope of development suggested for the site within the wording of policy SP17.

11.2 The Planning Practice Guidance sets out the following on the evidence that is needed to plan for health and well-being:

Strategic policy-making authorities can work with public health leads and health organisations to understand and take account of the projected health status and needs of the local population, including the quality and quantity of, and accessibility to, health services. Health and well-being growth may have on this. Authorities will also need to assess the quality and quantity of, and accessibility to, green infrastructure, recreation and places of worship including expected future changes, and any information about relevant barriers to health and well-being outcomes. Strategic policy-making authorities may consult any relevant Health Impact Assessments and consider the potential health impact and risks of development proposals.

Healthcare Facilities

11.3 The North-East Thattham development plan (SP17) proposes a 450 sq m primary healthcare facility with the site to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body in the absence of detail or insight into strategic healthcare planning.

11.4 Proposals for a major development that is likely to have a significant health impact in relation to its size and location should undergo a fit for purpose Health Impact Assessment (HIA) in accordance with the current guidance from Public Health England. The way to how the proposals for development have been discussed with health service providers regarding impacts on primary care development proposals should demonstrate how the conclusions of the HIA have been considered in the design of the development. It is of concern that neither V&P nor the local authority appear to have arranged or published a prospective HIA specific to the proposed development. It is of concern that neither V&P nor the local authority and private stakeholders respectively, appear to have arranged or published a prospective HIA specific to the proposed development.

11.5 Tackling health and wellbeing requires a multi-agency approach. The Berkshire West Health and Wellbeing Strategy has been developed by the Reading, West Berkshire and Wokingham Health and Wellbeing Boards together with the Berkshire Partnership. Developers are encouraged to engage with the healthcare providers at the earliest opportunity in order to address requirements associated with new development. It is of concern that there appears to have been no direct engagement with the Development Consortium and local general practices.

11.6 Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand. Digital figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is no prospect in other areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thattham in the foreseeable future.

11.7 GP practices look to create efficiencies and economies of scale to make general practice more financially sustainable. It would extend the range of services and primary healthcare professionals available on a single site. It would make no financial sense for an existing local GP practice to set up a branch surgery on the proposed new development because of the additional land and staffing costs and encumbrance working across two sites.

11.8 There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site where one or more practices could relocate. An enlarged primary healthcare site is required and might be better located closer to the centre to improve access and minimise traffic as the proposed NE Thattham development is peripheral to the centre of the parish. The development to be supported by Thattham Town Council but has not been suggested in the sustainability appraisal of site options. Local authorities with the inadequate 450 sq m floor size proposal which they only discovered with the SP17 Policy of December 2021.

11.9 The proposed North-East Thattham development site is covered by the existing practice boundaries of Thattham Hill Road), Burdwood Surgery (east of Harts Hill Road) and Chapel Row surgery (the whole area). All three practices are run by two Thattham doctors' surgeries run independently of each other, and their combined lists include approximately 2700 patients under 2,000 patients per GP. Newly registered patients moving into housing developments tend to make a greater demand on primary care services. There are more young children, a higher maternity workload, less local extended family support and there is initially a demand for permanent and repeated temporary pharmacy closures in Thattham have further exacerbated pressure on primary care services.

11.10 Thattham dental practices are unable to provide dental care for the whole population with a significant minority of patients further afield for NHS and private dental care. Thattham Vision, endorsed by WBC in 2016, confirmed only 60% of registered patients are served by Thattham dentist (with 17.5% registered with a doctor outside Thattham). There is no evidence provided that either V&P nor the local authority approached any local dental practices regarding the potential impact of increased workload resulting from additional housing developments.

11.11 Reviewing the scanty healthcare recommendations within the Thattham Strategic Growth Study (David Lock and Associates 2016). Present, paragraph 4.10 states: 'A dialogue with the relevant healthcare and education agencies should be established to address concerns that social infrastructure may not be provided.' The Stage 3: Thattham Future report published in 2016 provides no further detail except the outcome of a community representatives' workshop, that the existing GP facilities are at Thattham Hill Road health centre.

11.12 WBC and the developers appear to have neither arranged a relevant HIA nor provided evidence of having approached any local primary care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care and so has the potential to add to the burden that 1,500 or more new houses will make on a local NHS struggling to cope.

11.13 The objective of WBC and the North-East Thattham Development Consortium to improve access to the health services in thattham infrastructure has not been met as they have not provided evidence for the provision of a viable primary care medical centre.

Education Facilities

11.14 The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined in the Local Plan (LPR). There is no coherent end-to-end plan and this therefore breaches the obligations of WBC to provide education services. In the absence of this provision, the Plan for a large new housing development is wholly unsound.

11.15 The lack of effective or justified education provision across the various proposed developments also means that the subsequent impact on traffic. The location of a secondary school in the North East Thattham development under policy SP17 NE Thattham will increase in traffic across the whole Thattham area and this has not been adequately considered in the traffic plans and the LPR.

11.16 There are no details in the LPR of the provision for Nursery or Early Years education. Policy SP17 NE Thattham states that *the site will provide*

Early Years provision.

11.17 The provision for primary school education is unclear and contradictory. There is no data or evidence on the level of demand for 'entry' requirements. The LPR proposes that the sum of £12 million will be sourced from the developers of SP17 to fund the provision of primary education. However, with no recent data available (the only data referenced is from 2011), it is impossible to assess the impact on the delivery of the required education provision.

11.18 The current situation for secondary school students from Bucklebury is that they have a choice of either The Datchet or The Datchet as they are in the catchment area for both.

11.19 Where schools are oversubscribed, children who live nearer to the school are given precedence. This means that children from the NE Thattham development would be able to opt for Kennet and those from Bucklebury would then be limited to The Datchet.

11.20 The LPR is inconsistent, incomplete, and contradictory on the provision of secondary schooling in and around thattham. It is a contradiction to the supporting documentation. It proposes that the sum of £15 million will be sourced from the developers of SP17 to fund the provision of secondary education.

of secondary education. There are no details of the location of the land to be provided and hence no possibility of assessment or achievability.

11.21 The Thatcham Growth Study, produced by David Locke Associates and Stantec on behalf of WBC, proposes a new secondary school, half-funded by developer contribution.

11.22 Government guidelines are that Secondary Schools with less than a 6FE are not sustainable or deliverable. The Growth Study previously stated that the NE Thatcham development (at the time allocated for 2,500 homes) was not sufficient to justify a new secondary school.

5.18 Provision of a new secondary school in North East Thatcham is an essential part of enabling growth in the town. The current provision proposed is not sufficient on its own to fill a 6-8FE secondary school.

5.19 Secondary schools need to be of sufficient scale to make them sustainable and able to provide suitable facilities. It is not considered feasible for a new school to be smaller than 6FE.

11.23 With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a new secondary school would not be sustainable or deliverable in this location.

11.24 Furthermore, the Thatcham Growth Study also noted that the education provision was based on WBDC data of 2011. Clearly the use of 11-year-old data is inadequate.

11.25 The Growth Study states:

4.83 This study has not engaged in a detailed demographic prediction and modelling exercise to determine future population demand across the town and has not attempted to predict the long-term capacities of existing schools. Inevitably education provision will be in more detail as any development comes forward.

11.26 The LPR now states that land (but not the Secondary School itself) will be provided for the development.

11.27 In summary, it is therefore clear that the plan for secondary school provision is 'unsound' for the following reasons:

- There is no satisfactory evidence of the number of pupils the school is to cater
- The location of a school within the proposed development is not
- The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is
- The timing and responsibility for the funding is not clear and has not been adequately costed in the viability
- There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide

11.28 West Berkshire Council, as an education authority, has a duty to make arrangements for suitable school provision to be met across all school years is not defined or evidenced in the LPR.

Sports Fields Provision

11.29 The LPR requires the provision of sports fields and facilities as part of the development of NE Thatcham under policy SP17. Issues not answered in the LPR.

11.30 Firstly, that playing pitches require flat ground. The only flat area of ground in the proposed site is that which is currently used for parking. There is no funding earmarked for these facilities nor has the provision of these facilities been adequately costed within the viability appraisal.

11.31 The objective of WBC and the North-East Thatcham Development Consortium to provide sports fields has not been met. There is no evidence for funding or for a suitable location.

11.32 Overall, it is plainly apparent that there are significant failings with the LPR on whether the provision of infrastructure for sports fields as part of development at North East Thatcham under policy SP17 is viable or deliverable. It is not considered that the LPR has regard nor would the wording of the policy be effective in delivering the infrastructure required for the scope of development at North East Thatcham or set out within the wording of policy SP17.

12. Climate Change and Flood Risk

12.1 BPC has significant concerns that WBC has failed to properly address the impacts on climate change and flood risk, specifically the development of housing at North East Thatcham through policy SP17.

12.2 WBC has included addressing Climate change as a major objective. This is further developed in Policy SP5. However, the principles of climate change mitigation and adaptation will be embedded into new development..." (SP5), development must meet carbon targets. Development "will be expected" to contribute positively to carbon reduction, the plan contained in Thatcham Stage 3 was extremely limited in the coverage of carbon neutrality and the effects of Climate Change.

12.3 Given the scale of the development proposed at North East Thatcham under policy SP17, the proposal should meet the requirements of SP5. The Thatcham Stage 3 document is very sketchy on this area, and only seemed to note that this in detailed building regulations."

12.4 Policy SP17 states that the proposed site will be expected to deliver "on-site renewable energy to assist in the development." Policy DC3, 3.A requires a minimum provision of 20% energy from renewable sources. Policy DC3, 3.B requires renewable energy applications if they are suitable for the area, are accompanied by a landscape assessment, and caused no harm. Given that any form of required renewable energy generation will have a highly detrimental effect on local amenity, the proposal does not address this requirement. There is no mention of this in the Thatcham Stage 3 document.

12.5 Policy SP5 requires developments to provide for "...sustainable forms of vehicular and personal transport..." Given the plan included in the proposal, it is felt that this requirement is far from being met. Thatcham's roads are already over capacity, the railway station and services inadequate, and people are unlikely to walk into the town centre further applying pressure on the roads. This will increase traffic pressures, and rat running onto inefficient roads will be prevalent. All of this increases carbon generation.

12.6 The proposal allocates two bullet points to "Net Zero Carbon Development" and again is woefully inadequate in that a net zero carbon development would be viable or has been costed as part of the viability appraisal produced for the proposal.

Flood Risk

12.7 Flood risk is a significant threat to Thatcham, and so, by interpretation of WBC's own policy SP6, the development under policy SP17 is not appropriate.

12.8 There are available sites at lower flood risk, and so the "and" requirement is not met. Mitigations may be possible at the site will increase flood risk in the town. By WBC's own requirements, THA20 is an inappropriate site. Also, DC6 s

“Development which would overload available facilities and create or exacerbate problems of flooding or pollution without doubt that the introduction of 2,500 houses and associated infrastructure will exacerbate problems. Both DC6 and the nature of this site.

12.9 The Thatcham Strategic Growth Study even reinforces these arguments:

48 “Flood risk and surface water drainage is a key consideration...particularly so within the town of Thatcham where this was experienced in 2007.”

- 48 “There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency data.”
- 51 “The extent of surface water risk to the site is highest at the north-western end of the site, known as Dunston.”
- Box 4.2 “An essential issue to address for development at North East Thatcham is the management of surface water drainage.”
- 8 “Management of surface water drainage is a key concern for development on the slopes above Thatcham”.

12.10 For a development of this size, it is clear that the flood risk to the site and subsequent impact on flood risk to the town (designated as nationally significant ‘Flood Risk Area for surface water flood risk within the 2018 Environment Agency Planning Policy Framework) have not been considered. The LP references the Strategic Flood Risk Assessment (SFRA) for how flood risk will be assessed, but there is very little mention of this proposal, and no known local plan site screening has been published for this proposal.

12.11 The SFRA also states that ‘Areas at risk from surface water or locations at risk of groundwater emergence should be identified to ensure flow routes are not blocked.’ As outlined in the SFRA this proposal site is underlain by clay and therefore is at risk of groundwater emergence. The areas downstream of the site are identified as at high risk of surface water flooding. If this development is approved, it contradicts what it outlined in the supporting SFRA.

12.12 As per the NPPF, priority should be given to sustainable drainage. In the LPR there is no evidence in the plans placed within the development area. As it states within the West Berks SFRA, *flood risk should be considered at an early stage and design of a site to provide an opportunity to reduce flood risk within a development.* It is clear that this has not happened.

12.13 The allocation for policy SP17 states that the proposal will *incorporate Surface water management approaches within Thatcham town.* There is no justification for this statement, or any evidence provided to substantiate this claim.

12.14 The site of THA20 is currently a greenfield site and the development will be subject to meeting the greenfield runoff rate. Developments must limit runoff to below greenfield conditions. It is especially important at this site that the runoff rates be noted that there are a number of factors not taken into account in the national greenfield runoff rate figure which can vary significantly from runoff rates from a site. These include the vegetated land characteristics e.g., grassland, woodland, farmed land and the presence of trees. These are key to this proposal due to the elevation of the land proposed for development and the removal of trees which will increase both surface and ground water. An increase in flood risk to an area that is already identified as a nationally significant flood risk is unacceptable.

Conclusions in respect of Climate Change and Flood Risk

12.15 The Sustainability Appraisal is ambiguous in relation to flood risk. It states that the development at North East Thatcham will have a positive impact but there is also a ‘?’ place in the assessment box. The justification for the assessment given is *requires consideration of SuDS that could deliver net gains for Thatcham, but there is no other reference made to flood risk or requirements for GI, ecology and sustainability measures to be included which may all have a positive impact on flood risk.*

12.16 It is not considered that this is a credible assessment, and the question mark demonstrates that WBC are unsure of the assessment.

12.17 It is not considered that the LPR is justified, effective or consistent with national policy and is unsound on this basis.

13. Water Supply and Foul Drainage

13.1 Currently the water for Thatcham and the environs is extracted at Bishops Green and Speen.

13.2 Sarah Bentley, CEO of Thames Water has recently stated that the current requirement for water per person is 120 l/p/d. The demand for fresh, potable water is having a profound impact on the water table in both the Kennet and Pang River valleys, such as Chichester, Horsham and Crawley this has given rise to significant concern of water neutrality in highly sensitive areas.

13.3 The River Pang that runs through the villages of Bucklebury and the adjacent village of Bradfield completely ran dry through the prolonged dry season but also as a result of the reduced level of the aquifer.

13.4 In the past there are accounts of the river not running (1838 - Environs of Newbury), but this was during the first half of a couple of months and again in 1976. In 2022 the river did not run for a considerable time and, even after the very wet winter, it was still bone dry in November and not really flowing until 9 December 2022. A devastating impact on the environment has been caused by over extraction at Compton and neighboring extraction points and is in complete contradiction to the Water Framework Directive Regulation 19. There are no mitigation measures, the only action is to make this the sole responsibility of Thames Water.

13.5 The Infrastructure Plan also points out this is a major problem in sections 5.65 & 5.66.

13.6 Thames Water (TW) is responsible for supplying the entire West Berkshire area with water. The WCS identifies significant serious water stress, in common with the rest of the South East. It comments that the more stringent water efficiency requirements of 110 l/p/d allowed under Building Regulations is justified, however West Berkshire Council may want to consider going further, particularly in larger strategic developments.

13.7 The WCS states that growth plans defined in Water Resource Management Plans (WRMPs) are broadly in line with the West Berkshire Council. “The WRMP does not predict a supply-demand deficit, except in peak week or drought conditions. The WRMP planning period to improve resilience”.

13.8 It is unsound to state that there is no predicted supply demand deficit when we are experiencing predicted extreme water stress. We have had a hose pipe ban in force for weeks, it was only lifted on 22 November 2022. The existing infrastructure in Bucklebury is old and in poor condition and suffers from numerous bursts and fractures.

River Pang – 26 October 2022 [see page 52 of attachment ‘Andrew Black Consulting (Bucklebury Parish Council)’ final report]
River Pang once it started flowing again – 9 December 2022 [see page 52 of attachment ‘Andrew Black Consulting (Bucklebury Parish Council)’ final report]
photo]

13.9 By adding a larger pump and increasing the pressure the problem is only exaggerated.

13.10 There is a lack of evidence or supporting information on how the developers of North East Thatcham will achieve water neutrality.

Sewage

13.11 Thatcham, Newbury and the surround district is service by Thames Waters sewage treatment plant in Lower Way (and Dia 15") running from Faraday Road to Lower Way that are cast Iron, in poor repair and over 100 years in age. The sewage and surface water from the older area of the town as many of the properties have combined down pipes. The Turnpike serving that area with a pumping station at Beedon Hill. Another pipe from the pumping station in Station Road is a gravity feed system feeding all the current estates in the north of Thatcham and the town centre. This facility also smaller village septic tank systems tankered into Lower Way and commercial septic/cesspool collections.

13.12 Currently there are 600 new houses being constructed near Vodaphone, 167 the new flats at Boundary Road and 200 houses near the Tesco Supermarket (Retail Park). 100 houses with planning approval in Lower Way. In total 1,024 extra development (say and additional $1024 \times 300 = 307,200$ litres/day). The current TH.20 proposal add an additional 1,500,000 litres per day).

13.13 The current system at Lower Way has a maximum intake capacity of about 600 litres/second. If the input figure frequently occurs, the foul water is fed into two overflow tanks. The regulated input is fed into Fermentation Settling Tank system with percolating filter. If these are over capacity, or if the overflow tanks are full, raw sewage is delivered directly to the river.

13.14 There is no mention of how the infrastructure is going to be improved with regards to this simple sewage requirement is 150 litres per person per day, that is a staggering additional 450,000 litres/day from just SP17 that has been does not take into account and surface water that might have been connected to the sewer system, new buildings and necessary infrastructure and, more importantly, the above additional input from the recent developments. In our equity, additional 1,100 dwelling built recently at The Race Course (330,000 litres/day).

13.15 This waste water facility that is already over capacity and has been for the past twenty years will also be expected to deal with sites designated HSA1 to HSA7, HAS17 & HAAS22.

13.16 West Berkshire Council (WBC) has just passed this burden on to the Thames Water utility company (please see the Development Plan: 5.36), but where is the public consultation and due diligence when referring and developing the infrastructure plan?

13.17 Without the necessary infrastructure the proposed housing development in this area is ill considered and will certainly increase the Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) on the outflow will certainly have to increase. It is very apparent that there is very little room for further expansion on the site, maybe an additional storage tank? But the risk of pollution into the Kennet, far from it.

13.18 If the outdated plant cannot cope with the increase in flow, then there is no option other to increase BOD (and COD) into the Kennet and this will exceed the permitted percentile limit set by the Environment Agency. The only other option for compliance demand therefore is to reduce the maximum compliance Limit!

13.19 This is completely contra to the Water Framework Directive cited in Regulation 19 as these are for restoration of the river. Pollution into the Kennet basin without adequate provision is just - wrong. Please note that much of the drinking water comes from this source and is abstracted at Fobney downstream of this Lower Way and the proposed development.

13.20 It is inconceivable that in the twenty first century this, untreated discharge, can be allowed. To compound the problem, the facilities at Kintbury and Hungerford discharge directly into the river during peak flow periods – criminal and an environmental disaster.

13.21 West Berkshire Council has allegedly identified the requirement, it is mentioned in 5.63 of Infrastructure Development Plan: 5.63 *The Study indicates that "new homes require the provision of clean water, safe disposal of wastewater and protection of large numbers of new homes in certain 35 locations may result in the capacity of existing available infrastructure to service them could potentially cause service failures to water and wastewater customers, adverse impacts to the environment, or health and wastewater assets being passed on to the bill payers."*

Conclusion

13.22 If this problem has been clearly identified by WBC, surely no planning development should be considered until the problem is solved. The existing sewers and infrastructure feeding Lower Way are a real matter for concern, as there is no simple method of solving this Victorian system, short of excavating the A4 main road while this extensive works could be carried out.

13.23 There is absolutely no doubt that the existing infrastructures is failing with extreme infiltration identified in Faraday Road a very large iceberg. Recently an old section failed on the junction to Hambridge Road, which hopefully, is well documented but will have resulted in surface and subterranean pollution.

13.24 The LPR just touches briefly on the subject with the casual "suitable land and access is safeguarded for the maintenance of resources and wastewater, flood defences and drainage infrastructure". Where is the detail? potential developers, residents need this information.

13.25 The development Plan Control Policies 10.45 States:

Developers will need to demonstrate that existing, planned and/or committed infrastructure is sufficient to accommodate the development. This includes demonstrating that there is adequate water supply, surface water drainage, foul drainage and sewage treatment infrastructure off site to service the development. Necessary improvements to sewerage water treatment infrastructure will be programmed and need to be completed prior to occupation of the development. This is to ensure that such infrastructure is in place on the environment such as sewage flooding of residential and commercial property and pollution of land and water. This may make it necessary for developers to arrange for appropriate studies to ascertain whether the proposed development is compatible with the existing local infrastructure. Where there is a capacity problem in the local network developers will be expected to fund infrastructure improvements.

13.26 If this is adopted and implemented by West Berks Council (WBC), any planning developments should be refused unless a condition is submitted by developers and approved by WBC. This is a key clause and should be fully implemented and enforced.

13.27 The Local Plan Review does not mention any improvements to the existing sewage network or planning provisions. It alone make the current proposal unsound.

14. Conclusions

14.1 These representations make it abundantly clear that there are significant failings with the soundness of the plan.

14.2 The LPR is **not positively prepared** and would not achieve the goal of sustainable development for WBC.

14.3 The LPR is **not justified**. Many of the grounds for assessment of impacts and benefits lack credibility and are not credible. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of land is an appropriate strategy for WBC.

	<p>14.4 The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is</p> <p>14.5 The LPR is not consistent with national policy. In many instances the allocation for development of North Ea would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.</p> <p>14.6 The process of assessing the impact of development under policy SP17 through the sustainability appraisal is f which can be easily remedied through modifications to the plan.</p> <p>14.7 The process for selection of North East Thatcham as a development site is severely flawed and lacks evidence.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	BPC has wider concerns around the way in which WBC has undertaken the consultation process for the LPR and th Failings with Duty to Cooperate are matters which are not capable of being remedied in advance of the plan being s set out further details of these failings to the inspector should the plan be submitted to the Planning Inspectorate by
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence t statements and oral evidence from experts.</p> <p>To provide updated evidence to the examiner. For other relevant experts employed by parish council to give detailed</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pike, Simon
<p>Consultee Full Name</p>	Simon Pike
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1318
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Housing allocation for North East Thattham</p> <p>[Representation part of a wider rep for SP17]</p> <p>The draft Local Plan was approved to move to Regulation 19 Consultation by a meeting of West Berkshire Council on [redacted] was given on the basis that the size of the development when complete would be approximately 1,500 dwelling. The decision stated:</p> <p>"Councillors allocated a new strategic development of 1,500 new homes in north-east Thattham, a significant decrease from the [redacted] proposed."</p> <p>"We have cut the proposals for any future development in north-east Thattham by 1,000 homes, which is a big change from the [redacted] proposals."</p> <p>The emerging draft Local Plan (December 2020) stated at paragraphs 6.12 and 6.13:</p> <p>"This includes the strategic allocation at North West Thattham for up to 2,500 homes where delivery of at least 1,250 homes is anticipated within the plan period."</p> <p>The Local Plan Submission draft (January 2023) states in Policy SP17: "The site is to be allocated for approximately 1,500 homes to be completed within the period of the plan.";</p> <p>at paragraph 6.22: "additional housing supply on newly allocated sites ... includes the strategic allocation at North West Thattham for up to 2,500 homes within the plan period.";</p> <p>and at paragraph 6.61: "Delivery of approximately 1,500 dwellings is anticipated within the plan period."</p>

	<p>Policy SP17 is silent on the possibility of additional dwellings following the plan period.</p> <p>Policy SP17 also states: "The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site that these guiding principles have been positively responded to."</p> <p>The Thatcham Strategic Growth Study was prepared for a site allocation of 2,500 dwellings, and has not been updated. There has been an interpretation that one of the 'guiding principles' of the Growth Study is a final size for the development of 2,500 dwellings. Even worse, an applicant for planning permission might 'cherry pick' a site allocation of up to 2,500 dwellings with the SP17 that are based on the needs of 1,500 dwellings.</p> <p>The wording of Policy SP17 is therefore unclear and ambiguous on the expected final number of dwellings on the site. It is therefore not evident how a decision maker (whether West Berkshire Council or the Planning Inspectorate in case of a refusal) should apply the policy.</p> <p>Paragraph 16 of the NPPF (July 2021) states that: "Plans should: d) contain policies that are clearly written and unambiguous so that a decision maker should react to development proposals". Policy SP17 is therefore not in accordance with Paragraph 16 of the NPPF and is not consistent with national policy.</p> <p>NOTE: as stated in other representations, I believe that the number of 1,500 homes needs to be reviewed. This represents a lack of clarity of the wording, and not the number.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	To make this aspect of policy SP17 sound, it must be clarified that the number of dwellings defined in the second paragraph is the total number when development is completed, and not just the number completed during the plan period.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	If it would assist the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Saini, G
<p>Consultee Full Name</p>	Mr G Saini
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1637
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am writing to raise objection to the proposed plan to build 1500-2500 houses in NE Thatcham. We have lived here in Thatcham for several years, and over that time with the increased development and new houses we have noticed a distinct deterioration in the local area, specifically with regard to medical services for which we have seen waiting times to see clinicians increase as well as number of pharmacies decrease or overwhelmed medication dispensation. These services are already over-subscribed and likely to become worse as more housing is built here that, despite government 'marketing', that generally there are national problems in provision of adequate health and social care. The north Thatcham area is likely to become worse as more demand will be placed on current services by an increased population. Mandating and increased funding for healthcare services provision we have to strongly object to the proposed housing development.

	We have also in our time seen the level of local traffic increased and an influx of new housing will only make this situation worse. This raises concerns around traffic safety especially with the amount of children going to and from schools in the area. The lack of adequate shopping and parking spaces has not increased accordingly. This situation in our opinion will become worse with development.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1322
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No

<p>Please give reasons for your answer</p>	<p>SA/SEA Appraisal for Policy SP17 - number of homes</p> <p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires the consideration of the proposed policy</p> <p>The SA/SEA Environmental Report describes that only a single alternative was considered in the Interim SA/SEA for Policy SP17. For the Regulation 19 Consultation, two alternatives are considered, for 1,500 homes and 2,500 homes – and there were also alternatives with fewer than 1,500 homes were not considered.</p> <p>The SA/SEA states that “A large strategic site can deliver a number of positive benefits”. This is undoubtedly true, but it is not false:</p> <ul style="list-style-type: none"> - The two primary schools proposed in SP17 could be located on two smaller sites. - The “local centres providing local retail facilities and small-scale employment for community use”. could be distributed across the area. - A site of either 1,500 or 2,500 homes is not sufficient by itself to support the provision of secondary education. <p>The SA/SEA for Policy SP13 states that the only considered is the one in Policy SP17: “Due to the proposed strategic allocation in Thatcham, it is not considered appropriate to allocate any further sites in the area. All sites have been assessed.”</p> <p>Therefore, the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) for Policies SP1 and SP13 are not considered.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>SA/SEA Appraisal for Policy SP17 - number of homes</p> <p>[Representation part of a wider rep for SP17]</p> <p>As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>

4. Proposed Changes	The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) needs to consider 'reasonable alternatives'
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1343
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	S Pike Attachment 2.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>[Same comments submitted in PS1808 under Appendix 2 Settlement Boundary Review]</p> <p>[Representation part of a wider rep for SP17]</p> <p>[See attached document Attachment 2]</p> <p>Appendix 2 of the draft Local Plan defines Settlement Boundaries as follows: "They identify the main built up area of a settlement and the area which is considered acceptable in principle, subject to other policy considerations."</p> <p>This definition creates a presumption in favour of development unless this would conflict with policies within the Local Plan.</p> <p>The area for housing will in any case need to be reduced from what was envisaged in the Strategic Growth Study, in densities defined in the West Berkshire Density Pattern Book. The settlement boundary needs to reflect this.</p> <p>Appendix 2 states that "Boundaries will exclude: Recreational or amenity open space which extends into the countryside in form and nature. This includes designated Local Green Space." The map on page 65 shows three areas of "Local Green Space" adjacent to the 'site boundary'. These are clearly 'recreational or amenity open space' – so must be outside the settlement boundary. There is no supporting evidence to support their location and size – so their position on the map must be considered incorrect.</p> <p>Paragraph 6.58 of the draft Local Plan states: "The new revised settlement boundary will be defined following the settlement boundary policy at the application stage."</p> <p>The 'red line' boundary map of the map on page 65 of the draft Local Plan is described as the "North East Thatcham settlement boundary" of site THA20. However, this same boundary has been incorrectly transferred to the Policies Map and shown in map 1 of the Settlement Boundary Review paper as the settlement boundary.</p> <p>The 'Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty West Berkshire: Report Thatcham (August 2015)' by Kirkham Landscape Planning Ltd provides an assessment for site THA20. The settlement boundary of Thatcham to its north. The existing housing adjacent to this site extends to a higher elevation than the settlement boundary to SP17.</p> <p>This report concludes for THA11:</p> <p>"It is recommended that only part of the site should be pursued further as a potential housing site ... to conserve and enhance the character of the land north of Thatcham:</p> <ul style="list-style-type: none"> - The potential development area is ... limited to land on the lower slopes lying below the 95m AOD contour" <p>West Berkshire Council has commissioned studies of landscape capacity for a substantial part of this site in relation to the application for Siege Cross. West Berkshire Council's expert witness on landscape was Bettina Kirkham DipTP BLD. Her Statement of Case to the appeal inquiry provides the following conclusion:</p> <p>"The site contains pasture farmland, within well-established woodlands, and mature hedgerows. It is also on rising ground on the southern flank of the open countryside hillside ridge of the AONB above Thatcham. Extending from 75m AOD to 105m AOD, this area lies well above the local limit of development of 90m AOD and above the limit within eastern Thatcham of 95m AOD. Any development on the appeal site would therefore be an extensive arm into this open elevated and prominent landscape. It is clearly not in keeping with the landscape as it will intrude into an overwhelmingly rural landscape, which forms an intrinsic part of the wider landscape between Thatcham and the settlement beyond a clearly defined and established landscape boundary to the settlement."</p> <p><i>This document is provided as Attachment 2 to my representations (paragraph S.12 is copied above).</i></p>

	Therefore, the available evidence on the landscape character and capacity for the North East Thatcham site indicate extend above the 95m AOD contour, and probably not above the 90m AOD contour.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	<p>The term “settlement boundary” is not used in legislation or Government guidance on planning. There is therefore no in a Local Plan to fall within a settlement boundary. It is clearly premature to specify any new settlement plan, and in of the draft Local Plan.</p> <p>The map on page 65 of the draft Local Plan provides a way forward, because it shows the boundary of the site, rather than (i) Paragraph 6.58 needs to be modified as follows: “The new revised settlement boundary will be defined <u>within the ‘North East Thatcham’</u> in the accompanying map.’ following the studies and work identified in the policy for a development of <u>at most approximately 100 dwellings</u> application stage. <u>The settlement boundary will exclude any country park or public open space on the edge of the development</u> (ii) The settlement boundary on the Policies Map needs to be restored to its current position – along Bath Road and Floral Way. Paragraph 6.58 of the draft Local Plan.</p> <p>(iii) A revision of the document ‘Settlement Boundary Review (SBR) December 2022’ needs to be published, in which to show the settlement boundary in its current position – along Bath Road and Floral Way.</p> <p>If however, the Examination concludes that it is appropriate to modify the settlement boundary for North East Thatcham, the settlement boundary should extend no further than the 95m AOD contour, in line with the recommendations of the “Landscape Character Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire (August 2015) and the statements of West Berkshire Council’s expert witness for landscape at the Planning Appeal for North East Thatcham (August 2015) (if, however, the Examination concludes that it is appropriate to extend the settlement boundary for North East Thatcham, not support, because this needs further analysis), the new settlement boundary should certainly not extend above the 90m contour, in accordance with the best available evidence on landscape.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Robertson, Peter
Consultee Full Name	Peter Robertson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1549
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	04/03/2023 09:43:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>*LATE RESPONSE*</p> <p>I'm writing to strongly object to proposed north-east Thatcham development.</p> <p>I have been living close to Thatcham for 39 years and during that time I have seen massive expansion in what was once a small town. The infrastructure of the town has not really been coping for at least a decade. If this latest expansion goes ahead the town will be overstretched further.</p> <p>Healthcare</p> <p>As a Thatcham GP for over 30 years I know from personal experience how stretched healthcare is. During my time at Thatcham Cross, Dunston Park and the estate on the old army depot. The last two estates were built without any additional healthcare provision.</p>

	<p>assurances that this would be the case. The result was that the two existing surgeries in Thatcham and also the surrounding villages have seen the increased population. Newly located families tend to be quite high demand and of course GP list sizes increased to accommodate these services.</p> <p>Transport</p> <p>There will inevitably be a significant increase in the amount of traffic both in Thatcham town but also the surrounding villages. The increase in traffic to Floral Way and Harts Hill Road will result in traffic being diverted towards Upper Bucklebury and potentially lead to increased traffic in the villages of Cold Ash and Chapel Row.</p> <p>Environment</p> <p>With an additional 3000 to 4000 extra residents there will be a greater demand for access to green spaces for recreation. The original Thatcham Growth Plan had a proposal for two country parks in the near vicinity. Not surprisingly no details of these country parks would be developed. More worryingly the current management proposal for Bucklebury Common has placed a significant strain on the fragile ecosystem that already exists. I live in Bucklebury Common and over the last 30 years I have seen a significant increase in littering, fly tipping, trial motorbike riding and four-wheel drive abuse. This will inevitably increase with the additional residents in Thatcham. As the site for the new development is also a greenfield site this obviously results in a negative impact on the environment.</p> <p>Education</p> <p>As with healthcare I am aware that this new development will put significant pressure on the existing school provision. There is currently a vague plan to build a further secondary school but there is no active negotiation with the Education Department for this purpose. I have heard that the developers will contribute £15 million towards overcoming this problem but will not be able to deliver on two different things.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bennett, Melissa and Charles
<p>Consultee Full Name</p>	Melissa and Charles Bennett
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1619

Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	As family residents of Upper Woolhampton (address/ details below), we object to your plan as we find it unsound and have the following objections: 1. Increase in traffic pollution and hazards in Upper Bucklebury and Chapel Row. The WBC predicts 'some displacement of traffic to routes such as Upper Bucklebury' which we seriously object to. We moved to this area to live in the countryside and avoid traffic and pollution. Over the 10 years or so we have lived in Upper Woolhampton, we have already noticed a significant increase in traffic on Upper Woolhampton and Bucklebury roads. The introduction of such a huge development to the area would necessarily increase traffic pollution and hazards.

hazards to cyclists and walkers and dog walkers (a number of neighbours have sadly lost dogs on the road hit by sp including snakes, have been run over) and cause significantly more disturbance to the residents and nature, on wha unlit roads and lanes.

2. Significant increase in traffic on the A4 which is already busy and gets heavily congested at peak times. When the delays/congestion on the A4, drivers resort to the rural routes which are simply not designed for these increased traff in the area stands to significantly increase the traffic volume on our rural roads that are not designed for any increas ever be!) Increase in traffic and increased potential of speeding through Upper Bucklebury, which is of a major conce many family residents with children (and pet dogs/ cats). With an increase in traffic, this will only worsen the situatio

3. Access and junctions – The transport assessment at para 3.26 shows NO modelling result. Why is this?

4. The proposed new carpark on Harts Hill will only add to more traffic on an already dangerous road and may also p behaviour.

5. I see absolutely NO positive impact on current (or any) residents on significantly increasing cars on our roads, wh the safety and enjoyment of walking, cycling – NOT increase it as the council claims!?

6. West Berkshire declared a climate emergency on 2 July 2019.

https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000

WBC - Environment Strategy - with declaration of climate emergency. Building 1500 new houses will certainly increa goes against the emergency/accelerated goal of carbon neutrality and "protecting and enhancing our natural environ certainly be created by the entire construction process, increased light pollution from the development and more car pollution and noise pollution to our rural area. There are seemingly NO environmental advantages of building a mass large development can only bring negative environmental impact and therefore goes against the intent, statement and p strategy.

7. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt in our area. The vision and village community, for the village to remain a predominantly rural AONB. That there is no wish amongst residents to alle and nature of our historic, rural community identity. This document is approved and agreed with WBC and should be in consideration – yet it is not mentioned in the WBC documentation!?

8. Loss of village identity. There is simply not enough space between the proposed development and Upper Bucklebu WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the deve WBC's own intentions.

9. Unacceptable impact on our AONB. According the gov.uk, an AONB has to a combination of several criteria, two o

- relative wildness, such as distance from housing or having few roads
- relative tranquillity, where natural sounds, such as streams or birdsong are predominant.

Both of these points stand to be significantly impacted by such a massive nearby development and may no longer b

10. Impact on Nature. We have seen a number of protected species including the great crested newt, adder, slow wo Bucklebury Common. There are also birds such as the nightjar, which are under conservation concern. We fear incre visiting the area of outstanding natural beauty will have a large negative impact. Wildlife like this needs to be protect The development to the south of Blacklands Copse and Harts Hill Copse will mean open space dramatically reduce adding more pressure on species in decline. Over the last 7 years we have seen a significant increase in the litter in tipping in the area. Bringing significantly more people to the area stands to cause more problems like this and more d ecosystem.

11. Bringing more houses and cars to the area will significantly increase the noise and light pollution to a predomina people live to escape from developments like the one proposed.

12. The proposal is an over development of the countryside of rolling hills and farmland and also stands to overdevel development is out of character for the area plans and will have a detrimental impact for the town itself as well as the is at capacity as it. Pre-covid, it was often hard to find a parking space in the town centre, doctors/dentists are appar parking at the train station and already almost full train services at peak times into London. Not to mention the traffic is no evidence that the development will enhance Thatcham town centre (or indeed Newbury).

13. A previous application was resoundingly rejected by the secretary of state in 2017

<https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html>

Why, only a few years after this, are WBC now considering this site in light of the previous rejection, what has chang application has been refused once and that there is clearly significant local objection again, why have massive funds

14. Re Healthcare – neither WBC or the developers, as public and private stakeholders appear to have arranged or pu to the proposed N-E Thatcham development.

15. There has been no direct engagement between the N-E Thatcham Development Consortium and the local GPs.

16. Few new GP practises are commissioned by NHS England and there seems very little realistic prospect of a ne in Thatcham or West Berks in the foreseeable future. The current GP practises are extremely busy - overstretched - a any further capacity to add so many potential new residents to their lists. There has been no approach by WBC or th practise to discuss possible relocation and expansion of a current practise.

17. Thatcham dental care are unable to provide dental care for the current population. There is no evidence that WBC o any local dentists about their capacity/ ability to work with the plans – or not!!

18. WBC and the developers appear not to have arranged a relevant HIA or provided evidence of having appropriate agencies or providers. They are proposing a healthcare site that is unsustainable and therefore have not made provi 1,500 or more new houses. Local NHS provision is significantly unsatisfactory for these new houses. This is not impro worse for everyone. They have not provided evidence for a viable primary care medical facility.

19. There is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, the will have a significant negative impact. IN a time where we need to protect species – particularly pollinators – a nega sustainability is not acceptable.

	<p>20. SP17 has no proven plans for providing adequate green space and protecting biodiversity, so there will be spill-over areas.</p> <p>21. Schooling – the provision of extra schooling is not clearly defined. Secondary schools are currently over-subscribed, school provision is unsound with no clarity on that the proposed funding is sufficient to meet the council obligations and if the numbers will even be high enough to sustain a new school!? Many local families are very concerned that the proposed local village schools that currently attract a good number of pupils and maintain a good balance of class sizes. Just because there are new schools, it does not mean that new families moving to the area will necessarily choose them. Many may well prefer the sought-after, traditional village schools, causing increased class sizes, over-stretching of school resources, increased pressure on small rural villages.</p> <p>22. West Berks Council has a duty as an education authority to make arrangements for suitable school provision. How this is done for all school years is not defined or evidenced. Please do keep us posted with an update on this important matter.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Spriggs, Andy
Consultee Full Name	Andy Spriggs
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1647
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type * E-Mail * Letter * Other</p>	E-Mail

* SMS * Web * Unknown	
Response Date	03/03/2023 16:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would like to object to this application, which I believe to be unsound.</p> <p>I now understand that there is going to be an exit from the site to the north, on to Harts Hill. The road from here all the way to Chapel Row and Bradfield Southend is already busy with farm traffic, commercial traffic (e.g. delivering to McVeigh Farm), school traffic and parcel deliveries. This is a road that used to be used by cyclists and occasional cars and it is now being used by many more vehicles using it already. The area on Union Road, as it approaches Common Hill is incredibly narrow and often results in a tractor meeting a tractor. This road is not suitable for the current traffic load and certainly could not cope with a large additional traffic load. This wasn't on the original plan and adding it will provide a rat-run for traffic from the site, that would normally have gone on these narrow rural roads. It's really unsuitable and unsafe; and the way it has been added without reference and without consultation is very concerning. I drive along the road from Chapel Row to Theale or from Chapel Row to Thatcham most days; the current traffic load witnessed (involving cars, bicycles, tractors and wildlife) is already too high and adding a significant amount of additional traffic will increase the likely impact.</p> <p>I am particularly concerned about the impact on GP services. It already takes a long time to get a GP appointment at the current Surgery. The plan suggests that a new GP surgery will be built but suggests that people will be moving in before the new surgery is built.</p>

	<p>staff are recruited. Site residents are not going to wait for the new surgery to be built before accessing health services demand on existing supply. The right way to do this is to put the supporting services (not just for health, but that is the first and only after that, build the properties to allow the residents to move in. The current plan is unsound as it does not. I am a <AGE REDACTED> pensioner who had <PERSONAL INFORMATION> and I need GP support. My wife will not move to this site is accepting residents. It is a frightening prospect that access to a GP could get even worse than it is at present.</p> <p>I have other concerns which I am happy to share later, but I believe that the description above identifies the two issues I like to object because the current plan doesn't take any account of my needs (and the needs of many others) as a local resident. It is unsound.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	I am prepared to appear at the public enquiry, if invited
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Gerdes, Annabelle
<p>Consultee Full Name</p>	Annabelle Gerdes
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1726
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	03/03/2023 16:29:00

Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	<p>I write with regard to the WBC LPR Regulation 19 Objection - SP17. As a resident of Upper Bucklebury I am still struck by the significant impact the development will have towards our local environment and the impact on key services such as schools which I believe have not been thoroughly considered nor the necessary changes made in the Consultation Statement. Therefore, I ask for the comments below to be taken into account for this round of consultation.</p> <p>Objection 1 - Environment</p> <p>At a national scale, we cannot afford to continue damaging our environment and prevent it from becoming a main focus, even at a local scale of Upper Bucklebury, in order to sustain crucial flood risk management. The documentation provided by WBC in support of the draft LPR shows no evidence to suggest that it will have a positive impact on the environment. This to me is appalling as building a sustainable environment is a priority of WBC. The new proposal for 'community parks' in the SP17 instead of the original 'country parks,' only shows the inconsiderate commitment WBC has to protect the environment and the upholding the countryside landscape around us. This negativity against the environment is in direct contrast to the LPR's Sustainability Appraisal which accepts how the SP17 will have a negative impact on the environment's sustainability: 'The site is a greenfield site and therefore, would result in a negative impact on the environment.'</p>

sustainability which would need to be mitigated.' This mitigation is not highlighted in the plan and once again proves how the impact towards the environment is not being acknowledged.

For me this is devastating, how can you continue to not put the environment at the forefront of your plans?

Objection 2 - Education

The LPR does not have specific details upon how Nursery or Early Years will access the new housing. It states how the housing will be made 'affordable' thus suggesting it will attract young families, leading to an increased number of young children who need to access Nursery who will not be able to be put on the surrounding nurseries. Moreover, for Primary education, the LPR appears to lack evidence for the planned numbers of schools. For Secondary education, the schools (Kennet School or The Downs) are already oversubscribed - which is putting more pressure on resources and the quality of education for its students.

Objection 3 - Healthcare

I take note of SP17's proposal for a primary healthcare facility, which indicates it will be managed by an appropriate public health body. However, even in locations where there is a need, the construction of a few new GP centres, and data in the public domain indicates that other regions have struggled in West Berkshire. So, it would appear that there is absolutely no chance of constructing a new facility with funding from the NHS. Due to the increased expenses required and the impracticality of building on green sites, it would also not make sense for an existing local practice to open a branch on the new sites.

Each of the three currently operating practices that serve the area is already overburdened. According to statistics, each Doctor is responsible for slightly under 2000 patients—and the recent addition of pharmacies in Thatcham have added to this burden.

Conclusion

In conclusion, I object to the LPR Regulation 19 Objection - SP17 for the reasons highlighted above. On a personal level, I believe the damage to the AONB land will ruin the heritage of Upper Thatcham and the connection residents have had with the local environment and countryside for years. The impact on the landscape that will be ruined. The poor consideration by WBC towards the impacts on the environment is why I object.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination

- * Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cooke, Joanna
Consultee Full Name	Ms Joanna Cooke
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1316
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 13:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>Increased traffic. I am very concerned about the amount of increased traffic that the development will bring to not only the village of Cold Ash but also other nearby villages such as Cold Ash. In particular I am extremely concerned about the plan for an exit at the north end of the development onto Harts Hill Road. There are no modelling results for this junction in the Transport Assessment and no drawings or photographs for all the other proposed junctions, I find it very worrying that the proposed junction on Harts Hill Road does not appear to have been researched fully. As anyone who frequents Harts Hill Road will be able to confirm, this road is completely inadequate for the amount of traffic it carries, no pavements and has a high potential for serious accidents, as can be confirmed from just earlier this year with large numbers of accidents on the icy road and with the police having to be called out to at least one accident due to the road conditions.</i></p> <p><i>Safe and sustainable transport. I question the Council Assessment that states 'the policy is likely to have a positive impact on walking, cycling and public transport' will be critical to the design of the site.' Considering WBC also contradicts itself by predicting that there will be 'some benefits from wider rural rounds such as Upper Bucklebury, I fail to see how both statements can be true when the rural route leading to the development is inadequate and unsafe for the reasons previously stated above.</i></p> <p><i>I also question the council statement that 'the policy is likely to have a significant impact on walking, cycling and public transport should be designed with these in mind.' Firstly, the popular and scenic walking route over the fields between Upper Bucklebury and Thatcham should be replaced with houses, and I do not how this can be considered a positive change. Secondly, the increased traffic on Harts Hill Road is this even more dangerous for cyclists, and it is already dangerous to the point where I would not cycle along it myself. Considering that I am expecting my oldest child to start attending Kennet School in September, it would be an extreme inconvenience for me to cycle to and from school, especially as sustainability is something that is important to me, however there is absolutely no chance of considering allowing her to cycle on Harts Hill Road as it is already too dangerous, narrow and busy for cyclists to feel safe on – which will put both the local public transport service under yet more pressure and also make it more difficult for residents to access public transport due to the increased traffic on Harts Hill Road – will be a positive thing.</i></p> <p><i>Primary school and nursery provisions. There are no details in the LPR for the provision of nursery, early years and primary school data or evidence on the planned number of schools or form entry requirement, and with the only referenced data being from 2010, this can be relevant to current requirements.</i></p> <p><i>Secondary education provision. Currently, many children from Bucklebury attend Kennet School (our nearest catchment school) every single year. As children who live nearer to the school are given precedence, this would mean that children from the development would take priority, although Kennet would be very unlikely to be able to accommodate all of them. Children would have to go to The Downs, which firstly they are only in a secondary catchment for, and secondly is a 45 minute bus ride and a long journey to Kennet.</i></p> <p><i>It is clear that already there are not enough secondary school places in Thatcham and therefore a secondary school would be a matter of necessity for this proposed development. However, there are no details of the land to be provided. In addition, it is clear that the NE Thatcham development is not sufficient to fill a 6 Form Entry secondary school on its own, so it is unclear how it can be at all, and the plan is therefore not even considering the effect this would have on the children already living in the local area. The development would be unable to attend their local school. Obviously, it goes without saying, that forcing children to attend a school further away will both contribute to the increased traffic issues and will be extremely detrimental to sustainability objectives.</i></p> <p><i>Sports fields. The LPR mentions providing sports fields, however these need to be on flat ground of which the only suitable area is the area and therefore in the area with the most traffic fumes (see my earlier point regarding transport, for info on increased traffic). There should be any funding for these facilities, and the LPR also seems to assume that the school playing fields (assuming the school is built) can be available to use as sports fields. Obviously it is highly unlikely that this would be the case, as schools would not be able to use their grounds, for safeguarding reasons among many others.</i></p> <p><i>It is extremely concerning that the LPR fully states its intent to purposely direct extra traffic straight into the area of A4 traffic onto wider rural routes such as Upper Bucklebury). It is clear that the proposed development on a greenfield site and which currently provides a home to legally protected wildlife will have a huge detrimental effect to the local environment.</i></p> <p><i>A request for an access road for just five new homes in Cold Ash has recently been refused by the council due to the impact this would cause. The same argument also applies for this development, only on a much larger scale. I cannot think of a better way to impact, than situating thousands of new homes on greenfield land just a mile from the AONB.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p>	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1668
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	Thatcham Town Council_Press Release Dec 22.docx
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The draft Local Plan was approved to move to Regulation 19 Consultation by a meeting of West Berkshire Council on 12th December 2020. The decision was given on the basis that the size of the development when complete would be approximately 1,500 dwelling. The decision stated:</p> <p>“Councillors allocated a new strategic development of 1,500 new homes in north-east Thatcham, a significant decrease on the 2,500 homes previously proposed.”</p> <p>“We have cut the proposals for any future development in north-east Thatcham by 1,000 homes, which is a big change from the 2,500 homes proposed below - See attached document <i>Thatcham Town Council_Press Release Dec 22</i>)</p> <p>The emerging draft Local Plan (December 2020) stated at paragraphs 6.12 and 6.13:</p> <p>“This includes the strategic allocation at North West Thatcham for up to 2,500 homes where delivery of at least 1,250 homes is expected within the plan period.”</p> <p>The Local Plan Submission draft (January 2023) states in Policy SP17: “The site is to be allocated for approximately 1,500 homes to be completed within the period of the plan.”;</p> <p>at paragraph 6.22: “additional housing supply on newly allocated sites ... includes the strategic allocation at North West Thatcham for up to 2,500 homes within the plan period.”;</p> <p>and at paragraph 6.61: “Delivery of approximately 1,500 dwellings is anticipated within the plan period.</p> <p>Policy SP17 is silent on the possibility of additional dwellings following the plan period.</p> <p>Policy SP17 also states: “The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site that these guiding principles have been positively responded to.”</p> <p>The Thatcham Strategic Growth Study was prepared for a site allocation of 2,500 dwellings, and has not been updated since 2017. It should therefore be interpreted that one of the ‘guiding principles’ of the Growth Study is a final size for the development of 2,500 dwellings.</p> <p>Even worse, an applicant for planning permission might ‘cherry pick’ a site allocation of up to 2,500 dwellings with the site allocation of 1,500 dwellings in Policy SP17 that are based on the needs of 1,500 dwellings.</p> <p>The wording of Policy SP17 is therefore unclear and ambiguous on the expected final number of dwellings on the site. It is therefore not evident how a decision maker (whether West Berkshire Council or the Planning Inspectorate in case of an appeal) should interpret the policy.</p> <p>Paragraph 16 of the NPPF (July 2021) states that: “Plans should: d) contain policies that are clearly written and unambiguous so that a decision maker should react to development proposals”. Policy SP17 is therefore not in accordance with Paragraph 16 of the NPPF and is not consistent with national policy.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	<p>To make this aspect of policy SP17 sound, it must be clarified that the 1,500 dwellings is the final number when development is completed during the plan period.</p> <p>Supporting evidence needs to be provided to justify this number.</p> <p><i>NOTE: This comment is without prejudice to other representations by the Town Council on Policy SP17.</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thattham Town Council is the principal representative body of the community and is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the development of Thattham, and particularly on the substantial deficit of infrastructure in the local area. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what is required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thattham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thattham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1672
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thattham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1672 Thatcham Town Council_Attachment 1 - Reg 18 webpage.jpeg PS1672 Thatcham Town Council_Attachment 2 - Reg 18 evidence webpage.jpeg
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Policy SP17 states:</p> <p>"The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals which have been positively responded to."</p> <p>As discussed in another representation by Thatcham Town Council, the word "will" has many different meanings, and is ambiguous. The sentence only carries any weight if it is intended as a requirement – if it is merely an aspiration, it has no weight. Therefore, the word 'will' in this sentence MUST be replaced by "must".</p> <p>This sentence therefore means that the Thatcham Strategic Growth Study is incorporated by reference into Policy SP17. The Council states:</p> <p>"The Thatcham Strategic Growth Study (TSGS) is a consultant's report commissioned by the Council. The Council has not formally part of the Regulation 19 consultation and only forms part of the supporting evidence to the Regulation 19 Consultation. It has not been approved by any member of the Council, nor, as far as we are aware, through delegated authority. This is demonstrated by the saved web pages for the Regulation 19 Consultation provided Attachments 1 and 2 to the Town Council's representations. <See attachments PS1672 Thatcham Town Council_Attachment 1 - Reg 18 webpage and PS1672 Thatcham Town Council_Attachment 2 - Reg 18 evidence webpage></p> <p>The Thatcham Strategic Growth Study is an integral part of the draft Local Plan through incorporation by reference into Policy SP17. It is not formally part of the Regulation 19 consultation. Policy SP17 therefore is not legally compliant with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012'. It therefore also does not comply with the requirements of the Local Plan Involvement.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Paragraph 16 of the NPPF (July 2021) states that: "Plans should: d) contain policies that are clearly written and unambiguous and a decision maker should react to development proposals".</p> <p>Policy SP17 states:</p> <p>"The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals which have been positively responded to."</p> <p>This sentence is totally unclear and ambiguous, for three reasons:</p> <ul style="list-style-type: none"> • There is no section of Thatcham Strategic Growth Study titled "Guiding Principles", and no section that could reasonably be interpreted as such. This study is effectively the set of ideas by one consultancy about one possible configuration for a development. • The Study was based on a development of 2500 dwellings, and it is totally unclear how it might be applied to a site which aspects would be different and which would be unchanged. • The phrase "positively responded to" is completely meaningless in planning terms. <p>As a result of this lack of clarity and ambiguities, a developer could claim that almost any proposed development meets the requirements in Policy SP17.</p> <p>Paragraph 6.63 of the supporting text to the policy contradicts paragraph 6.54:</p> <p>"6.54 In reviewing the vision for Thatcham as part of the LPR, and to best understand how to plan for growth in Thatcham, the Council commissioned masterplanning work (Thatcham Strategic Growth Study (TSGS) 2020)."</p> <p>"6.63 Further detailed work will be required to develop a coherent masterplan or development framework to take the site forward to be produced in collaboration with the community and other stakeholders".</p> <p>It therefore appears that West Berkshire Council believes that the Thatcham Strategic Growth Study is not coherent, and is not development forward. It is therefore unsound, because it does not comply with paragraph 16 of the NPPF.</p> <p>Paragraph 1.10 of the Thatcham Strategic Growth Study Stage 3 report mis-represents the involvement of Thatcham representatives' workshop". A limited number of places in this workshop were offered to the Town Council, with no advisory or participatory nature. Under the legislation governing Town and Parish Councils, individual Councillors can only 'represent' the community mandated by a Committee (there is no equivalent to the scheme of delegation for Principal Authorities). Therefore, the workshop were participating in an individual (albeit informed) capacity. The Councillors who attended did not agree with the workshop specified for the 'interactive masterplanning session'. The Town Council has requested that this be corrected, but this has not been done.</p> <p>Paragraph 6.59 of the draft Local Plan is therefore also misleading to claim that "community objectives which emerged from the workshop".</p> <p>The Town Council's representations to the Regulation 18 Consultation highlighted a number of errors and misleading information in the Strategic Growth Study – for example the incorrect assertion that "enhancement of a 3G pitch at Henwick Worthy would provide an additional 1ha of sports pitches towards the NE Thatcham total". In fact, the Henwick Worthy site is already fully utilised as an existing grass one.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>As proposed in another representation by Thatcham Town Council, the word "will" in the first paragraph of Policy SP17 should be "may".</p> <p>"The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site therefore proposals which have been positively responded to."</p> <p>In order to make the Local Plan review legally compliant, the Thatcham Strategic Growth Study needs to be reviewed and updated to reflect the 2500 dwellings, and the resulting 'guiding principles' then need to be incorporated into the draft Local Plan or a supplementary planning document. This needs to undergo public consultation in accordance with the Statement of Community Involvement.</p> <p>This cannot be achieved through modification at examination.</p> <p>It is clear that the Local Plan is therefore "not ready for independent examination". Therefore, in accordance with Section 238 of the Compulsory Purchase Act 2004, West Berkshire Council must not submit it to the Secretary of State for examination.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community and is the location of only new strategic site allocation in the draft Local Plan. The site for development is reliant on having adequate infrastructure. However, the re</p>

	<p>promised in the current Local Plan has not materialised, and would not be de policies in the draft Local Plan. The Town Council can provide local insight to t Thatcham, and particularly on the substantial deficit of infrastructure in the lo happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan i allocations are greater than could be addressed through 'main modifications'. If, is minded to consider recommending 'main modifications' to policy SP17 and r Policies, it would welcome the opportunity to provide its perspective on what r required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1677
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1677 Thatcham Town Council_Attachment 3_Siege Cross Landscape Statement of Case.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The evidence base for this Regulation 19 consultation includes a total of 33 Landscape Capacity Assessments prepared by Liz Allen EPLA on behalf of West Berkshire Council. The exception is the 'Landscape Capacity Assessment for Land North East of Thatcham', which was undertaken on behalf of David Lock Associates by Lloyd Jones Associates.</p> <p>The report states that David Lock Associates are "planning consultants appointed to West Berkshire Council". This is not the Thatcham Strategic Growth Study for the Council. However, it DOES NOT say that West Berkshire Council commissioned a Landscape Capacity Assessment, and we have reason to believe that it did neither.</p> <p>Paragraph 2.12 of the report includes a curious statement:</p> <p>"The project brief requires the visual sensitivity of the study site to be considered as a single tract of landscape, and not broken down into individual parcels of land."</p> <p>It is difficult to understand why this should be an explicit requirement of the study.</p> <p>David Lock Associates has a potential conflict of interest in relation to this study; it had already pre-determined its view on the site through undertaking the Thatcham Strategic Growth Study for 2,500 dwellings, which was funded by the proponents of the study. The Landscape Capacity Assessment not to be broken down into individual parcels of land masks the proportion of the site that is suitable for development and its capacity.</p> <p>Paragraph 1.12 of the report in the section 'Determination of Landscape Capacity within the Site' states:</p> <p>"Because the project brief requires the sensitivity of the study site to be assessed as a single tract of landscape, rather than broken down into sub-components, no attempt has been made to plot variability of landscape capacity within the study site boundary, and this variability is present and is a constraint that should inform design. It will be down to individual applicants to assess the capacity of the study site in relation to individual planning proposals, should the land be brought forward for development."</p> <p>The statement in the second sentence is true for West Berkshire Council as well as applicants.</p> <p>The conclusion of the report, given in paragraph 1.7, is:</p> <p>"Having followed the template methodology, and made judgements concerning landscape and visual sensitivity, and having considered the landscape value, this exercise has concluded that overall the study site THA20 has a Medium Capacity. This is defined as 'The landscape could accommodate areas of new development in some parts, providing it has regard to the setting and the character and sensitivity of adjacent landscape character areas. There are landscape and visual constraints and characteristics that must be retained and enhanced.'"</p> <p>This is obviously inadequate to assess whether the site does indeed have a capacity of 1,500 dwellings, or how they should be distributed. West Berkshire Council has commissioned studies of landscape capacity for a substantial part of this site in relation to the application for Siege Cross. The summary of Statement of Case of West Berkshire Council's expert witness on landscape capacity and constraints of development of this site, and is provided as Attachment 3. (see attached document PS1677 Thatcham Strategic Growth Study 3_Siege Cross Landscape Statement of Case)</p>

	This document is available online at: http://planning.westberks.gov.uk/rpp/showimage.asp?j=15/00296/OUTMAJ&inc
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	<p>West Berkshire Council needs to commission a Landscape Sensitivity and Capacity Assessment that provides enough landscape capacity across the site and its sub-components to inform a Landscape and Visual Impact Assessment (LVIA) of total capacity.</p> <p>The wording of Policy SP17 needs to be amended as follows:</p> <p>The LVIA will be informed by a Landscape Sensitivity and Capacity Assessment <u>that considers variability of landscape</u> Landscape Sensitivity Assessment (2021) of the site.</p> <p><i>(added text is underlined; deleted text is struck through)</i></p> <p>Until there has been a quantitative Landscape Capacity Assessment for the site, Policy SP17 should not specify a number of units.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thatcham Town Council is the principal representative body of the community in the area. The site of the Strategic Site Allocation is the location of only new strategic site allocation in the draft Local Plan. The site is intended for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the examination of the Strategic Site Allocation, and particularly on the substantial deficit of infrastructure in the local area. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to the Strategic Site Allocation are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related policies, it would welcome the opportunity to provide its perspective on what changes are required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	

Agent Organisation	
Comment ID	PS1716
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The Policies Map shows the open space between Sowerby Street and Tull Way (on the west side of Thatcham, to the garden centre) as being outside the Settlement Boundary and part of the 'proposed green gap' between Thatcham and "Thatcham W" of the paper 'Settlement Boundary Review (SBR) December 2022' shows the settlement boundary as

	In the Regulation 18 consultation, the Town Council proposed that the open space between Sowerby Street and Tull settlement boundary, and this was accepted by West Berkshire Council - Settlement Boundary Review Background responses (pdf page 115).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	The settlement boundary in the Settlement Boundary Review (SBR) December 2022, map "Thatcham W" needs to be updated as the area of open space between Tull Way and Sowerby Street is outside the settlement boundary.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thatcham Town Council is the principal representative body of the community and is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the examination of Thatcham, and particularly on the substantial deficit of infrastructure in the local area. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If the Council is minded to consider recommending 'main modifications' to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what is required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1708
Chapter / Policy / Appendix Number	Policy SP 17

Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1708&PS1861 Thatcham Town Council _Transport Assessment webpage.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>The Local Plan Review web page on the West Berkshire Council website for the evidence base of transport assessments states:</p> <p>“Transport is one of the key considerations to be assessed as part of the Local Plan Review (LPR) process. A Strategic Transport Assessment (STA) is being undertaken to run concurrently with the LPR process to determine the potential impacts of the emerging draft Local Plan and to identify and assess mitigation measures to address such impacts.”</p> <p>(https://westberks.gov.uk/transport-assessments retrieved 26/02/2023 - copied below < see attached document PS1708 Assessment webpage>)</p> <p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>“(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, and submit to the Secretary of State, the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme</p> <p>If the document “to determine the potential impacts of the emerging draft LPR” is “being undertaken to run concurrently with the LPR process, the evidence for the SA/SEA cannot have been available when the Sustainability Appraisal: Appendix 5 SA/SEA of the Local Plan was prepared.</p> <p>The SA/SEA Summary for Transport Policy in Table 59 Appendix 5 of the SA/SEA states:</p> <p>“The policy is likely to have a positive impact on all sustainability objectives as it seeks to promote and encourage the use of sustainable travel, such as walking, cycling and the use of public transport over car use. A number of indirectly positive environmental impacts have been identified, which relate to benefits that a reduction in car use would have that are not directly related to the policy. No significant negative impacts have been identified as a result of this policy.”</p> <p>It describes the ‘Overall effect’ as “Positive”. There is no basis for this conclusion, as the Strategic Transport Assessment (STA) is not yet completed.</p> <p>The proposal for approximately 1,500 homes at North East Thatcham will increase the overall level of traffic in and around the village. The Strategic Transport Model – Local Plan Forecasting Report concludes (paragraphs 5.4.1 and 5.4.2):</p> <p>“5.4.1 The analysis set out in this assessment indicates where small impacts may still occur as a result of Local Plan growth, however due to network constraints it will not necessarily be feasible to mitigate all such impacts.</p> <p>5.4.2. It is important to note, however, that the Local Plan impacts have been assessed against a Reference Case with no growth (the current adopted Local Plan) in housing and employment within West Berkshire, which is an unrealistic situation; the Local Plan is expected to deliver growth across the district, and the district is committed to deliver that growth.”</p> <p>Regulation 12 requires the EA/SEA to assess the plan as a whole, not policy-by-policy. It is therefore clear that the impact of the Local Plan in relation to transport is negative, even without taking into account the growth in housing and employment within West Berkshire. The draft Local Plan does not comply with the requirement of Paragraph 12(2)(b) of The Environmental Assessment of Plans and Programmes Regulations 2004.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	The SA/SEA needs to be reviewed in relation to transport after completion of the Strategic Transport Analysis.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<p>Thattham Town Council is the principal representative body of the community is the location of only new strategic site allocation in the draft Local Plan. The for development is reliant on having adequate infrastructure. However, the re promised in the current Local Plan has not materialised, and would not be de policies in the draft Local Plan. The Town Council can provide local insight to t Thattham, and particularly on the substantial deficit of infrastructure in the lo happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan i allocations are greater than could be addressed through 'main modifications'. If, is minded to consider recommending 'main modifications' to policy SP17 and r Policies, it would welcome the opportunity to provide its perspective on what r required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1864
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1862&PS1864 Thatcham Town Council_SA SEA comparison table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Sustainability Appraisal should be based on evidence, rather than speculation or supposition.</p> <p>Table 30 compares the SA/SEA a development of 2,500 homes (i.e. the proposal for the Regulation 18 consultation) proposal for the Regulation 19 consultation) for North East Thattham. It should therefore be based on the SP17 Policy Emerging Draft Local Plan for the Regulation 18 consultation and the Draft Local Plan for the Regulation 18 consultation.</p> <p>The table below compares the text of Table 30 with the corresponding parts of Policy SP17 in those two consultations.</p> <p>With the exception of secondary education, the version of Policy SP17 for 1,500 homes (i.e. Regulation 19) gives a greater impact in that impact than the version of Policy SP17 for 2,500 homes (i.e. Regulation 18).</p> <p>Nothing can be meaningfully inferred regarding provision of secondary education:</p> <ul style="list-style-type: none"> • The figure of 8FE appears to have been copied from the Thattham Strategic Growth Study, where it is given as 8FE from other unspecified developments in the Newbury/Thattham area. • The figure of 2.5FE is below the minimum viable size for a secondary school, so is undeliverable. <p>Thattham Town Council has provided detailed representations on many aspects of Policy SP17, including primary h and the provision of social infrastructure in the town.</p> <p><i>See attached document for Thattham Town Council comments on SA/SEA < PS1862&PS1864 Thattham Town Council</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	A review of Table 30 should be part of a wider review of the Sustainability Appraisal / Strategic Environmental Assessment for North East Thattham.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thattham Town Council is the principal representative body of the community and is the location of only new strategic site allocation in the draft Local Plan. The development for development is reliant on having adequate infrastructure. However, the infrastructure promised in the current Local Plan has not materialised, and would not be delivered by the policies in the draft Local Plan. The Town Council can provide local insight to the community of Thattham, and particularly on the substantial deficit of infrastructure in the town. We are happy to elaborate on its other concerns about the current proposals for the Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If the Review is minded to consider recommending 'main modifications' to policy SP17 and related Policies, it would welcome the opportunity to provide its perspective on what changes are required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	Yes

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1329
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Ambiguous use of the word 'will' and other ambiguities [Representation part of a wider rep for SP17] Paragraph 16 of the NPPF (July 2021) states that: “Plans should: d) contain policies that are clearly written and unambiguous so that the decision maker should react to development proposals”. The word “will” has many different meanings when it forms part of a modal verb, including: (i) To issue commands, to express intention or determination; (ii) To make requests, or invite; (iii) To wish, desire or want. Within the draft Local Plan, the word “will” is used with all three meanings. In some cases, the intended meaning is clear. This leads to considerable ambiguity, and the risk that the policy could be interpreted in the future in ways that are not intended or that the policy could be challenged through planning appeal. This ambiguity exists throughout the draft Local Plan, but the focus of my concern of is on policy SP17. The Policy refers to the “Thatcham Strategic Growth Study provides guiding principles for the delivery of the site”. This study is split into Past, Thatcham Present and Thatcham Future. Presumably, only the last of these is relevant to Policy SP17, so this is the intended meaning.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p></p>
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>It is necessary to replace the word “will”, where the intended meaning is a commitment or obligation. The two possible alternatives are “shall” and “must”. I have extensive experience in the development of technical standards in Technical Bodies of the European Telecommunications Standards Institute (ETSI). Its drafting rules specifically prohibit the use of the word ‘will’ in standards, and any document containing this word must be referred to the ETSI Secretariat to the Technical Body for amendment. The word used by ETSI for a requirement is “shall” – largely consistent with other languages. For the draft Local Plan, I prefer the use of “must”, as recommended in ‘The Office of Parliamentary Counsel: Drafting Standards’ (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892409/OPC_drafting_standards.pdf) (retrieved 12/02/2023) In addition to the changes proposed in the representation by Thatcham Town Council, I would change the two instances of “will” to “must”, to make it clear that this provision carries the same weight as the other requirements in the Policy. Policy SP17 North East Thatcham Strategic Site Allocation Land as shown on the Policies Map is allocated for a sustainable low carbon, urban extension comprising of distinct neighbourhoods, which are well served by public transport, and connected and contributing to Thatcham, and woven through with natural habitats and links. The site is to be delivered as a whole to achieve a comprehensive development. The provision of all infrastructure, services, open spaces and co-ordinated. The Thatcham Strategic Growth Study Stage 3 Report Thatcham Future provides guiding principles for the development. All proposals <u>must</u> will demonstrate that these guiding principles have been positively responded to. [NOTE: I do not understand how “positively responded to” would be interpreted in planning policy terms, especially as the Study was for 2500 houses] Homes The site is to be allocated for approximately 1,500 dwellings which <u>are expected to will</u> be completed within the period of the plan. The dwellings <u>must</u> will comprise of a housing mix which complies with the housing mix contained in Table 3 of Policy SP18. In addition to the following: • 40% of dwellings <u>must</u> will be affordable housing; and • 3% of dwellings <u>must</u> will be delivered via serviced custom/self-build plots. Community The site <u>must</u> will provide: • Local centres providing local retail facilities and small-scale employment for community use (approximately 1,100 sq m)</p>

- 450 sq. metres GP Surgery to be offered to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care body;
- Early years provision;
- A 2.5 FE primary school on site and sports infrastructure requirements of the school, land to be provided and built;
- Secondary provision - Land to meet the impact of the development. The nature and cost of the mitigation must will be undertaken at the applicants expense and prepared in collaboration with the Council and local stakeholders;
- 1,200 sq m community indoor facility to be used for sport and community uses with a variety of room sizes (current);
- Outdoor formal and informal sports pitches and areas to meet the identified need of the development;
- Open space to meet the needs of the development in accordance with Policy DM41;

Green Infrastructure

The site must will provide a comprehensive green infrastructure network which will take advantage of the landscape features of the site. This network will comprise:

- A new community park linking Thattham to the North Wessex Downs AONB;
- Greenways which connect through the site to the park, facilitate connection to the AONB, and include leisure routes;
- A comprehensive network of other accessible routes and connections within the development which provide walking routes;
- Existing and new Public Rights of Way; and
- Retained and new trees, hedgerows and other appropriate native planting which contribute to biodiversity net gain.

Transport

Measures must will be included to improve accessibility by, and encourage use of, non-motorised transport modes. A detailed plan will provide detail on how this will be achieved, including:

- Active travel improvements on routes between the site, Thattham town centre and the railway station;
- A vehicular through route;
- Sustainable transport through routes;
- Mitigation of the development's impacts on the highways network with improvements to existing junctions where the development provides access points for all forms of movement and transport to the site at locations to be agreed with the planning authority;
- How adverse impacts on air quality will be minimised.

Sustainability

Development of the site must will be in accordance with supported by a Sustainability Charter which will establish how sustainability will be achieved. This will be informed by:

• An Energy Strategy which must sets out measures to achieve a model low carbon development (following the energy efficiency policies SP5 and DM4, including:

- net zero carbon (regulated and unregulated energy) emissions for dwellings;
- BREEAM 'excellent' non residential buildings;
- on-site renewable energy to assist in the delivery of a net zero carbon neutral development; and
- carbon off-setting.

• An Integrated Water Supply and Drainage Strategy which must will set out:

- measures to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both surface and groundwater;
- surface water management approaches that could deliver net gain for Thattham town, including use of on-site sustainable drainage systems.

• An Ecology Strategy which must will set out:

- a Biodiversity Net Gain Strategy to show how net gain will be achieved including through habitat creation, restoration and linkages;
- how priority habitats and ecological features will be protected and enhanced;
- the creation of new ecological features; and
- a site-wide management plan.

• A Green Infrastructure Strategy which must will show how a network of multifunctional green infrastructure will be provided.

• A Public Rights of Way Strategy which must to demonstrate how existing Public Rights of Way will be protected and new ones will be established, including bridleway links and safe crossing points.

• A Lighting Strategy which must will include consideration of dark skies, particularly in relation to the nearby North Wessex Downs AONB to mitigate the impact on biodiversity.

• A Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape Assessment 3rd ed. 2013. This will inform the final capacity, development, design and layout of the site and requirements for green infrastructure and public open space. The LVIA will be informed by the Landscape Sensitivity Assessment (2021) of the site.

• A Mineral Resource Assessment (MRA).

• A Historic Environment Strategy which must to demonstrate how the listed buildings in the area will be conserved and their settings has been considered.

A Construction and Operations Management Plan (COMP) shall must accompany any planning application on the site and the oil pipeline from operational works, including the provision of an appropriate buffer.

[NOTE: This final paragraph should not be a sub-bullet of Sustainability]

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan

Yes

If it would assist the examination.

Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1337
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Level Crossing [Representation part of a wider rep for SP17]</p> <p>As a resident of Thatcham, the location in the town where I experience the most serious congestion is the level crossing. The queue can build to more than half an hour in duration, when there is an unfortunate combination of train movements. This is unacceptable, and any increase in delays is completely unacceptable.</p> <p>The WSP study does not build this into its model. The West Berkshire Local Plan Review Phase 2 Transport Assessment states "the model also indicates that these queues clear when the level crossing gates are open", which is an obvious but incorrect assumption.</p> <p>It is clear that any increase in housing in Thatcham will result in a corresponding increase in traffic over the level crossing. The houses are located at the east of the town.</p> <p>The increase in population and Government policies to encourage travel by public transport are likely to increase the number of trains using the station. This will increase the delays, because the level crossing barriers need to be down for longer for a train to pass at speed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>The future Strategic Transport Assessment should take into account the delays due to the level crossing at Thatcham. Any necessary changes for this should be carried out. The results of the Strategic Transport Assessment should then be considered in the Strategic Environmental Assessment (SA/SEA), prior to the submission of the draft Local Plan.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	If it would assist the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1341
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	S Pike Attachment 3 - Supplement Q and A12012023 Executive.pdf S Pike Attachment 6 - Area_Delivery_Plan_Policy_3_-_Thatcham.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The regeneration of Thatcham Town Centre and the provision of social infrastructure in the town are recognised as in economic and social impacts are greater than the criterion of 'significant' in the Government Guidance "Strategic environmental sustainability appraisal". These should therefore have been considered specifically in the Sustainability Appraisal.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>[SP17 - Deficit of Social Infrastructure for Thattham. Representation part of a wider rep for SP17] [See attached documents Attachment 3 and 6]</p> <p>The current Local Plan states in the introduction to Policy Area Delivery Plan Policy 3: “Thattham town centre will be a focus for regeneration, enabling the town to fulfil its role within the District’s Hierarchy of Centres, serving the local population, not only within Thattham, but also the surrounding rural areas. The provision of leisure and community facilities for all ages will be improved and enhanced retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages will be improved and enhanced retail offer and enhancing the streetscape.”</p> <p>The policy itself includes the following objectives:</p> <ul style="list-style-type: none"> • Thattham’s services and facilities will be improved allowing the town to fulfil its role within the District Settlement Hierarchy of Centres, serving the local population, not only within Thattham, but also the surrounding rural areas. • The town centre will be regenerated with the redevelopment of the Kingsland Centre driving this improvement, providing a high quality environment and enhanced retail offer. This redevelopment is proposed to deliver approximately 17,200 sq.m of new space including, among others, retail, residential, office and community space. • The streetscape and public realm throughout the town will be improved, along with upgrades to the A4/Bath Road and Bath Road, enhancing Thattham’s image. • The range of leisure facilities within Thattham will be expanded, utilising those at the existing Newbury Leisure Park and providing opportunities for leisure within the town centre through any future regeneration projects. <p>The Infrastructure Delivery Schedule (2013) includes the following:</p> <ul style="list-style-type: none"> • A new library is ‘necessary’ as ‘Library needs to be about 900 sq.m larger than current provision’, at a cost of £3,700,000. <p>However, none of this regeneration has materialised, no new developments have materialised, and the Newbury Leisure Park Area Delivery Plan Policy 3 from the current Local Plan is provided as Attachment 6 to these representations.</p> <p>The draft Local Plan states:</p> <p>6.52 Thattham has experienced rapid population growth during the post-war period, expanding more than 5 times since 1951, accompanied by infrastructure growth in transport, and a considerable expansion in the built-up area to match the population growth. Recent decades, the provision of social infrastructure has not kept pace with housing growth.</p> <p>6.53 The vision for Thattham contained in the Core Strategy DPD (2012) was that Thattham town centre would be a focus for regeneration, enabling the town to fulfil its role within the District’s Hierarchy of Centres by improving the retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages would be improved and encouraged within the town centre. The town would be provided with a range of job opportunities and encouraging residents to shop and socialise locally.</p> <p>In the January 2023 Infrastructure Delivery Plan, the new library has been replaced by ‘A new library / community hub’ with no indication on when this might materialise. The only other significant proposed infrastructure developments for Thattham are for the North East Thattham development.</p> <p>During the current plan period, the town will have grown by several hundred dwellings due to non-strategic development. The ‘regeneration’ has materialised, and if anything has degenerated – the Kingsland Centre has not been redeveloped, the library has been closed, and the library might benefit from a disabled toilet. There have been no other significant compensating enhancements.</p> <p>Attachment 3 to this response contains the formal answers to questions that I submitted to the meeting of the Executive on 12th January 2023 – see Item (A) on page 3 and Item (H) on page 8 (the question on page 6 is not relevant to the local plan). These questions confirm that there has been no major investment in infrastructure for Thattham in recent years. Much of the money spent was for refurbishment, rather than regeneration. The answer to Item (H) also indicates that the Council does not intend any expansion of the Newbury Leisure Park (Covid-related grants are irrelevant, because they were for the purpose of providing improvements).</p> <p>The premise of Policy SP17 that Thattham is able ‘to fulfil its role within the District’s Hierarchy of Centres’ is fundamental to the Local Plan. Policy SP17 and its assessment in Appendix 4 of the Sustainability Appraisal either incorrectly assess or ignore the need for social infrastructure in Thattham, and therefore cannot have assessed ‘the area’s objectively assessed need’. Policy SP17 is not justified. Policy SP17 also cannot be based on proportionate evidence, and is therefore not Justified.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>There needs to be a clear policy for the regeneration of Thattham, and in particular its social infrastructure. This need must be completed in advance of any further housing development or at specified stages of construction. This could be done through Policy SP17 or a separate policy.</p> <p>The Infrastructure Delivery Plan is not sufficiently robust for this purpose. It is described as a ‘living document’, and the fact that it includes can ‘die’ at the discretion of the Council without any need for public consultation.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Duncan, Stuart
Consultee Full Name	Stuart Duncan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1592
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>I have read the representations made by Bucklebury Parish Council and agree with their objections to the Regulation 19 version of the LPR.</p> <p>There are clearly significant flaws in the Regulation 19 version of the LPR. West Berkshire District Council (WBC) should have examined the document more thoroughly before it is submitted for examination.</p> <p>I have referred to some, but not all, of these flaws below:</p> <p>1. Timing of Consultation</p> <p>The Housing Delivery Test results published in January 2022 show that West Berkshire Council (WBC) provided 117% of the preceding three years. Closer examination shows a more significant oversupply in the last year. This could mean that some of the sites such as North East Thatcham are unnecessary.</p> <p>The LPR is based on outdated ONS projections and a flawed methodology for deriving the appropriate housing target. The LPR is based on a plan-led system where the amount of housing which must be planned for within any local plan is likely to be significantly higher than the figure in the LPR.</p> <p>Other local authorities have chosen to pause further progress on local plans until recent changes to planning policy are better understood. This is at odds with WBC's approach.</p> <p>The LPR is not ready for examination, which contravenes Section 20 b) of the Planning and Compulsory Purchase Act 2004.</p> <p>3. Site Selection Process</p> <p>There is little evidence of a rigorous process being undertaken in the Site Selection Methodology Paper. Thatcham Town Council was not adequately consulted.</p> <p>The LPR contains very limited information regarding AWE Aldermaston and AWE Burghfield. There is a lack of consultation with the residents of AWE Aldermaston and AWE Burghfield in the preparation of the LPR. The Site Selection Background Paper (Reg18 SSBP) refers to Site THA9 and raises concerns that this development would create a strategic gap between Thatcham and Newbury. The same concerns are not expressed in relation to Site THA20 (2,500 houses) development. This makes no sense. The analysis is inconsistent. The strategic gap is of fundamental importance between Thatcham village (i.e. Thatcham and Upper Bucklebury) and Newbury.</p> <p>The proposed development would destroy the separate identity of each settlement and jeopardise the remote nature of the settlements.</p> <p>The proposal is at odds with WBC's own objections to the Siege Cross plans in 2015/16 (500 houses) - 15/00296/OU. WBC's own expert in that case was categorical in the assessment of the damage that Siege Cross would cause to the local environment. This was repeated throughout WBC's vigorous opposition to the site. Siege Cross now forms part of the THA20 proposal. The THA20 is 10 times the size and much closer to the AONB. The potential damage would be significantly greater.</p> <p>There are also flaws in the Thatcham Growth Study (TGS), particularly in relation to the site selection process.</p> <p>4. Sustainability Appraisal</p> <p>BPC has prepared an analysis against the Sustainability Appraisal (SA) objectives (Appendix 2 of its representation). The conclusions are not based on any accurate or available evidence. An accurate or reasonable assessment leads to the conclusion that all SA objectives. WBC's approach to the assessment and scoring of the site against the SA objectives is severely flawed.</p> <p>5. North East Thatcham Strategic Allocation</p>

Masterplanning is yet to take place and there is no vision for how the homes will be accommodated on the site, especially as access is compromised by the pipeline.

There is no detail on the infrastructure or other facilities. The infrastructure has not been costed adequately and therefore the site is deliverable.

The school provision has not been costed within the viability appraisal and therefore the deliverability of this element is uncertain.

There are no details or costings provided for the proposed 1,200 sq m community indoor facility

It is unclear how the proposed outdoor formal and informal sports pitches will be provided when most of the site is occupied by the pipeline.

Given the gradient and level change across the site, it is not considered that a comprehensive network of cycle paths can be delivered.

Links and access to the AONB are being encouraged without consideration of the sensitivity of the common and wider landscape.

The evidence base for trip rates and trip distribution is highly flawed and mitigation measures will not be successful.

The highway network in the vicinity of North East Thatcham is already over capacity and development of this scale would breach the threshold set out in paragraph 111 of the NPPF.

It is highly unlikely that the dwellings will be brought forward as net zero carbon and no allowance has been made for this in the viability appraisal for the site.

It is unclear how any development on this site would deliver a 'net gain' for Thatcham Town in terms of drainage and flood risk within the viability report for the site.

Given the highly sensitive location of the site it is illogical that a Landscape and Visual Impact Assessment has not been undertaken for the proposed allocation.

Consideration of heritage impact should have been undertaken as part of the site selection process and subsequent appraisal. It is not considered appropriate that this is left to later stages of the planning application process.

Given the significant ambiguity over the position of the impact of the oil pipeline it is unclear whether the site would be considered developable as set out in the glossary of the NPPF. Given that WBC are acutely aware of these constraints it is illogical that no assessment has been undertaken.

6. Landscape and Character Impact

There is no evidence to support claims that SP17 will have a positive impact on the environment. By contrast, there is evidence to suggest that it will have a significantly negative impact.

The North Wessex Downs AONB statement on development in the setting of the AONB states that *'examples of adverse impacts on the AONB include: development which would have a significant visual impact on views in or out of the AONB, particularly when this is associated with developments that have a vertical emphasis and / or movement (chimneys, pylons, etc); loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impacts; loss of tranquillity through the introduction of abrupt change of landscape character; loss of biodiversity, particularly of species of importance to the AONB; loss of features of historic and natural landscape interest, particularly if these are contiguous with the AONB; loss of tranquillity through development individually or cumulatively giving rise to significant impacts on the AONB; and from the AONB, resulting in loss of tranquillity and erosion of the character of rural roads and lanes. Increase in the number of vehicles on the roads in the AONB.'*

The development of North East Thatcham would give rise to all of these adverse impacts to some degree or another.

The Landscape Character Assessment is now more than 20 years old so can be considered as up-to-date in accordance with the NPPF.

The Thatcham Strategic Growth Study (TSGS) offers little assessment of the damage the proposed THA20 site would cause to the AONB, acknowledging that the AONB partnership has objected to it, and that there is "little intervisibility between the two if any proposals." This does not adequately assess the effect the development would have on the AONB.

WBC is aware of the negative impact on the AONB. The Site Selection Background Paper December 2020 Table 8.2 states that "in developing THA20 WBC is accepting that the separate identity of Bucklebury would be lost and there would be defining impacts on the AONB."

The proposal would have a direct and irretrievable negative impact on the AONB. WBC are charged to protect the AONB and the positioning of THA20 as a viable site.

The AONB board has objected to the concept of a country park in close proximity to the AONB, as it will encourage development in the area (with the potential to cause further harm to the wider areas).

7. Ecology and Biodiversity Impact

The proposed site is in the setting of the AONB and, as such, the development of the land would not protect nor enhance the AONB.

The development of this site would have a significant impact on the character and beauty of Thatcham and Bucklebury.

There is no evidence that the impact of the development on biodiversity or the provision of net gains for biodiversity has been assessed. Instead, this is being left to the application stage. This is considered too late and runs contrary to the approach set out in the NPPF.

There is no evidence of the impact of the site insofar as it may contribute to, put at unacceptable risk or adversely affect the AONB through air, water or noise pollution or land instability. This appears to contravene the NPPF approach, which says that development should help to improve local environmental conditions such as air and water quality, taking into account relevant information from the local planning authority's plans.

WBC has not embedded biodiversity as part of its plan and has instead chosen to leave this to the application stage.

WBC has not planned for biodiversity and geodiversity in line with the Planning Practice Guidance, specifically paragraph 8-010-20190721, Revision date: 21 07 2019.

It is a key part of the Bucklebury vision for the Common not to increase the number of visitors, but to place the emphasis on giving the Common a chance to restore itself and thrive, both in terms of the diversity and abundance of its fragile ecosystem. Based on the LPR, the proposed development represents an additional 4000+ people being actively encouraged into the AONB, with the loss of habitats found in Bucklebury Common, with its ancient woodlands and heaths, pastures, greens and historic ponds. The development is intended to balance accessibility and leisure usage with the needs of the environment, with increased usage from cyclists and walkers, and ground-nesting birds, notably woodcock, and other wildlife.

The land immediately adjacent to the proposed development area for SP17 contains 41 Local Wildlife Sites and is part of the Bucklebury Biodiversity Opportunity Area.

The data being used to establish the presence of species is out of date. In 2020, Bucklebury Parish sought environmental impact assessment for the area impacted by SP17:

- 80% of surveys were conducted more than 15 years ago
- 50% were more than 20 years old
- 44% were over 30 years old

BPC has appointed ecologists to conduct an independent study of the impacted area. The findings from a single day survey indicated that the site had a much higher biodiversity value than previously appreciated, including the presence of several bird species, including several species of birds and one threatened migratory species, several bat species and abundant badger setts. The hedges, old trees and hedgerows provide corridors linking up different habitats within and beyond the site boundaries. These initial findings imply that a full study of the site and the measures and BNG will be far more complex for the development than was anticipated by the planners. This one study provides more information about the site than has been presented in the whole the LPR and its available evidence base. The area has a much higher biodiversity value than assessed by WBC.

Protected species are present across the site and would be impacted. No detail on mitigation measures has been provided. Protected network features are under threat from the development and will severely impact distribution of key species.

8. Highway Impact

YES Engineering Group Limited was appointed by Bucklebury Parish Council to review the transport related evidence. The review indicates there would be delays and congestion occurring around key junctions along the A4 corridor, with through traffic being diverted to other routes.

Journey time analysis was carried out and assessed the most desirable routes for those travelling east (towards Reading). It was demonstrated that the quickest route in each direction is via Harts Hill Road or via Cold Ash Lane rather than via the A4. The impact on these routes has not been assessed and this is a fundamental flaw within the modelling assessment.

The selection of North East Thatcham for significant development is fundamentally wrong as traffic will need to divert to other routes. Non-highway based mitigation measures are almost impossible to achieve due to its location/topography.

Development at North East Thatcham is likely to cause displacement onto wider routes away from the A4, through local roads in Bucklebury. The WBC Phase 1 Transport Assessment describes these routes as undesirable and, critically, the impact on these routes. Any of the evidence presented in support of the emerging local plan. Additionally, there are fundamental flaws within the assessment.

In summary:

- The trip rates set out by WBC are unreliable and not robust.
- The trip distribution is unrealistic (all evidence suggests traffic will be diverted from the A4).
- The proposed mitigation measures suggested by WBC are improbable at best.
- The location of site means car traffic will dominate the area.
- The Highway network in the vicinity of THA20 is already over capacity.
- No assessment has been made of the routes most likely to be affected by an increase in traffic. Increase in traffic through the area will create safety issues.

9. Heritage Impact

WBC does not appear to have taken into account the setting or significance of Colthrop Manor as a designated heritage asset. The location of East Thatcham or considered the impact of the development or the way in which the capacity of the site would be affected.

10. Infrastructure and Services

There are significant failings with the LPR on whether the provision of infrastructure associated with the development under policy SP17 is viable or deliverable.

The North-East Thatcham development plan (SP17) proposes a 450 sq m primary healthcare facility with the suggestion that it be provided to the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board or other such appropriate body. However, there is no detail or insight into strategic healthcare planning.

Few new GP practices are commissioned by NHS England, even where they consider there to be patient demand for them. The figures of patients registered in the NHS Berkshire West Clinical Commissioning Group (CCG) confirm there is an ever increasing demand in areas of the country. There is therefore no realistic prospect of a new GP practice being established in Thatcham or the surrounding area in the future. There has been no approach by WBC or the developers to any local GP practice to discuss an appropriate site for a new practice or one or more practices could relocate. All three existing practices are already overstretched.

Thatcham dental practices are unable to provide dental care for the whole population with a significant minority of patients unable to access dental care for NHS and private dental care. Thatcham Vision, endorsed by WBC in 2016, confirmed only 60% of residents have access to a dentist (with 17.5% registered with a doctor outside Thatcham). There is no evidence provided that either WBC or the developers have consulted any local dental practices regarding the potential impact of increased workload resulting from additional housing.

The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR. There is no end-to-end plan, which appears to breach the obligations of WBC to provide education facilities for children.

The lack of effective or justified education provision across the various proposed developments also means it is impossible to assess the impact on traffic.

The location of a secondary school in the North East Thatcham development under policy SP17 would inevitably result in increased traffic across the whole Thatcham area and this has not been adequately considered in the traffic plans and modelling in the LPR.

There are no details in the LPR of the provision for Nursery or Early Years education. SP17 merely states that the site should be suitable for such provision.

The provision for primary school education is unclear and contradictory. There is no data or evidence on the planned provision of primary school education. The LPR proposes that the sum of £12 million will be sourced from the developers of SP17 to fund the provision of primary school education. However, with no recent data available (the only data referenced is from 2011), it is impossible to assess if this funding will be sufficient for the delivery of the required education provision.

The plan for secondary school provision is unsound for the following reasons:

- There is no satisfactory evidence of the number of pupils the school is to cater for
- The location of a school within the proposed development is not clear
- The number of Form Entries is not defined, but it is noted that anything less than a 6FE school is unsustainable.

	<ul style="list-style-type: none"> • The timing and responsibility for the funding is not clear and has not been adequately costed in the viability appraisal. • There is no evidence that the proposed funding is sufficient to meet the Council's obligations to provide education. <p>11. Climate Change and Flood Risk</p> <p>The Sustainability Appraisal is ambiguous in relation to flood risk. It states that the development at North East Thatcham has a positive impact but there is also a '?' place in the assessment box. The justification for the assessment given by WBC for consideration of SuDS that could deliver net gains for Thatcham, but there is no other reference made to flood risk. The assessment for GI, ecology and sustainability measures to be included which may all have a positive impact on flood risk. It is not clear from the assessment, and the question mark demonstrates that WBC are unsure of the impacts in this regard. It is not considered effective or consistent with national policy and is unsound on this basis alone.</p> <p>12. Water Supply and Foul Drainage</p> <p>Flood risk is a significant threat to Thatcham, and lack of evidence to suggest this has been adequately considered.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>2. Consultation and Duty to Co-operate</p> <p>WBC announced the Regulation 19 consultation on 20th January 2023. Interested parties were then notified that the website would be unavailable on 21st and 22nd January due planned maintenance of the website. It was unclear whether any review of the LPR evidence could not begin until 23rd January 2023. This effectively shorted the consultation period to the required 6-week period.</p> <p>WBC did not properly consult Bucklebury Parish Council (BPC) in the first instance when carrying out the Settlement Review and their representations.</p>
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bailey, Elizabeth
Consultee Full Name	Elizabeth Bailey
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1349
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:35:00
Attached Files	PS1349 Elizabeth Bailey - photo1.jpg PS1349 Elizabeth Bailey - photo2.jpg PS1349 Elizabeth Bailey - photo3.jpg PS1349 Elizabeth Bailey - photo4.jpg
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<ul style="list-style-type: none"> • It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury. • The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham. • It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and if this scale are approved there will not be any open rural areas left for future generations to enjoy. • The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain. • The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven. • According to the Transport Assessment paragraph 3.26, 'The access arrangements for the Northern end of the junctions on both Floral Way and Harts Hill Road. Results from the modelling suggest that these will not cause

modelling results for this so I am unsure as to why this has been stated. Please can you share these with me? H and pollution on an already dangerous and busy road (without the development), be seen as not causing a pro

- I have been made aware that there are drawings showing a new car park on Harts Hill. This again will increase tr road and is highly likely to promote anti-social behaviour, illegal activities, fly tipping and littering which we see
- In terms of 'reducing accidents and improving safety' your assessment has concluded that 'the policy is likely to safety as safe travel will be critical to the design of the site'. Also regarding 'increasing opportunities for walking, your assessment concluded 'the policy is likely to have a significant positive impact on walking, cycling and pul should be designed with these in mind'. I wholeheartedly disagree with both of these assessments and I have such as 'likely'. Please can you provide me with the evidence and conclusions for both these assessments? Al more importantly about the surrounding areas, villages and community which exist today and have done for ye done to assure road safety for these with the increased traffic?
- Further to the above, this development will have a significant impact on traffic levels and the associated pollutio increasing:
 - Traffic from Thattham through Upper Bucklebury to Chapel Row on roads which are not designed for larg
 - Traffic on the route from Thattham and Newbury. These roads approaching the station are already heavil the event of any minor traffic disruption
 - Increased traffic through ALL the surrounding villages in general, especially as there is a plan for an exit Hill. This will significantly increase traffic towards Upper Bucklebury, Chapel Row, Bradfield, Cold Ash and 'some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury'. This is a total unders any concern for road safety, especially as the roads are already inadequate, have no pavements and are ex traffic. The potential for serious/fatal accidents is already high and this proposed housing development an
 - Traffic and speeding up to and through Upper Bucklebury
- This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and v overstretched.
- Regarding healthcare, there is a significant lack of detail around strategic healthcare planning and the NE That aware, neither WBC or the developers have arranged or published a prospective Health Impact Assessment fo also been no engagement between the North-East Thattham Development Consortium and local general practi The unlikelihood of a new GP site being available will result in the three existing practises in the area being ove the developers have not provided evidence for the provision of a viable primary care medical facility. To add to are already unable to provide dental care for the local population, this will also get worse with the proposed de
- Regarding the environment, there will be damage to the Bucklebury Plateau Biodiversity Opportunity Area and the common. This development will also destroy the enjoyment of the local countryside by local communities in te Downs AONB and will cause negative impact to legally protected wildlife. There is no evidence to support claims will have a positive impact on the environment but instead it will have a significant and serious negative impact protected wildlife, natural vegetation and sustainability. Environmental sustainability is defined as: 'the ability to in our planet's natural environment and conserve natural resources to support the wellbeing of current and future shocked and disappointed that WBC is not protecting the sustainability of our precious environment. In addition significant attempt to investigate, analyse and address the negative environmental consequences. Why not?
- Regarding education, within the Local Plan Review the provision for Nursery, Early Years, Infant and Secondary been clearly defined. The provision for Primary and Secondary school education is unclear and contradictory. V has a duty to make arrangements for suitable school provision. How this obligation will be met across all schoo evidenced in the LPR. The plan for the schools needs to take priority and should be confirmed before any housi this is done it is likely that houses will be built and no additional school provision will provided, leading to overs ineffective education for our children. The LPR talks of provision of school fields however no evidence for fundi field near the busy, congested and air polluted A4 does not suffice as suitable) has been identified by the WBC Consortium.
- There is no evidence that this development will enhance Thattham town centre (or the area in general).
- It is not likely to attract new businesses to the area or create or significantly increase employment.
- The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new developme
- There is now particular focus within the Consultation National Planning Policy Framework on taking into accou assessing how much housing can be accommodated. As a result of this, several local authorities have paused they await the outcome of the consultation on the basis that a lower housing requirement could be applicable t being planned for. Although I am completely against the NE Thattham housing development, I would ask that (as others have), to hold on the plan and present a revised plan in line with the updated planning guidance wh

To conclude, this development is unnecessary, inappropriate, and ill-conceived and should be rejected.

Please do not take the opportunity to live and play in our beautiful countryside away from those that currently cherish and the feeling of community that this area offered to all.

We as a community should not have what was inflicted on Shinshield near Reading happen to us here. As anyone t more was lost by the masses of houses being erected than gained by the local community.

Observations

- Why is WBC not writing to **all** residents to make them aware of this development and obtain /seek comments o audience as this development will effect?
- Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between That consideration of this approval now certainly seems to totally contradict this stated commitment.
- Why is WBC are now considering this development when a previous application was rejected by the secretary

I am prepared to appear at the public enquiry, if invited.

Please see PS1349 Elizabeth Bailey - photos as attached with the representation

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

- * Yes
- * No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I am prepared to appear at the public enquiry, if invited.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Atkins, James
Consultee Full Name	James Atkins
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1374
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Please find below my objection to the proposed NE Thatcham development and my concerns about the planning document.</p> <p>Healthcare and education</p> <ul style="list-style-type: none"> • 2500 extra houses will need healthcare, the plans state this will be provided with a new primary care facility however, as major surgeries are rarely ever approved by NHS England, there is a current staffing crisis in the NHS which will make it difficult to establish before any development could go ahead to maintain safety of new and existing residents. These concerns should be taken into regard. • Education facilities have also not been properly outlined in this document. There is no detail as to how/where/viability of funding for the new development. There are contradictions in the document such as stating that funding will be partially covered by a new school, but then stating that the development is not big enough to justify a new secondary school. This is again a concern. <p>Traffic:</p> <ul style="list-style-type: none"> • Current road conditions are unable to cope with existing traffic burden (poor road maintenance, potholes, serious accidents with higher traffic burden) • Many roads don't have pavements but are quiet enough for this to not be a problem, increased traffic trying to get through to the A4 will render this a disaster for pedestrian/cyclist safety • Why is there an additional car park on Harts hill road? No clear use set out for this in the document. This is a high speed road and this will worsen the problem. Also concerned about encouraging antisocial behaviour as this is already an issue in the area. • No detail about how walking/cycling/public transport will be improved in this planning document. How will this be funded? The current document just proposes increased risks to walkers and cyclists from higher road traffic but does not outline how these risks are going to be mitigated without outlining how. <p>Environmental</p> <ul style="list-style-type: none"> • Bucklebury common is an ecologically diverse site and the addition of 4000 extra people into the area can only have a negative impact on the site. • The document clearly states that your own analysis shows this development will have a negative impact on sustainable development of the site. • There are no clear plans on how environmental impacts will be mitigated, just vague statements that they will be. • The location of this proposed development will turn Upper Bucklebury from a small village into the outskirts of a town which will undeniably change the ambiance and character of the village. This is likely to result in residents who have lived in the area, and taking with them their investments in the local community and infrastructure. The size of this development is a concern. <p>General</p> <ul style="list-style-type: none"> • The recent change in governmental view on housing provision from a mandatory number of properties to an advisory number is a concern. They also state that the Planning Inspectorate should not override sensible local decision making simply to meet a target. WBC not taking the opportunity to pause the planning process while awaiting the outcome of the revised plan is a concern. This year rather than pushing forward with a clearly unsound and damaging development of far too many properties.

	I object to the proposed development for the reasons outlined above as I feel the planning is unsound and the risks h and mitigated.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Foulkes, Alexander
Consultee Full Name	Alexander Foulkes
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1390
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to voice my objection to, and grave concerns regarding, the Council's proposal to build up to 2500 new houses on green belt fields to the north east of Thatcham. This would represent a very large increase in the population of Thatcham and surrounding area on the wider area, much of which remains deeply rural (and much of which to the north is protected by the AONB for its natural beauty).</p> <p>We moved as a family with small children to the Thatcham area from a more heavily developed suburban area precisely because we wanted to get away from crowded schools and roads and for the fresh rural air. The proposal to house an extra 10,000 people, representing an increase of over 30% in local population of Thatcham and surrounding area is unbelievable.</p> <p>How are so many additional people going to get to work? The A4 is single carriageway and the roads along the side are narrow and smaller. There is no way they could cope with an extra 2,500 commutes and school runs, and the "increased use of public transport? The train services are on their knees and buses even worse.</p> <p>Where are these extra 10,000 people going to register with GPs? I work on the frontline in healthcare myself and see how busy and overcrowded our healthcare service are. Without huge increased capacity an increase in the local population of Thatcham and surrounding area will collapse our local services.</p> <p>Local schools are also at capacity yet the Council plans for where an extra 5,000 children might go to school seem to be "on paper" with no concrete strategy for schooling within this plan.</p> <p>The local environment and Bucklebury Common are ecology unique, including Ancient Woodkand, and loved by visitors. The environmental impact of an extra 10,000 people less than a mile away does not seem to have been given much consideration. The council's with wildly optimistic claims that the impact can be minimised, without an concrete evidence of how this can possibly be achieved. The loss of green belt fields in a rural area, rather than looking for dispersed brownfield sites, seems like environmentally unjustified.</p>

	While I understand the need for more housing in West Berkshire, for the Council to focus such a huge increase in a without consideration of local schools, medical services or transport is completely unjustifiable and would have a gra wellbeing, services and the character of the area.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If necessary I would attend a public hearing if necessary (so long as the timing of attendance did not impact on my p
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Slatford, Amy
Consultee Full Name	Amy Slatford
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1503
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:48:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I object as the plan is unsound because:</p> <ol style="list-style-type: none"> 1 Traffic. There will be a significant, and potentially dangerous, increase in the traffic on the rural roads through E an exit from the site onto Harts Hill, but no wider traffic modelling is available. WBC assesses that there will be the rural roads, but this will have a positive impact on road safety. Given the nature of these roads it is hard to flow through local villages with a positive safety impact. Traffic flows over areas such as the Thatcham level cr the A4, and to the M4 and A34 will just cause gridlock and unmitigated pollution in all areas. The plan falls dramatically short in this area. 2 Healthcare. There is no detail into strategic healthcare planning included in the proposal. Given the developme should include a Health Impact Assessment (HIA), but this does not appear to have been completed. There is being commissioned, so the households within the site will have to be merged into already overstretched local exists within dental practices in the Thatcham area. The proposal fails to address any form of primary healthcare provision requirement. 3 Environment. The proposed site will cause permanent damage to the Bucklebury Plateau Biodiversity Opportu development in the setting of the North Wessex AONB, and cause detrimental impacts to legally protected wild to mitigate these far reaching and irreversible effects, and the LPR's own sustainability appraisal accepts that S on environmental sustainability. It is shameful that WBC entertain a proposal with no concrete mitigations for unleashed. The management vision for Bucklebury Common necessitates the minimising of extra human pres SP17 would necessarily cause an overspill of people to reek havoc with the fragile ecosystems of the Common on the environment of the AONB, and there appears to be no strategy to meet the requirement to achieve the The proposal fails in all areas of protecting the environment generally, and in legally required areas to improve of serious attempts to investigate, analyse and address the consequences of this proposal. It is unsound in th 4 Education. There is no end to end plan for education within the plan. The plan does not provide evidence of th secondary school location, the number of Form Entries at any school, timing of funding, and whether any funding obligations to provide education. It appears that less than a 6FE school is unsustainable, so it not clear as to what the education plan is. The cu enough houses to justify a new secondary school, so pupils would have to be crammed into already overstretched add to Thatcham's education problems rather than provide any form of answer. It is sadly laughable that the pla

	<p>demographic predictions for education demand, or predictions of the long term capacities of local schools. Ob then their associated facilities (such as sports fields) would not be available to the community.</p> <p>WBC has a duty to make arrangements for suitable school provision. The LPR fails to provide evidence as to and as such is unsound in another major area.</p> <p>For me personally, the disregard of the effect of traffic on the Bucklebury area is particularly worrying. The area will be seriously affected because all other roads will become gridlocked. My ability to walk and cycle on local roads will be seriously affected around the local area. However, this is nothing compared to the dramatic and irreversible catastrophe that would occur without reasonable mitigation to prevent wholesale damage. WBC must take time to reconsider.</p> <p>On 6th December 2022, the Secretary of State for Housing and Communities detailed that the housing number should be a target point and not be mandatory, and that Planning Inspectors should no longer override sensible local decision making in the face of local constraints and concerns.</p> <p>The NPPF consultation which ran until yesterday also focussed on the need to take into account the character of an area and its ability to accommodate housing. Many sensible local authorities paused their plan making process accordingly. It was the same, as this proposal might be trying to fit (badly) a need that is no longer present.</p> <p>I urge WBC to reconsider this unsafe plan. It is unsound in too many areas with too many questions unanswered.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Price, Janet M
<p>Consultee Full Name</p>	Janet M Price
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1511
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation

Order	60
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 00:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am objecting in the strongest possible terms to the plan to build on our beautiful countryside to the detriment of the fields and trees much admired in the area.</p> <p>Since moving to Upper Bucklebury in 2006 traffic through the village has increased considerably and the majority of come through the village in preference to the A4 which will make it extremely difficult to turn out of our drives onto B</p> <p>New residents will be given preference to Kennet School which is already crowded which will mean that children in E to Downs School. Vast swathes of our countryside have been concreted on. Wildlife is increasingly limited to smaller appreciate people have to live somewhere but brownfield sites are underused and apparently an area in Colthrop is b has even offered to build a new bridge.</p> <p>I hope and pray that the numerous objections will be listed to and taken into account.</p>

	<p>People in Bucklebury and Upper Bucklebury live where they do as they want to live in a country village and not part I have been told that the development will be over a period of 20 years and whilst its completion will no longer affect countryside in the future and our younger population who will still benefit from our fields and woods.</p> <p>PLEASE consider the future of the countryside.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Environment Agency
<p>Consultee Full Name</p>	Judith Montford
<p>Consultee Organisation</p>	Environment Agency
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1559
<p>Chapter / Policy / Appendix Number</p>	Policy SP 17
<p>Chapter / Policy / Appendix Title</p>	North East Thatcham Strategic Site Allocation
<p>Order</p>	60
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	03/03/2023 16:29:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes</p>	Yes

* No	
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the LPR to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	This allocation which is for approximately 1,500 dwellings which will be completed within the period of the Plan has been made taking into account environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of the site. Including this information in the policy page will provide perspective which then highlights the need for the necessary resources on this site.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other local authorities when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally during the Plan making process.
4. Proposed Changes	The below should be addressed and included in Policy SP17 - North East Thatcham Strategic Site Allocation as follows: Requirements There should be no penetration of the London Clay strata. No discharge into groundwater and information should be provided to the Environment Agency's Approach to Groundwater Protection guidance Environment Agency's Approach to Groundwater Protection guidance for all types of development proposals. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/67111/Environment-Agency-approach-to-groundwater-protection.pdf] The 'North East Thatcham' strategic site contains an area which is an existing flood defence, recently completed by West Berkshire Council (the 'East Thatcham Park Flood Storage Area'). In addition, further surface water management schemes are being planned by West Berkshire Council including 'East Thatcham'. The existing and planned surface water schemes should be mentioned in this section, including the 'East Thatcham' strategic site.

	<p>of these schemes in a comprehensive flood risk assessment when planning development in this area. This site would which demonstrates requirements of NPPF and PPG. This is due to its size and strategic nature.</p> <p>We would not support any additional flows to Newbury STW (as is the case for some other allocations). Newbury STW its dry weather flow - DWF capacity, and the development planned to drain to the STW would certainly take it over capacity. It would be required that ensured no deterioration of any quality elements. Newbury STW is to get a 0.1mg/l phosphorus permit to meet the CSMG requirements of getting the River Kennet SSSI to good status. Before any development connecting to the STW would need to have confidence that the additional phosphorus load would not undermine the AMP 8 objectives. 0.1mg/l would need to have confidence they would be able to meet that target with any additional loading. The Environment Agency would need to reduce their phosphorous loading from STWs by 80% from a 2020 baseline. Permit limits lower than 0.25mg/l do not allow higher loads to a STW with a permit limit lower than 0.25mg/l may undermine a water companies' ability to meet the requirements. Newbury is a high spiller, and additional developments and flows will increase frequency of spilling. Therefore, we would not support flows entering - the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the spills. Notes on Policy DM7, adequate water supply and wastewater treatment infrastructure capacity resources must be available for proposed development proposed prior to the occupation.</p> <p>Opportunities</p> <p>There may be opportunities to enhance the river corridor which would contribute to biodiversity net gain.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>We wish to attend the examination for an opportunity to explain the need for this site allocation to include</p> <ul style="list-style-type: none"> • environmental constraints • site requirements to enable development and • opportunities to ensure the sustainable delivery
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Titheridge, James
Consultee Full Name	James Titheridge
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1686
Chapter / Policy / Appendix Number	Policy SP 17
Chapter / Policy / Appendix Title	North East Thatcham Strategic Site Allocation
Order	60
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail

Response Date	03/03/2023 16:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	We are unable to confirm whether the Local Plan Review is considered legally compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The current plan to improve access to the health service component of community infrastructure has not been met as t for the provision of a viable primary care medical facility nor working with the current practices in the area so the NPPF
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	As far as we have been made aware the development has neither arranged a relevant HIA nor provided evidence of local health care agencies or providers. They are proposing a healthcare site that is unsuitable for NHS primary care to mitigate the burden that 1,500 or more new houses will make on a local NHS struggling to cope, so the duty to co been met.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	No

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	

Policy SP 18 Housing Type and Mix

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Abri Group LTD
Consultee Full Name	Meghan Rossiter
Consultee Organisation	Abri Group LTD
Agent Full Name	
Agent Organisation	
Comment ID	PS44
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	14/02/2023 13:18:16
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>The amended text to this policy in relation to delivery of M4(3) wheelchair user dwellings is supported, however it is questionable whether this applies to major development only, and the wording on delivery against each tenure is ambiguous and should be amended for clarity.</p> <p>The update to Table 3, now including recommended housing mix split by different affordable housing tenures is supported. This, together with the supporting text acknowledging that rigid application of the mix may not always be appropriate, is a useful tool in bringing forward mixed tenure development, and justified.</p> <p>It appears that there is text missing from the end of paragraph 6.68 (clean version and 6.73 in the tracked change version).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The amended text to this policy in relation to delivery of M4(3) wheelchair user dwellings is supported, however it is questionable whether this applies to major development only, and the wording on delivery against each tenure is ambiguous and should be amended for clarity.</p> <p>All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). <u>On developments of 10 or more dwellings</u> around 10% of the new market housing and <u>10% of the affordable dwellings, up to</u> a maximum of 5 units should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would <u>be impracticable or</u> make the scheme unviable.</p> <p>The addition of the wording "<i>be impracticable or</i>" reflects the supporting text at paragraph 6.72 (clean version and 6.77 in the tracked change version), and is important given the practical, physical requirements of meeting M4(3) which may not be possible on all sites, or in the proposed housing mix.</p> <p>It appears that there is text missing from the end of paragraph 6.68 (clean version and 6.73 in the tracked change version). This should be checked, and updated.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Ridgepoint Homes Ltd</p>
<p>Consultee Full Name</p>	<p>Miss</p>

	Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS195
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	Yes

* Yes * No	
Please give reasons for your answer	We support the requirement for residential developments to contribute to the delivery of an appropriate mix of dwelling tenures, types, and sizes to meet the existing and future housing needs of all sectors of the community. However, we disagree with the requirement for market dwellings on developments of 10 or more dwellings to reflect the mix set out in Table 3 of the draft Plan. We are of the view that the mix and size of market units should be determined by current market preferences as well as the location and size of the site, as set out in points a-d in the draft policy, rather than stipulating a specific blanket mix of dwellings to be applied to all sites. For example, an appropriate mix for an urban site in a town centre location would generally comprise smaller units whereas in a rural location the appropriate mix would generally comprise larger units.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We suggest that the requirement to reflect the market housing mix in Table 3 is deleted, with this mix applicable to affordable housing only, and points a-d in the draft policy remain as the considerations for determining the appropriate market housing mix. We therefore suggest the policy wording is amended to state "residential developments should provide a mix of unit sizes. The mix of affordable dwellings on all sites should reflect the requirements of Table 3 in the supporting text to this policy, or any more recent evidence published by the Council. The mix of market dwellings will have regard to [points a-d]". In regard to accessible and adaptable dwellings, we disagree with the requirement for 10% of market units to be designed to M4(3) standards. This is an optional standard introduced by the Government, and we suggest that this should apply on a site-by-site basis to reflect the local need and demand for such market units. We therefore suggest that the requirement for M4(3) market units is deleted.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Harry West Investments Ltd
Consultee Full Name	Harry West Investments Ltd
Consultee Organisation	Harry West Investments Ltd
Agent Full Name	Kay Collins
Agent Organisation	Solve Planning
Comment ID	PS394

Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We support Policies SP18 and 19 along with Policies DM16 to DM19 which seek to provide a good mix of dwelling size and types.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hoddinott, Keith
Consultee Full Name	Keith Hoddinott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS487
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type	Letter
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Councils do not appear to be singing to the same "hymn sheer as the Government.</p> <p>Housing is clearly the answer to many issues beyond the simple need of "roofs over heads" - financing social needs being one example (high rents for low income & homeless. Are high rents discouraging lower paid care workers into the area to fill job vacancies?).</p> <p>One area where I believe housing could be undertaken is west of the end of Craven Road, south of the canal, and adjoining Enborne Road unto the A34, with a new access onto the A34 - once again coordinated with any future improvements to the A34, which have recently been advocated with public and local MP support, and maybe in the Chancellor's INFRASTRUCTURE budget recently announced.</p> <p>This access would give another exit/entry for the town south of the river.</p> <p>I believe that unless a far-reaching vision is not formulated to prevent the strangulation of the movement within the conurbation, Newbury will face a permanent gridlock.</p> <p>The provision of housing is a major issue, and local opinion can be a major factor in resisting proposed development. However, it is clear that more housing is required if</p> <p>Newbury is to continue to prosper. The advent of the electrification of the train service to London will only increase the demand on the limited supply, which will inevitably increase prices unless the supply is increased. Un-fortunately it is inevitable that cherished open green field sites will have to be developed, but the densities should be low. Clearly in a small country such as the UK, horizontal space is at a premium. Therefore, there should be some vision to think vertically, such as more 3 floor properties, and the consideration of basements</p> <p>& underground parking. Within the boundaries of the town, there are plenty of examples of this style of building from previous generations.</p> <p>Houses should be adaptable to be extended (incl. use of roof space) at a later date to accommodate, say an elderly relative, live-in carers, sons/daughters living at home, but working/studying.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holybrook Parish Council
Consultee Full Name	Pamela Kirkpatrick
Consultee Organisation	Holybrook Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS648
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 11:31:39
Attached Files	Local_Plan_Review_HPC_Response_02_2023.pdf (2)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	No

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Holybrook welcomes the statement in this policy: 'All dwellings should be delivered as accessible and adaptable dwelling in accordance with Building Regulations M4(2).'</p> <p>But would like to see this strengthened to specifically state <i>that 'All dwellings, including change of use, should be delivered.....'</i>. Accessibility and inclusivity must be given Material Planning Consideration status, especially where the change of use is from a dwelling to a care home. Holybrook has been subjected to planning approvals for change of use where accessibility, in particular, has been ignored at the planning stage and told that accessibility comes under Building Regulations. Where a building is new or is undergoing a change of use it is vital that accessibility formulates part of the planning proposals and where plans do not meet accessibility regulations, it should be refused.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Accessibility and inclusivity must be given Material Planning Consideration status.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS537
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:31:14
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	This policy seeks a mix of different sizes of homes based on updated Strategic Housing Market Assessment work. It is worth noting in this context that the need for homes in Reading is for approximately 50% 3-bed or larger, but the actual delivery is very significantly below this due to the realities of the types of site that come forward, where much of the delivery is at high density in the town centre. This will mean a need to place further emphasis on delivering family accommodation in adjoining areas, particularly where those areas are within the wider Reading urban area.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>RBC suggests that changes be made to the supporting text to allow this to be considered when planning applications are determined. The suggested changes are set out below:</p> <p>“To ensure mixed and balanced communities, a mix of dwelling sizes, in line with the table above, will be sought from developments delivering new homes. While developments will be expected to reflect this mix, rigid application of these requirements may not be appropriate in all cases. When considering the appropriate mix, the Council will have regard to:</p> <ul style="list-style-type: none"> • the scale of development; • individual site circumstances including location, character of surrounding area, and any physical building constraints, particularly in relation to conversions; and market conditions. • viability, subject to the applicant submitting a viability assessment at the application stage and its independent assessment by the Council; • <u>the latest position on delivering the size of dwellings required, including in adjoining authorities where it is part of the same urban area;</u> and • information within made neighbourhood plans and any associated local housing needs surveys”
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)
Consultee Full Name	Natasha Styles
Consultee Organisation	The Planning Bureau on behalf of McCarthy Stone
Agent Full Name	Natasha Styles
Agent Organisation	The Planning Bureau on behalf of McCarthy Stone
Comment ID	PS564
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 09:19:44
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.</p> <p>Given the large amount of specialised housing for older people identified in para 11.18 of the Local Plan review (1,718 units) and the requirements of national policy detailed in our response to SP12 (NPPF Paragraph 62, PPG Housing for Older and Disabled People, paragraph 001 Reference ID: 63-001-20190626 , para 003 Reference ID: 63-003-20190626 and para 006 Reference ID: 63-006-20190626), Policy SP18 should be amended to emphasise and encourage this need.</p> <p>In addition, it is noted that a change to policy SP18 introduced following the regulation 18 consultation brings into the plan a requirement for M4 (2) (accessible and adaptable) and M4 (3) wheelchair housing. This change to policy SP18 states '<i>All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable.</i>'</p> <p>The Council should note that the 'Viability Assessment Update (2021 -2022) Local Plan Review Autumn 2022, Dixon Searle' states at para 3.1.44 that '<i>However, although the larger footprints could be designed in at early feasibility stage, the current view of costs associated with M4(3) provision is such that in our view this could have an impact which not all schemes may be able to bear. This could impact more on some schemes on PDL in particular, where there tend to be more constraints.</i>'</p> <p>We would like to remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>" (Paragraph: 002 Reference ID: 10-002-20190509). M4 (3) of the Building Regulations in particular has a cost implication as recognised by the Council's viability assessment and therefore including the requirement for 10% of new housing to be built to M4 (3) is contrary to the findings of the Council's own evidence and will result in schemes not being delivered and should therefore be removed.</p> <p>The Council should also note that ensuring that residents have the ability to stay in their homes for longer through the provision of wheelchair housing, is not, in itself, an appropriate manner of meeting the housing needs of older people. Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing. In addition, as M4 (2) is to be incorporated into the Building Regulations this element of the paragraph should also be removed.</p> <p>Recommendation:</p> <p>For the policy to be consistent with national policy and in accordance with the Council's own evidence policy Para 1 of SP18 should be amended to emphasise the importance of older people so it reads:</p> <p>Residential development will contribute to the delivery of an appropriate mix of dwelling tenures, types and sizes to meet the existing and future housing needs of all sectors of the community, including older people and those with specialist requirements.</p> <p>New para 4 should be deleted from policy SP18 as this repeats the Building Regulations and is contrary to national policy and the Council's own viability study:</p> <p>'All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable.'</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	<p>Recommendation:</p> <p>For the policy to be consistent with national policy and in accordance with the Council's own evidence policy Para 1 of SP18 should be amended to emphasise the importance of older people so it reads:</p> <p>Residential development will contribute to the delivery of an appropriate mix of dwelling tenures, types and sizes to meet the existing and future housing needs of all sectors of the community, including older people and those with specialist requirements.</p> <p>New para 4 should be deleted from policy SP18 as this repeats the Building Regulations and is contrary to national policy and the Council's own viability study:</p> <p>All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable.¹</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS711
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park West (SPW) Policy SP18 (Housing Type and Mix) now requires 10% market dwellings, and 5 affordable units, to be Building Regulations Part M4(3) compliant. It is unnecessary to repeat Building Regulation requirements within Planning Policy and, accordingly, the policy should be amended to delete this requirement.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes

5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bridle, David
Consultee Full Name	David Bridle
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS552
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 21:07:18
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	SP18 has not assessed the fact that Thatcham already has a very high number of social housing and that the area of the North East is rated highly in terms of social deprivation so the housing mix should be bias towards equalising this disparity and creating higher percentage of larger family homes. The home sizes have not reflected the fact that people these days mostly work from home and therefore a 2 bed is really a 1bed plus office.. so there needs to be a higher proportion of 3-4 bed dwellings to cater for home working.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1323
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	Yes

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Support. Reference to site specific viability (Criterion D) is welcomed. As a national-wide developer and promoter of Sandleford Park, Bloor has a comprehensive understanding of the market and viability considerations. Consequently, it is well placed to propose an appropriate mix and type of homes.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS839
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP18 – HOUSING TYPE AND MIX</p> <p>As well as addressing Accessible Housing this policy also needs to ensure a sufficient supply of Adapted Housing to cater for Older Adults with Dementia who require specific types of housing to cater for their incurable regressive brain disease along with a Carer either Family Unpaid Carer or paid Care Giver. I tried to find such Accommodation for 2 years and nothing <u>Affordable</u> was available. People are buying new properties and having fittings ripped out to accommodate elderly relatives and this is not sustainable development.</p> <p>West Berkshire is a Dementia Friendly Council and within this plan there is no DM Policy to support this Approach unlike Milton Keynes which has a Dementia Friendly SPD.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1684
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Last year the Government published its response to the consultation on the building regulations governing accessibility - Part M (https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response). This response states that the Government will make part M4(2) the mandatory standard. Whilst this is still to be introduced, given the likelihood that the Government will make M4(2) the mandatory standard we would recommend that the Council amend its policy accordingly to ensure no unnecessary repetition of building regulations within planning policy.</p> <p>With regard to option standard for wheelchair accessible housing set out in part M4(3) we are concerned that the requirement for 10% of market housing and a maximum of five affordable units are built to this standard is not supported by the Council's evidence. It is estimated that there is a need for 1,400 additional homes for wheelchair user homes. This level of need is arrived at on the basis that there is an existing need of 420 homes and projected increase in need of 797 such homes over the plan period. However, the projected need does not appear to take into account the fact that many of these additional households will already live in the Borough and will live in homes that can be adapted to meet their needs. As the Council note in relation to existing households about 25% live in home where it would be problematic or unfeasible to make visitable and therefore it cannot be assumed that all those with such a need in future will seek to have that need met by moving to a new home. If the 25% is applied to future households, then the newly arising need for homes built to M4(3) is around 200 households, giving a total need of 620 homes, significantly lower than the 1,200 homes suggested by the Council. Therefore, the requirements relating to M4(3) are not justified and should be reduced to reflect the evidence.</p> <p>The policy also lacks clarity as to what is required of an applicant. With regard to the provision of M4(3) in market housing the policy reads more as a statement of a broader ambition rather than a requirement placed on all development. Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous and the Council needs to set out in policy more clearly what it is expecting from development with regard to this optional standard.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	Yes

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1430
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Support policy in general, but object to the statement "Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings...". The word "around" is far too vague and the reason for "a maximum of 5 units" is difficult to justify.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	The statement should be changed to "10% of new market housing and affordable housing should each also meet the wheelchair accessible standard M4(3) wheelchair user dwellings...".
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1624
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Policy SP18: Housing Type and Mix</p> <p>Delivery of dwellings to M4(3) standard may not be reasonably practicable in all cases.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
<p>4. Proposed Changes</p>	<p>To provide for greater flexibility to examine planning applications on a case-by-case basis, thereby improving the effectiveness of the policy, the following amendments are recommended:</p> <p>i) Around 10% of the new market housing and a maximum of 5 units of the affordable-sector <u>homes delivered on-site</u> should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable <u>or would be unfeasible to deliver</u>.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1715
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Delivery of dwellings to M4(3) standard may not be reasonably practicable in all cases. To provide for greater flexibility to examine planning applications on a case-by-case basis, thereby improving the effectiveness of the policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	the following amendments are recommended: ii) Around 10% of the new market housing and a maximum of 5 units of the affordable-sector <u>homes delivered on-site</u> should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would make the scheme unviable <u>or would be unfeasible to deliver</u> .
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tim North & Associates Limited
Consultee Full Name	Tim North
Consultee Organisation	Tim North & Associates Limited
Agent Full Name	Tim North
Agent Organisation	
Comment ID	PS1517
Chapter / Policy / Appendix Number	Policy SP 18
Chapter / Policy / Appendix Title	Housing Type and Mix
Order	63
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 19:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	No

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Local Plan Review (LPR) strategy where it relates to specialist older persons accommodation has not been positively prepared, is neither justified nor effective, nor is it consistent with national policy. Policies SP18, DM1, DM4, and in particular Policy DM19 of the LPR when read as a whole have not fully taken into account the fact that the population of older people in England is growing rapidly, with the consequence that ensuring future housing supply is met on the basis of “Lifetime Homes Standards” will not of itself be either suitable or capable in meeting the accommodation requirements of various types of specialist older households.</p> <p>The need to consider specialist older persons accommodation in adjoining authorities to assess the extent to which they can meet their own requirements; considerations relating to changes in the type of care home accommodation; attrition levels seen in terms of the reasons behind the closure of care homes; viability issues which can result in substantially different characteristics relative to general housing, and lessons to be learnt from the recent Covid-19 pandemic, with consequences for the design and access to communal open space of specialist older persons accommodation; all play an important role in the need for, and hence the likely future provision of this form of housing. It is contended that these material considerations effecting specialist older persons accommodation have not been fully met in the policies in the LPR, being considered in greater detail later in these representations.</p> <p>The ONS 2019 Mid-year population estimates indicate that over the past 20 years (1998-2018) the number of residents aged 65 and over in England increased by approximately 31%; more than double the rate of growth than the total population over the same time period (15%).</p> <p>This ageing trend is expected to accelerate in that the 2018 base i.e: the ONS 2019 National Population Projections, reveal that the older population in England could increase by some 41% over the 20 year period between 2018 and 2038, meaning that by 2034, almost 1 in 4 (24%) of the population in England are expected to be aged 65 or over. The rate of growth in West Berkshire over the period 2022 to 2039 for residents aged 75 or over, is projected to increase by 64%.</p> <p>Current national policy as set out at paragraph 62 of the NPPF 2021 requires local planning authorities to consider inter alia:-</p> <p><i>“... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including but not limited to, those who require affordable housing, families with children, <u>older people</u>, students, people with disabilities ...”</i> (my emphasis)</p> <p>The NPPG at paragraph 001 Reference ID: 63-001-20190626 states</p> <p><i>“The need to provide housing for older people is <u>critical</u>.”</i> (underlining as per the NPPG; my emphasis)</p> <p>Government guidance concerning older persons specialist housing refers to there being a “critical need”, a term absent when describing all other forms of housing need, emphasising the importance to be attached to specialist older persons housing provision.</p> <p>The Guidance goes on to explain in paragraph 006 Reference ID: 63-006-20190626 that :-</p> <p><i>“... These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or arrange for the number of units of specialist housing for older people needed across the plan area throughout the plan period.”</i> (my emphasis)</p> <p>Whilst paragraph 013 Reference ID: 63-013-20190626 states:-</p> <p><i>“It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers, and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation).”</i>(my emphasis)</p> <p>The same NPPG sets out at paragraph 010 Reference ID: 63-010-20190626 the different types of specialist housing for older people; all of which have differing consequences seen in terms of delivery; whilst the contents of paragraph 016 Reference ID: 63-016-20190626 are of relevance, highlighting the fact that:</p> <p><i>“Decision-makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people... Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”</i>(my emphasis)</p> <p>The West Berkshire Housing Needs Assessment Update published by Icen Projects Ltd on behalf of your Council states in paragraph 5.35</p>

"It can be seen by 2039 there is an estimated need for 1,137 additional dwellings with support or care across the whole study area. In addition, there is a need for 1,032 additional nursing and residential care bedspaces. Typically for bedspaces it is conventional to convert to dwellings using a standard multiplier (1.80 bedspaces per dwelling for older persons accommodation) and this would therefore equate to around 573 dwellings. In total, the older persons analysis therefore points towards a need for around 1,710 units over the 2021-39 period (95 per annum) – the older person need equates to some 19% of all homes needing to be for some form of specialist accommodation for older people."

These provisions are similarly reflected in the Housing Background Paper prepared by your Authority in January 2023.

I have previously referred in these representations to a proposed 64% change in the population of older persons of 75 years + between 2021 and 2039. This figure has to be examined in the context of the need for specialist housing for the elderly set out in paragraph

The LPR is to seek *"specialist accommodation"* as an integral part of the strategic housing allocations at Sandleford Park and North East Thatcham. The only specialist older persons accommodation being proposed is an Extra Care scheme on land at Stonehams Farm, Tilehurst, being the only allocated site for specialist elderly persons accommodation to 2039.

During the nine-year period commencing 2013/14 leading up to 2021/22, a total of 227 Class C2 rooms were completed, amounting to five schemes, of which 204 comprised three individual schemes in Newbury, revealing why it is considered that either further allocations should be made for specialist older persons housing, and/or the need for flexibility in the location of such specialist housing schemes in Policy DM1.

The Housing White Paper *"Fixing Our Broken Housing Market"* published by DCLG in February 2017 recognised the importance of *"offering older people a better choice of accommodation"* at the same time highlighting that *"helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers."* It is noted that the same White Paper recognised the *"barriers to people moving out of family homes that they may have lived in for decades"* and the *"emotional attachment ... which means that where they are moving to needs to be very attractive to them and suitable for their needs over a twenty to thirty year period."* The Housing White Paper clearly expresses the Government's commitment to *"exploring these issues further and finding sustainable solutions to any problems that may come to light."*

The Government launched a Select Committee Inquiry into the issue of housing for older people in response to the House of Commons Communities and Local Government Committee (2018). The Inquiry report published in February 2018 aimed to reflect the diversity of older people in terms of their ages, individual circumstances, choices and preferences. It concluded inter alia that:

- A national strategy on housing provision for older people is needed, and should be introduced in consultation with older people and those who provide for them;
- Independent research should be commissioned on the wider housing market impact of older people moving to a smaller home that better suits their needs, to further explore frequent claims that this could be part of the solution to tackling the housing shortage;
- National planning policy should give greater encouragement to the development of housing for older people, ensuring that sites are available for a wider range of developers;
- The new standard approach to assessing housing need should explicitly address the complex and differing housing needs of older people;
- Older people should be able to choose from a wide choice of housing which can accommodate their needs and preferences, including smaller general needs housing, accessible housing, retirement homes, extra care housing and cohousing;
- Local authorities should produce strategies explaining how they intend to meet the housing needs of older people, with Local Plans identifying a target proportion of new housing to be developed for older people as well as suitable well-connected sites close to local communities; and
- Local authorities should be more receptive to private developers who wish to build housing for older people in their area, and appreciate the potential health and wellbeing benefits leading to reduced need for health and social care

Knight Frank in their 2021 Research Paper entitled *"Health Care Development Opportunities"* found that the UK health care market needs upgrading, with 71% of homes older than 20 years; at least 40% of homes having been converted from other uses and many be outdated, with 29% of beds lacking en-suite facilities. They forecast that the Covid-19 pandemic was likely to accelerate the closure of outdated homes and replace them with high quality assets. They went on to add that the Covid-19 pandemic would no doubt prompt a change in the way care homes are designed and configured, with particular emphasis placed on internal circulation, air quality and ventilation, with further focus directed towards transitional and communal space, with a view to maintaining an element of social distancing. A similar shift in preferences with greater attention is anticipated in respect to important outdoor and breakout spaces.

Levels of attrition involving the closing of care homes needs to be assessed in the future, with the average size of newly registered care homes across the country, i.e. those constructed in the last 56 years being 62 beds, contrasting with the average size of care homes closing over the same time period amounting to 29 beds.

It is also important to consider that there are a number of factors which affect the viability of developments relating to specialist housing for older people, one of the most significant being that they incorporate a significant provision of communal space and on-site facilities, in addition to individual rooms/units, and common parts evident in general need apartment blocks. As a result, the efficiency of age restrictive developments seen in terms of the floorspace of individual units (net) to the total floorspace (gross) is significantly poorer than in traditional or general needs housing. In short traditional general needs housing uses 100% in terms of net:gross efficiency, with a figure of 84% net:gross efficiency envisaged for apartments. Care homes, Extra Care facilities and sheltered living/retirement living apartments in contrast are only able to achieve between 40 and 75% net:gross efficiency.

	<p>In addition to these design considerations, there are higher construction costs, with greater requirements in terms of achieving higher accessibility requirements, comprising lifts, specially adapted bathrooms, treatment rooms, with those providing these important facilities relying on third party building contractors who are unable to secure the same economies of scale as volume housebuilders.</p> <p>To these considerations should be added slower sales, given they are directed at a specialist older persons market, with the inability to phase flatted schemes to sales rates, resulting in higher finance costs for developments.</p> <p>It is for a combination of these reasons that it is contended the LPR needs to be more proactive in delivering development to meet specialist older persons housing, which it is contended is not being met through the allocation of sites to meet these specialist housing needs. If this process is not addressed, with authorities relying on the market to being forward sites, with viability assessments at the decision-taking stage, it is considered less likely that sites will come forward for this much needed use, although this situation can be alleviated by incorporating into Policy DM1 an exception in respect of specialist older persons housing subject to a quantitative and qualitative need accompanying any such submission.</p> <p>These considerations which affect specialist older persons housing were accepted by the Inspector Harold Stephens in an appeal decision concerning land at Sonning Common (PINS Ref. No. APP/Q3115/W/20/235861), viz:-</p> <p><i>“117. Extra care housing undoubtedly operates in a very different market. Mr Garside provided detailed evidence to the inquiry how the market for land operates to the detriment of extra care operators. Extra care housing providers cannot compete with house builders or with other providers of specialist housing for older people because of the build costs, the level of the communal facilities and the additional sale costs including vacant property costs. The communal facilities must be provided before any units can be sold and sales tend to be slower. However, I accept that extra care schemes can charge a premium for the specialist accommodation provided and also benefit from an income from deferred management fees.</i></p> <p><i>1 It seems to me that these factors, all mean that age restricted developments and in particular extra care communities are less viable than traditional housing schemes. Ultimately, age restricted developers are less able to pay the same price for land as residential developers and it is much harder for age restricted developers; and in particular those seeking to deliver extra care, to secure sites for development and meet the housing needs they aim to supply. Viability is clearly a relevant factor which supports the case under paragraph 172b) of the NPPF. There is also a strong case for the appeal scheme given the lack of alternative sites in the light of Policy H9 of the SOLP.”</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>There is a need in the evidence base to provide a detailed assessment of the different types of specialist housing for older people, which for various reasons cannot be successfully accommodated in adjoining authorities, in order to evaluate whether there are certain diverse links for older persons accommodation which are more likely to be met in West Berkshire. To consider housing solely from a generic basis where the form of housing is in critical need is not considered satisfactory, and more importantly, will only exacerbate the need in the future for older persons accommodation.</p>
<p>4. Proposed Changes</p>	<p>There is a need to adopt a more flexible approach towards specialist housing for older people, for which the Government confirms there is a critical need, so that emphasis can be placed on ensuring that their requirements are met, in the same way as is the case for the housing needs of travellers. Both travellers and older people comprise different groups within the community which are required to be assessed and reflected in planning policy, in accordance with paragraph 62 of the NPPF 2021.</p> <p>This means encompassing specialist housing for older people as a category which exceptionally may be provided as a form of residential development in the countryside, in accordance with Policy DM1, subject to a quantitative and qualitative need being shown. The significance of this proposed policy change is evident in appeal decisions where care proposals, both Extra Care and care homes, are being allowed in the countryside in locations not normally considered acceptable in planning terms, such as in the Metropolitan Green Belt; Area of Outstanding Natural Beauty and sites on the edges of small villages, as well as next to listed buildings and conservation areas. This is a reflection of Inspectors consistently recognising the national imperative of providing more care facilities in the light of the very clear instruction that the need is now critical. It is also the fact that a number of local authorities are failing to properly address or recognise that need.</p> <p>There is also a requirement to look at the qualitative need for specialist housing for older people, meaning an examination of the District’s current care home stock, which includes converted buildings, along with attrition rates, i.e. the loss of care home facilities. The requirement in this respect should be based on an appropriate standard room, being a single occupancy room with en-suite toilet, wash basin and flat floor shower, i.e. a wet room, the latter being particularly important to avoid the risk of elderly people tripping or falling in the shower. It also requires a shower stool or seat to be placed within easy access in the shower. The appropriate standard in this respect is that envisaged by the Care Act 2014 Section 5 paragraph 1(b).</p> <p>This requirement is now all the more persuasive following the shocking evidence of those who have passed away in care homes due to the Covid-19 pandemic. It is not difficult to see why when so many people who passed away lived in accommodation focused on sharing facilities, which, post Covid, is now completely unacceptable. The extent to which there is an appropriate standard of accommodation should dictate the need in the future for all forms of specialist older persons housing in the LPR. In addition, there is a need to carry out an assessment as set out in answer to Question 3 above.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 19 Affordable Housing

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Abri Group LTD
Consultee Full Name	Meghan Rossiter
Consultee Organisation	Abri Group LTD
Agent Full Name	
Agent Organisation	
Comment ID	PS45
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	14/02/2023 13:20:26
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We note the inclusion of First Homes within this updated draft policy, and understand why this has been included. It is important to note that other local planning authorities, including Bath and North East Somerset Council and Guildford Borough Council, have identified the lack of affordability of First Homes within their communities and taken steps to prioritise other affordable housing tenures. In the case of B&NES Council due to the evidence demonstrating that First Homes is not affordable and would affect delivery of other affordable tenures, it has decided not to implement the national guidance and excluded the tenure from their policies and guidance. In the case of Guildford BC the emerging local plan policy H8 incorporates flexibility to deliver alternative affordable home ownership tenures where delivery of First Homes would "lead to an adverse planning outcome".</p> <p>The Updated Housing Needs Evidence (July 2022) demonstrates that First Homes will require additional discounts above the national figure of 30% to be affordable to people in housing need in West Berkshire, and these higher discounts will also prejudice the viability of delivering affordable rented housing. The introduction of First Homes as expected by the national guidance may reduce the opportunities for mixed tenure developments to meet local housing needs, contrary to national policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We ask that the Council review whether the omission of the tenure, as supported by Bath and North East Somerset Council, or flexibility, such as that incorporated by Guildford Borough Council could be built into the policy to allow for different proportions of each tenure to be delivered in response to local need, affordability, and viability. A reduction in the level of First Homes required in the policy, or across individual sites, would protect the overall level of affordable housing being delivered. Flexibility within the policy would be justified by the evidence base.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Ridgepoint Homes Ltd</p>
<p>Consultee Full Name</p>	<p>Miss Emma Runesson</p>
<p>Consultee Organisation</p>	<p>Ridgepoint Homes Ltd</p>

Agent Full Name	
Agent Organisation	
Comment ID	PS196
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes

Please give reasons for your answer	<p>Whilst we acknowledge that affordable housing is a requirement, we do not support the amended wording for affordable housing to be “required” on sites as this does not offer sufficient flexibility to negotiate an alternative provisions or arrangements in exceptional circumstances, as noted in the following wording of the draft policy. We therefore suggest that the policy wording is reverted to “sought by negotiation” as shown in the tracked changes version of the draft Plan.</p> <p>We do not support the requirement for affordable housing to be sought on sites of between 5 and 9 dwellings, as noted in point b in the draft policy, as this conflicts with paragraph 64 of the NPPF which states that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. In addition, the provision of affordable housing on such sites could become unviable for these smaller developments. We therefore suggest that point b is deleted.</p> <p>We do not support the requirement for affordable homes to be built to net zero carbon standards. This should be reflective of the building regulations requirements, and we suggest that this requirement is deleted. Please refer to our comments in respect of Policy DM4.</p> <p>Finally, whilst we support the requirement affordable homes to be appropriately integrated within developments, this can result in management issues for Registered Providers if affordable units are dispersed across the development. In our experience, it would typically be Registered Providers' preference for affordable units to be delivered in clusters for ease of management. We therefore suggest that this requirement is amended to include a maximum cluster of 15 units houses and 21 units for apartments, taking account of the typical apartment block size.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	<p>We therefore suggest that the policy wording is reverted to “sought by negotiation” as shown in the tracked changes version of the draft Plan.</p> <p>We therefore suggest that point b is deleted.</p> <p>We do not support the requirement for affordable homes to be built to net zero carbon standards. This should be reflective of the building regulations requirements, and we suggest that this requirement is deleted. Please refer to our comments in respect of Policy DM4.</p> <p>In our experience, it would typically be Registered Providers' preference for affordable units to be delivered in clusters for ease of management. We therefore suggest that this requirement is amended to include a maximum cluster of 15 units houses and 21 units for apartments, taking account of the typical apartment block size.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Harry West Investments Ltd
Consultee Full Name	Harry West Investments Ltd
Consultee Organisation	Harry West Investments Ltd

Agent Full Name	Kay Collins
Agent Organisation	Solve Planning
Comment ID	PS395
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	We support Policies SP18 and 19 along with Policies DM16 to DM19 which seek to provide a good mix of dwelling size and types.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)
Consultee Full Name	Natasha Styles
Consultee Organisation	The Planning Bureau on behalf of McCarthy Stone
Agent Full Name	Natasha Styles
Agent Organisation	The Planning Bureau on behalf of McCarthy Stone
Comment ID	PS565
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 09:21:54
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.</p> <p><u>Specialised housing for older people</u></p> <p>We note the new wording added to policy SP19 para 10 that allows extra care housing to be considered on a case-by-case basis with regard to affordable housing and states:</p> <p><i>'In relation to extra care housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution'.</i></p> <p>However, we also note that the Viability Assessment Update, Autumn 2022, Dixon Searle (Viability Assessment), when discussing sheltered housing / retirement living advocates a similar position to extra care and states the following:</p> <p><i>'3.2.28 Overall, on this development type it may be appropriate for the Council to consider the likely frequency of such schemes and whether that justifies a particular approach. We offer these comments bearing in mind that outcomes seem likely to vary to some extent. For the Council's consideration, we suggest that if there were a little more flexibility built into the draft LPR policy wording (proposed SP19 scope as understood by DSP at the time of writing) - similar to that set to be provided for extra care housing schemes (which we often see developed on a broadly similar format) - then this may assist in respect of any potential viability issues. In our view this need not dilute too much the overall expectations / LPR approach and starting point'</i></p> <p>The NPPF now has an increased emphasis on Local Plan viability testing at Paragraph 58 and the PPG states that <i>"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"</i> (Paragraph: 002 Reference ID: 10-002-20190509).</p>

Therefore, to ensure that the plan is realistic, deliverable, justified and consistent with national policy para 4 of policy SP19 should be amended to also include sheltered housing and retirement living.

First Homes

Para 6 of Policy SP19 identifies that 25% of affordable housing should be delivered as First Homes. However, the Local Plan should clarify that certain specialist housing schemes such as those meeting the needs of older people should be exempt from providing First Homes and Starter Homes on site. This is because specialist housing for older people is often delivered on smaller sites of up to 50 units in central locations where it would not be viable to deliver on site First Homes, Starter Homes and Discount Market Sales. In addition, it would not be appropriate to mix First Homes, Starter Homes and general Discount Market Sales in specialist housing schemes for older people which by their very nature are based around communal facilities and communal living. This would ensure the Local Plan is consistent with NPPF para 66 which provides exemptions to such schemes providing affordable home ownership.

Net zero

It is also noted that policy SP19 para 11 asks that 'Affordable homes will be built to net zero carbon standards to help meet objectives on sustainability and climate change. The affordable units will be appropriately integrated within the development'. Although the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2030 is commendable, it appears that the Council is going to achieve net zero through having mandatory standards for affordable housing from adoption of the plan that go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Aligning the Council's requirement for net zero development with those of Government would therefore be pragmatic and more achievable.

Para 11 of the policy should therefore be deleted.

Recommendation:

In order to ensure the Plan is consistent with national policy, justified and effective the following amendments should be made to Policy SP19:

Amend Policy SP19 para 10 as follows:

*In relation to extra care, **sheltered and retirement living** housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution'. **Such schemes will be exempt from delivering First homes.***

Delete *Policy SP19* para 11

Affordable homes will be built to net zero carbon standards to help meet objectives on sustainability and climate change. The affordable units will be appropriately integrated within the development.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

Recommendation:

In order to ensure the Plan is consistent with national policy, justified and effective the following amendments should be made to Policy SP19:

Amend Policy SP19 para 10 as follows:

*In relation to extra care, **sheltered and retirement living** housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution'. **Such schemes will be exempt from delivering First homes.***

Delete *Policy SP19* para 11

Affordable homes will be built to net zero carbon standards to help meet objectives on sustainability and climate change. The affordable units will be appropriately integrated within the development.

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

- * Yes
- * No

No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan

Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS840
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point. SP19 – AFFORDABLE HOUSING Existing Policy has failed. No Comment on whether this is more likely to succeed.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham

Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS538
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:31:52
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes

Please give reasons for your answer	<p>RBC welcomes the proposal to require significant levels of affordable housing on development sites, and the proportions required are broadly in line with those in the Reading Borough Local Plan. Delivering as much affordable housing within the plan area as possible will avoid placing undue burdens on neighbouring authorities.</p> <p>RBC particularly supports the proposal to seek affordable housing on sites of below 10 dwellings. As you will be aware, the Reading Borough Local Plan seeks an affordable housing contribution on all sizes of sites due to the exceptional pressures on affordability in the local area, and this will no doubt equally apply to West Berkshire. It is for WBDC to determine where the threshold for affordable housing provision should be based on local evidence, but as a general comment based on our experience, sites of 1-4 dwellings tend to have fewer viability issues in meeting policy requirements than sites of 5-9 dwellings, and WBDC may wish to consider seeking affordable housing contributions from all sizes of site. It is also worth noting that it is often very difficult to secure on-site provision below 10 dwellings due to the difficulties in finding a Registered Provider willing to take these units on, and WBDC may wish to reflect that a financial contribution on smaller sites is likely to be more achievable in most cases.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rectory Homes Ltd
Consultee Full Name	Steven Kerry
Consultee Organisation	Rectory Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS759
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	02/03/2023 10:09:00
Attached Files	Rectory Homes REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<i>[For full response see attached document]</i> The Policy does not accord with paragraph 64 of the NPPF which directs that affordable housing should not be sought on schemes of less than 10 dwellings if located outside of the designated rural areas. It is therefore unsound. It should be made clear within the policy text that part b) of Policy SP19 only applies to development schemes on sites within the designated rural areas such as AONBs.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gleeson Strategic Land Ltd
Consultee Full Name	Mr Peter Rawlinson
Consultee Organisation	Gleeson Strategic Land Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1123
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:40:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	No

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The Local Plan at paragraph 6.83 sets out that there is a high need for affordable housing across the District with a net affordable and social rented housing need equivalent to 330dpa. Based on an overall housing target of the higher range at 538dpa the affordable need represents 61% of the total housing target. The affordable housing percentage being sought by the Council is 30% on previously developed land, 40% on greenfield land and 20% for developments of between 5 and 9 dwellings. This means the affordable need will not be met. Accordingly the Council should increase the overall housing target so that the delivery of the much needed affordable homes also rises.</p> <p>To summarise the above points, Gleeson Land supports the overall intentions of the Local Plan Review to deliver sustainable development for the district, the settlement hierarchy and the spatial strategy. However, it is considered that there should be a requirement for an earlier review of the Local Plan should any changes arise in the AWE Burghfield and AWE Aldermaston DEPZ's or the capabilities of the Emergency Planning Services that may change the acceptability of new residential development in areas currently covered by the DEPZ. In addition the housing target should be more clearly defined at the upper end of the given range. It should be clear throughout the whole Plan that the housing target is for 9,146 dwellings (538dpa), plus the 230 dwellings of unmet need from Reading Borough Council. This unmet need should be provided for in new site allocations now, rather than being left for a later review. Serious consideration should also be given to increasing the overall housing target further to support the delivery of more affordable homes given the very high need for such homes.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1740
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	5.4 Policy SP19 'Affordable Housing' – We support the re-wording of the policy from the Regulation 18 stage, to ensure the care homes (use class C2) are considered as part of the affordable housing mix on a case-by-case basis.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd

Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1368
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	This policy has been amended to state that viability assessments must be publicly available. The information in viability assessments can often be commercially sensitive and therefore this amendment should be removed, or amended to say that a summary must always be made publicly available. The supporting texts states that the Council will require a review mechanism to enable the Council to reassess viability over the lifetime of the development; this requirement is not reasonable and in any event would be difficult to monitor/enforce.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1526
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	[For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes] Affordable Housing The HNAU sets out a need for 330 affordable dpa. Given that the Council's overall housing requirement (which takes into account all types of housing) is 538 dpa, the requirement for affordable homes makes up approximately 60% of the overall requirement. 330 dpa over the 17-year plan period equates to a requirement for 5,610 affordable homes. Draft LPR Policy SP19 (Affordable Housing) requires affordable housing to be delivered on site for all development sites of 5-9 dwellings (20% provision) and all development sites of 10+ dwellings (30% provision for previously developed sites and 40% for greenfield sites). Assuming a 'best-case' scenario, a crude calculation confirms that these sites would theoretically yield only 2,934 affordable units, a shortfall of 2,676 against the need identified. In reality, the actual position will likely be worse, with some sites unable to deliver affordable units, for example, due to viability constraints and/or financial contributions being provided in lieu of on-site provision. Many sites will also not be required to deliver the maximum 40% affordable housing provision sought in line with draft Policy SP19.

	Croudace therefore believes there is a clear case to request the Council to increase the housing requirement, at least to ensure that a greater proportion of affordable housing needs as identified within the Council's evidence base can be met. If the Council does not seek to adjust the housing requirement accordingly, Croudace cannot consider it to be 'positively prepared'.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1687
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	No

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The policy sets out a variable policy reflecting the different vitality between green field development and previously developed land (PDL). In addition, the Council is also requiring sites of between 5 and 9 to provide affordable housing.</p> <p>Whilst the HBF agrees with the Council with regard the use of a variable approach we are concerned that the rate applied to PDL sites is, as noted in paragraph 3.1.16, is at the upper end of what is viable. Whilst we note the Council's comments in the Viability Assessment that only 3 sites out of the 44 that have come forward in the last 7 years have failed to meet the affordable housing requirements this did not include requirements for 10% BNG and net zero carbon emissions. These costs will place more pressure on development and in particular will affect PDL sites where existing use values are generally assumed to be higher than on green field sites. The evidence indicates that 30% affordable housing on many such sites will be unviable or marginal and as such a lower overall requirement would be ensure more sites come forward without the need for negotiation.</p> <p>If the Council do not consider a change to be necessary, it should be more encouraging of development that can't viably deliver affordable homes. Whilst we recognise that paragraph 58 states that these should only be in exceptional circumstances it is apparent from the evidence that these circumstances are not exceptional but will be relatively common. Therefore, we would suggest that the Council takes a more supportive approach in this policy to negotiation in recognition of the evidence.</p> <p>Point b in the second paragraph of the policy sets out the Council's intention to require a financial contribution for affordable housing on sites of 5 and 9 dwellings. Paragraph 6.75 indicates that the Council are aware that paragraph 64 of the NPPF only allows for contributions from such sites in designated rural areas, yet it would appear from the policy that they are requiring contributions for affordable housing from all sites delivering 5 to 9 homes regardless of where these are located. The justification for this position appears to be that as 74% of the Borough is in an AONB such an approach is considered to be</p>

	<p>reasonable. If the Council's intention is that this element of the policy is only relevant to rural areas, then this should be expressly stated in the policy.</p> <p>If it is the Council's intention that all sites of between 5 and 9 should provide 20% affordable housing, then the HBF consider this policy to be unsound. It is worth noting why the Government introduced this particular policy. The Ministerial Statement is clear that the reason for introducing this policy was to "ease the disproportionate burden of developer contributions on small scale developers". This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments. These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF shows that over the last 30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive terms for project finance, have led to a long-term reduction of total SME house builder numbers by about 70% since 1988. The Government is very anxious to reverse this trend and increase the number of small businesses starting up and sustaining this activity. Improving business conditions for SME home builders is the key to long-term supply responsiveness.</p> <p>Therefore, the HBF consider it essential that the Council amend the policy to clearly state that only sites of 5 to 9 dwellings in designated rural areas are required to deliver affordable housing.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	To represent the views of our members
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1424
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type	Web

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	This Policy states that 'affordable homes will be built to net zero carbon standards to help meet objectives on sustainability and climate change'. There is a risk that this is interpreted as only being net zero during the building of the property; we believe that net zero should be the standard for the whole life of the structure and suggest that this section is reworded accordingly.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Churchill Retirement Living Ltd (Represented by Planning Issues Ltd)
Consultee Full Name	Churchill Retirement Living Ltd
Consultee Organisation	Churchill Retirement Living Ltd
Agent Full Name	Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Comment ID	PS955
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:19:00
Attached Files	Churchill Retirement Living Viability Assessment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p><i>[Attached Churchill Retirement Living Viability Assessment]</i></p> <p><i>Policy SP19: Affordable Housings</i> which advises that on sites of 10 dwellings or more there will be a 30% affordable housing requirement on previously developed land, and a 40% requirement on Greenfield land. .</p> <p>The wording of <i>Policy SP19</i> makes it clear that a non-policy compliant level of affordable housing will only be allowed in exceptional circumstances ‘...<i>The levels set out above represent the default position and a lower provision of affordable housing should not be sought, other than in exceptional circumstances and where fully justified by the applicant through clear evidence set out in a publicly available viability assessment.</i></p> <p><i>If a lower provision of affordable housing is sought in exceptional circumstances, a review mechanism will be required to ensure that if viability improves during the lifetime of the development project, additional affordable housing, up to the levels specified in this policy, is provided.</i></p> <p>It is clear from the wording of the policy and its justification that the Local Authority is cognisant of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF. Given the Council’s stance towards developer contributions and affordable housing, we find aspects of the evidence base underpinning these policies to be of concern.</p> <p>The affordable housing targets set out in <i>Policy SP19: Affordable Housing of the West Berkshire Council Local Plan Review</i> (Regulation 19) consultation are informed by the <i>West Berkshire Council – Viability Assessment Update</i> (VA) by Dixon Searle Partnership (Autumn 2022).</p> <p>We note that the VA has assessed the viability of older persons’ housing typologies, which is welcomed. In reviewing the methodology for assessing specialist older persons’ housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although a number do not. Our concerns are that the Viability Assessment has overplayed the viability of older persons’ housing.</p> <p>Mindful of the guidance in the PPG that is the responsibility of site owners and developers to engage in the Plan making process. Churchill Retirement Living have provided commentary and supplemental evidence on the viability assumptions used in the viability appraisals for retirement living housing typologies in the VA.</p> <p><i>[Churchill Retirement Living have provided commentary, supplemental evidence and their own viability appraisal on this policy in a separate document entitled ‘Review of Local Plan Viability Assessment Retirement Living Housing’.]</i></p> <p>Conclusions</p> <p>Churchill Retirement Living are strongly of the view that it would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at the very least in urban areas. This approach accords with the guidance of the PPG which states that ‘Different (affordable housing) requirements may</p>

	<p>be set for different types or location of site or types of development' (Paragraph: 001 Reference ID: 10-001-20190509).</p> <p>The guidance in the NPPF and the PPG is that the role for viability assessment is primarily at the Plan making stage:</p> <p><i>Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force (paragraph 57.)</i></p> <p>Council Members, Officers and the general public will assume that applications for sheltered or extra care housing will be able to support a policy compliant level of affordable housing. This would however be wholly at odds with the viability evidence underpinning the Local Plan.</p> <p>The requirement for affordable housing contributions from specialist older persons' housing typologies is therefore speculative rather than based on the evidence presented. The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.</p> <p>We therefore respectfully request that a new subclause is added stating that:</p> <p><i>Specialist older persons' housing will be subject to a nil affordable housing requirement on brownfield / urban sites and a 40% affordable housing requirement on greenfield sites.</i></p> <p>To that end, we would like to draw the Council's attention to Paragraph 5.33 of Policy HP5: Provision of Affordable Housing in the emerging Fareham Borough Local Plan which advises that:</p> <p><i>5.33 ... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.</i></p> <p>A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the District, helping to meet the diverse housing needs of the elderly. The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bloor Homes (Represented by White Peak Planning Ltd)
<p>Consultee Full Name</p>	Bloor Homes

Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1324
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	No

* No	
Please give reasons for your answer	Object. The policy wording is not justified or consistent with national policy. Bloor Homes fully supports the Council's objectives for delivering affordable homes given that we are currently experiencing a housing crisis for many thousands of people across the district and the UK who cannot afford to own or live in their own home. In relation to the requirement for affordable homes to be built to net zero carbon standards, the policy should align clearly with Policy DM4.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Affordable homes will be built <u>in accordance with the requirements of Policy DM4</u> to net zero carbon standards to help meet objectives on sustainability and climate change'. 'Affordable homes will be built to help meet objectives on sustainability and climate change'.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Yes. To explain the adverse impact of the policy requirements on the delivery of affordable housing.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1588
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	08/03/2023 16:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<i>*Late Response*</i> Page 69 Missing a definition of Affordable Housing.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS1811
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park South (SPS)</p> <p>Affordable Housing Needs</p> <p>Planning Practice Guidance paragraph 2a-024 states:</p> <p><i>“... An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”</i></p> <p>The West Berkshire Housing Needs Assessment Update (WBHNAU) shows a net annual need for 330 rented affordable homes and a net annual need for 367 affordable home ownership homes in the District. Therefore, the total affordable housing need of 697 homes per annum is in excess (130%) of the total housing provision proposed in the dWBLP.</p> <p>Despite the level of need being high, the WBHNAU considers that this would not necessarily point to any requirement for the Council to increase the Local Plan Review housing requirement above that suggested by the SM.</p> <p><i>“The link between affordable need and overall need (of all tenures) is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home)”</i></p> <p>The WBHNAU considers that the affordable housing need arising from newly forming households is already accounted for in the output from the demographic modelling (i.e. the Standard Method), and are therefore already included in the overall housing need figures.</p> <p>Whilst it is accepted that the relationship between affordable housing need and overall housing need is complex and that there is no simple arithmetical means of linking the two, the PPG is clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. Furthermore paragraph 20 of the NPPF is clear that strategic policies should make sufficient provision for affordable housing.</p> <p>The WBHNAU erroneously conflates the overall housing needs of the area with that of the need for affordable housing. Whilst it is true that a proportion of households in need of affordable housing are already accounted for in the demographic modelling of the SM and therefore it is not necessary to deliver more homes than suggested by the SM, this misses the fact that the WBHNAU identifies that there is a greater need for affordable homes than there are for all homes according to the standard method. Accordingly, even if all of the homes proposed were delivered as affordable homes there would still be a shortfall. It also misses the fact that a proportion of the housing delivered will not be affordable homes and so will not respond to the needs identified and that accordingly, it will be necessary to provide for an even greater number of homes to meet the need for affordable housing as set out in the Planning Practice Guidance.</p> <p>Donnington New Homes acknowledges that the Council may not be able to meet the affordable housing needs in full. However, the disparity between what is needed and what is planned to be delivered indicates a clear need for an uplift in the overall housing requirement to ensure a sufficient provision of affordable housing in accordance with paragraph 20 of the NPPF.</p>

	The Council acknowledges the upper target of the housing provision does not constitute a ceiling or cap to development (draft Policy SP12). An uplift in the housing provision for affordable housing needs would therefore not be at odds with the development strategy of the Council.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincent's Lane (Represented by TOWN)
Consultee Full Name	Pincent's Lane
Consultee Organisation	Pincent's Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1361
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincent's Lane) Full Rep.pdf TOWN (Pincent's Lane) App 7.Affordable housing Statement.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes	

* No	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p>West Berkshire is not an affordable place to live, and the level of affordability is becoming worse – in both absolute and real terms. The median house price to residence-based earnings ratio⁷ (see ONS) has risen from 7.85 to 10.94 between 2010 and 2021 – a rise of 39% in comparison to a rise for England as a whole of 33% (to 8.92).</p> <p>Neither the policy nor the supporting text recognises the really urgent need for the delivery of more affordable housing. There is no recognition that of the failure to deliver the level of affordable homes promised in the 2012 Core Strategy and of the consequences of this failure. There is no reference to any intention to seek early delivery of affordable housing and to do so in locations close to areas of clear demand. Thus no affordable targets or requirements are set in the context of the settlement hierarchy. This is all required to ensure consistency with NPPF 11 a&b, 61-63.</p> <p>Tetlow King (TK) have produced an Affordable Housing Statement which is submitted as Appendix 7 to these representations.</p> <p>The TK statement notes the following:</p> <p>6.3 The 2022 HNA [Housing Needs Assessment] also sets out the affordable housing need for the Eastern Sub-area, identifying a total net affordable housing need of 138 affordable dwellings per annum over the 18-year period from 2021 to 2039.</p> <p>Furthermore, not only have nil affordable homes been delivered in Tilehurst Parish since 2018-19 (figure 3.5) but there is a shortfall of 83 affordable dwellings from the first year of the wider 2022 Housing Needs Assessment, meaning that overall (paragraph 6.7) “the number of affordable homes the Council will need to complete increases to 155 net affordable homes per annum for the period 2022/23 to 2026/27.”</p> <p>And indicators of housing need point towards what TK identify as ‘an affordability crisis’ across West Berkshire and in particular in the Eastern Area around Tilehurst, as (paragraph 6.9):</p> <ul style="list-style-type: none"> • Of the 651 households on the Housing Register at 31st March 2022, 175 households specified a preference for an affordable home in Tilehurst; this represents 27% of the entire housing register.

	<p>Finally, TK conclude:</p> <p>6.1 Given the recognised shortfall in affordable housing across West Berkshire and the Eastern Sub-area more specifically, the allocation of additional development sites within the Eastern-sub-area would contribute significantly towards addressing a key corporate priority of delivering more affordable homes.</p> <p>6.2 By contrast, there are opportunities to secure more affordable housing, for example additional allocations and the achievement of higher rates of affordable housing on viable development sites. These include forthcoming and deliverable sites such as Land East of Pincents Lane (TIL13).</p> <p>6.3 The importance of such allocations is demonstrated by the lack of housing allocations in the Tilehurst Civil Parish, including the availability of suitable development sites within the Eastern Area that are not restricted by constraints including the safeguarding zones for the Atomic Weapons Establishments at Aldermaston and Burghfield, or containing land (in part and full) that are in Flood Zones 2 and 3.</p> <p>Delivery of Affordable Housing in Reading BC area</p> <p>The Reading BC Annual Monitoring Report notes that in total 178 net affordable housing completions were delivered in 2021/22 (footnote 8). Paragraph 8.13 goes on to state:</p> <p>8.13 The amount of affordable housing delivered this year is significantly higher than 2019-20 (80) and 2020-21 (54), and is the highest level delivered since 2013. This is related to the progress with particular large developments where a substantial proportion of their affordable delivery has come in this year. It is expected that affordable housing delivery will continue to be relatively strong in coming years in line with high levels of overall delivery, albeit still well below the identified level of affordable housing need of 406 per year over the Local Plan period.</p> <p>As of the end of the 2021/22 financial year, there were 3,187 households on the Housing Waiting List for Reading (footnote 9). Even if no further households came on to the list in the meantime, and the 2021/22 high level of affordable housing completions were to be maintained, it would take a further 18 years – a further two decades - to clear this backlog.</p> <p>With this scale of affordable housing need in both Reading and WBC, it puts additional pressure on the wider housing market, including private rental in particular. The recognition of this need and an identification of how it is to be met in each part of the settlement hierarchy is required in the strategic policies of the plan. This would give rise to the need to increase the allocation of additional sites in the Eastern Area, adjacent to the main urban area such as that proposed at Pincents Lane site TIL13, would assist in delivering additional much-needed market and affordable housing to address these pressures.</p> <p>In these circumstances, the strategic housing policies of the plan are unsound and are failing to identify and respond to local housing needs in the location where these needs arise. More allocations are required.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Full Rep • Appendix 7 - Tetlow King report: Affordable housing representation
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The requirement to allocate more sites in the Eastern Area would address many of these challenges to soundness. Whilst it is acknowledged that some constraints do exist, there are sites which are recognised as achievable and deliverable in the Council's evidence base supporting the LPR. Prime amongst these is site TIL13 at Pincents Lane (see overleaf). Site TIL13 has a long planning history. By common consent, the problems with the 2011 appeal scheme have been resolved and no technical obstacles exist to development of the site for a scheme of up to 165 dwellings. By the LPA's own assessment, the concerns – and the reasons for not proposing it for allocation – are entirely "political". No one would deny the validity of elected members making political choices where real choices exist, but the fact is that not allocating the site would leave the LPA without a single significant contribution to offer to meet either its own housing need in the Eastern Area or that arising from Reading, of which the Area is functionally part. The site should therefore be allocated.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1431
Chapter / Policy / Appendix Number	Policy SP 19
Chapter / Policy / Appendix Title	Affordable Housing
Order	66
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? -	Yes

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Support the policy
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes

Policy SP 20 Strategic approach to employment land

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bracknell Forest Council
Consultee Full Name	Bracknell Forest Council
Consultee Organisation	Bracknell Forest Council
Agent Full Name	
Agent Organisation	
Comment ID	PS220
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 12:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It is not clear from the LPR what the quantum of unmet need is over the Plan period, although your email of 13th January 2023 states that it is now 50,816sqm office floor space and 32,709sqm of industrial floor space. The LPR also refers to a lack of suitable sites, and that the District is heavily constrained (paras. 7.7 and 7.9).</p> <p>BFC is experiencing similar issues to West Berks and at the base date of our Local Plan had an unmet need for industrial and warehousing floorspace (former B1c, B2 and B8 uses). At the base-date of the BFLP the need was for 48,875m2 industrial/warehousing, and 19,125m2 of office floorspace (the latter of which could be met in full). However, the Inspectors requested an update on changes that had occurred since the base date of the Plan. This found that at 31st March 2022, the remaining need to 2037 for industrial/warehousing had decreased to 21,550m2 but that office floorspace needs had increased to 72,365m2. The increase in office floorspace need is due to the Borough continuing to experience the demolition or change of use of existing office buildings.</p> <p>A consequence of the content of the Inspectors' post hearings letter, is that the unmet need for industrial/warehousing increases to 36,550m2 (since the suggested Main Modification will mean that the 15,000m2 of floorspace that was to contribute to meeting needs will be removed with the deletion of the allocation at Jealott's Hill). Prior to submission of the BFLP, BFC undertook Duty to Co-operate discussions with surrounding LPAs in August 2021 asking for assistance in helping to meet its industrial unmet needs. No LPA was in a position to assist given limited land availability and existing constraints to development.</p> <p>We advised in an email in September 2022 that BFC was regrettably unable to assist with helping your unmet need. This position has not changed. Therefore in response to your formal Duty to Cooperate request for assistance received on 13th January 2023, Bracknell Forest remains unable to assist with meeting any of West Berkshire's employment land or floorspace requirements. It is noted (para. 7.9) that the Plan includes a commitment to undertake an early review on employment matters.</p> <p>In relation to retail need, an update of the evidence has not been undertaken due to the challenges which have arisen as a result of Covid and Brexit, and that a commitment has been made to undertake an early review of the Plan on this matter (para. 7.32). Given the recent changes to the use class order (and new Use Class E), a light touch review of retail needs would have been helpful to inform the LPR. (Bracknell Forest commissioned a Retail Advice Note in 2022 as part of evidence base of the BFLP, which took account of the Western Berkshire Retail and Commercial Leisure Assessment from 2016). As it is not known if there is any unmet need for retail, BFC is unable to comment on any implications at this stage.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS171
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It is inferred from the text that the Council plans the use of DEA's to restrain the currently malign use of Permitted Development Rights to convert business premises to residential use in disregard of local plans. If correct, that intention is strongly supported.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Crest Strategic Projects (Grazeley) (Represented by Savills)</p>
<p>Consultee Full Name</p>	<p>Crest Strategic Projects (Grazeley)</p>
<p>Consultee Organisation</p>	<p>Crest Strategic Projects (Grazeley)</p>
<p>Agent Full Name</p>	<p>Abigail Heath</p>
<p>Agent Organisation</p>	<p>Savills</p>
<p>Comment ID</p>	<p>PS467</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 20</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Strategic approach to employment land</p>
<p>Order</p>	<p>69</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	<p>E-Mail</p>

* Unknown	
Response Date	01/03/2023 11:50:00
Attached Files	PS467 Savills (Crest Strategic Projects Grazeley) Appendix 1.pdf PS467 Savills (Crest Strategic Projects Grazeley) Table 1 extract.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>It is considered that the plan should take into account industrial and logistics need of the in the Berkshire Functional Economic Market Area ('FEMA') and wider region. Justification for this stance is set out in our appended representation letter titled 'Grazeley I&L West Berkshire Reps Letter' which provides a brief background of the national policy legislation position and then the regional and local evidence base, and sets out how our Site at Grazeley can contribute to this regional need.</p> <p>Representation Letter:</p> <p>This letter provides representations on behalf of Crest Nicholson Partnerships and Strategic Land ('CN') to West Berkshire Council on the Proposed Submission (Regulation 19) Consultation in relation to the land at Grazeley ('the site') for industrial and logistics (I&L) development.</p> <p>The site lies immediately to the south of junction 11 of the M4 and continues to extend south, with the A33 broadly forming the eastern boundary, and the railway line defining the western boundary. In the previous</p> <p>Wokingham Regulation 18 Consultation in 2020, Grazeley Garden Town ('GGT') was identified as a preferred option for strategic residential development as a 'Garden Town' of 15,000 houses. As you will be aware subsequently to this decision, a change in legislation resulted in the redetermination and expansion of the</p>

Urgent Action Area and the Detailed Emergency Planning Zone ('DEPZ') around AWE Burghfield, leaving Grazeley Garden Town no longer achievable. As a result, CN has been assessing alternative appropriate land uses in the northern part of the site adjacent to Reading and the M4. In light of this, CN promoted the site for industrial and logistics development and submitted representations to Wokingham's Regulation 18 Consultation in January 2022. It is considered that as the site is located within a strategically important economic area, the site could deliver employment land of a scale which would benefit the wider sub region including adjacent authority areas, such as West Berkshire, in terms of job creation and economic outputs.

Development on land at Grazeley will be guided by overarching placemaking principles that ensure good quality design, mitigates the impacts of climate change and which helps build communities that are resilient to climate change and contribute to healthy living. Tackling the impacts of climate change is one of the key foundations of Crest Nicholson's business strategy, they continue to embed responsible practises throughout operations and development designs. Crest Nicholson are committed to reducing carbon emissions and waste and are constantly innovating to find ways to reduce the impact our developments have on the environment.

In January 2023, Crest Nicholson became the first UK housebuilder to have its science-based net-zero target approved by the Science Based Targets Initiative (SBTi). Crest Nicholson is committed to reaching net zero greenhouse gas emissions across the value chain by 2045 and committed to reduce waste and assessing carbon emissions associated with the delivery of development. Crest Nicholson has also received recognition for its commitment to positive placemaking and tackling climate change through a number of initiatives and awards:

- Maintained its place on the FTSE4Good Index (2022)
- Awarded a B Score in the CDP (formerly the Carbon Disclosure Project) in 2022
- Named as one of the Financial Times' European Climate Leaders in 2022
- A proud Signatory of the Business Ambition to limit global temperature rise to 1.5°C
- First UK housebuilder to have its science-based net-zero target approved by the Science Based Targets initiative in 2023

The National, Regional and Local Policy Context

National Evidence Base

The UK planning system, via the allocation of enough employment land in the right locations, is critical to facilitating the sector's growth.

The National Planning Policy Framework (NPPF) requires local planning policies to identify sites and/or establish criteria to enable anticipated employment needs to be met [Paragraph 82]. In 2019, a revision to the NPPF introduced a specific requirement for planning policies and decisions to reflect the specific locational requirements of different employment sectors including logistics. This requirement remains within the 2021 NPPF which "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration". The same text is carried over into the draft consultation NPPF published December 2022 at Paragraph 84. This provides a clear and positive policy context for the preparation of local plans.

Paragraph 83 goes on to explain that policies and decisions should recognise and address the specific locational requirements of particular sectors, more specifically: "Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations."

The specific mention of storage and distribution operations is long overdue and provides recognition of the recent growth in this sector, which underpins its strategic importance as a consideration within the plan making process. Indeed, to be one of only three sectors explicitly mentioned in the 'Building a Strong, Competitive Economy' chapter is testament to the role that logistics could play in the future economy.

The National Planning Policy Guidance (NPPG) at Paragraphs 025 [Ref ID: 2a-025-20190220], sets out that strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions.

The NPPG notes various methods as to how strategic policy making authorities can prepare and maintain evidence about business needs. Firstly, it is noted that "in gathering evidence to plan for business use, strategic policy making authorities will need to liaise closely with the business community, taking account of the Local

Industrial Strategy, to understand their current and potential future requirement" [Paragraph: 026 Reference ID: 2a-026-20190220]. During this process the NPPG sets out that authorities must consider the following:

- "the best fit functional economic market area;
- the existing stock of land for employment uses within the area;
- the recent pattern of employment land supply and loss;
- evidence of market demand – sourced from local data and market intelligence;
- wider market signals relating to economic growth, diversification and innovations; and
- any evidence of market failure" [Paragraph: 026 Reference ID: 2a-026-20190220].

Paragraph 27 of the NPPG indicates four possible methods to estimate future needs:

- 1) "Sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)
- 2) Demographically derived assessments of current and future local labour supply (labour supply)
- 3) Analysis based on the past take-up of employment land and property and/or future property market requirements (past take-up)

4) Consultation with relevant organisations, studies of business trends, and understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics” [Paragraph: 027 Reference ID: 2a-027-20190220].NPPG, Paragraph: 031 Reference ID: 2a-031-20190722 sets out the following:

“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:

- Engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
- Analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;
- Analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and
- Engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.
- Strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).”

Economic need is not as prominent as housing need in the guidance, the latter being subject to a standard methodology with a series of unambiguous steps set out to establish the minimum annual housing need for each local authority area. There is specific reference to logistics and the preamble in the Guidance on this reiterates the “critical role” that logistics plays in “... enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities ...”, however the Guidance then fails to translate this sentiment into a clear and robust approach which ensures logistics needs are met.

Regional Evidence Base

The Berkshire FEMA – 2016

Nathanial Lichfield and Partners produced a study titled the Berkshire Functional Economic Market Area (‘FEMA’) in February 2016, on behalf of the Thames Valley Berkshire Local Enterprise Partnership (‘TVBLEP’) and the six Berkshire authorities of Bracknell Forest, Reading, Slough, West Berkshire, Windsor and Maidenhead and Wokingham to investigate economic relationships, linkages and flows which characterise the sub-regional economy. The Berkshire FEMA, is comprised of three core FEMAS that represent a ‘best fit’ within local authority boundaries, the ‘Central Berkshire FEMA’, ‘Western Berkshire FEMA’ and ‘Eastern Berkshire FEMA’.

A further report was commissioned to consider the objectively assessed economic development needs of the Western Berkshire FEMA – The Economic Development Needs Assessment (EDNA) (2016).

It is noted that the site falls within the Central Berkshire FEMA and the draft Regulation 19 Plan to the area within the Western Berkshire FEMA, however as set out on page 12 “it should be recognised that the boundaries of these areas are porous given the different layers of inter-relationship that exist between each area as well as across the TVBLEP area overall. It is important to continue to recognise these relationships in Duty to Cooperate terms”.

The purpose of the EDNA studies was to identify the objectively assessed economic development needs for the authorities within each FEMA over the 2013-36 period. Land and floorspace requirements were quantified, as well as a qualitative assessment of future change for individual employment sectors and uses. It is noted that West Berkshire set out that the outputs of the EDNA (2016) study are not being relied upon for the LPU due to the more recent data provided in the Employment Land Review (‘ELR’) for West Berkshire (2022) despite it having a more robust baseline as it considers the wider FEMA sub-region.

The EDNA concludes that under the ‘labour supply’ method scenario in the Western Berkshire FEMA has a minimum industrial need of 154,650 sqm or 15.5 ha.

Local Evidence Base

Employment Land Review (ELR) West Berkshire – 2022

The ELR was undertaken in December 2022 by Stantec and Aspinall Verdi to assess the future employment land and floorspace requirements in West Berkshire, based on jobs forecasts and a specific scenario that relates to the calculation of Local Housing Need. The assessment aligns future jobs forecasts with population growth. The study considers net and gross demand, gross supply and the floorspace requirements across office and industrial uses needed to support economic growth in the borough over the plan period. ‘Office’ refers to B1(a) and B1(b), and ‘Industrial’ refers to both warehousing and industrial (B1(c), B2 and B8) uses because in practice these activities are interchangeable and routinely require/occupy the same type of space.

The ELR sets out a gross demand (sqm GIA) of 154,976 between 2022 and 2039, a total supply (sqm GIA) of 63,867 is noted thus leaving a shortfall of 91.109 sqm GIA or 23 ha across the plan period (paragraph 5.13) when utilising the labour supply method. It is considered that this requirement better reflects market trends as set in Section 3, and as such should be planned for as the minimum requirement opposed to the 15.5 ha required in the Western Berkshire FEMA 2016 report.

Draft policy SP20 'Strategic Approach to Employment Land' sets out that through the local plan review the Council will seek to facilitate the growth and forecasted change of business development over the plan period by promoting the supply of industrial space across the District to meet the identified shortfall of 23 ha based on the labour supply method within the ELR as a minimum.

Industrial and Logistics Market

Savills research indicates that the I&L sector continues to break records as investment volumes top £4.7 billion in 2020. **The sector now employs around 3.8 million people in England and represents 14% of the total economy in GVA terms, or £232 billion** (footnote: ONS (2021), Workforce Jobs by Regions and Industry – Jobs in Manufacturing, Transportation and Storage for March 2020; ONS (2021) – England, Regional Gross Value Added (Balanced by Industry – GVA for Manufacturing, Transportation and Storage in 2019 – England). Arguably the most important characteristic of the sector is its above average productivity growth estimated to be 29% between 2025-2039 compared to 18% for all other sectors.

The I&L sector is facing an era of unprecedented change. The past decade has seen the sector undergo a remarkable transformation, reshaping operating models and occupier requirements in ways that are only starting to become recognisable as an industry-wide phenomenon. Logistics uses in particular have shown strong performance for a number of years, but the Covid-19 pandemic has exacerbated existing trends with primary growth drivers including online shopping, UK freight volume and increased near-shoring and onshoring.

Combined, these growth drivers are resulting in unpreceded demand for I&L premises. Over the course of 2021 Savills Big Shed Briefing (footnote: Savills Research (2022) Big Shed Briefing (January 2022) Available at: https://www.savills.co.uk/research_articles/229130/323880-0 - the Big Shed Briefing focuses on I&L premises above 100,000 sqft) found that gross take-up had reached a new annual record of 55.11 million sq ft – 86% above the annual average. This trend of increased update has continued, with the Savills Shed Briefing (footnote Savills Research (2022) Big Shed Briefing (July 2022) Available at: https://www.savills.co.uk/research_articles/229130/330469-0 - Spotlight: Big Shed Briefing) mid-year 2022 report noting a new H1 record of 28.6 sq ft surpassing last year's total of 24.5 sq ft and exceeding the H1 annual average by 90%. The number of transactions nationally was 220, surpassing the previous record of 172 in 2020 (footnote: bid).

A detailed analysis of the I&L market is provided at Section 3 of CNs appended representation to the Regulation 18 Wokingham Borough Council consultation.

The Opportunity

As set out in CN's representation to Wokingham's Regulation 18 Consultation in January 2022 consultation, the site at Grazeley is considered optimal for delivering I&L need across the Berkshire FEMA.

A summary of the suitability of Grazeley is provided in the table below which sets out the criteria that Savills believes to be the most influential when determining the site suitability for I&L and the justification for these criteria. Subsequently, it assesses the Grazeley site against the criteria. Savills considers that the site performs well against all criteria and this is considered highly suitable for I&L.

It is noted that the existence of a DEPZ should not be a reason for assuming any development is inappropriate as the ONRs consultation processes ensures any proposed development would be judged on its own merits taking into account the details of the proposal and the effects the development would have on the on-site and off-site plans. Examples of I&L development in a DEPZ exist and include the recent outline planning permission at Blacks Lake Track Racing, Paices Hill, Aldermaston (Application No. 20/02527/OUTMAJ) for up to 15,917 sqm of flexible commercial floorspace for B8 (Storage or distribution).

Table 1 Important I&L Attributes <see appendix>

On review of the above, it is considered that Grazeley is exceptionally well placed to cater the sub-regional employment land needs because of its location on the strategic road network and public transport links to Reading and beyond.

The development of land at Grazeley will be established on a robust and strong vision, with a commitment from Crest Nicholson as a development partner, to create a high-quality, distinctive and sustainable new development with a lasting legacy. The vision for development will focus on key design principles:

- A robust, clear, and logical movement framework, based on walkable neighbourhoods, that provides direct and easy to understand routes to facilities and services is a key ingredient of a successful and sustainable place.
- Providing opportunities for healthy living, personal well-being, investing into a positive collaboration process and delivering a balance of uses to create a long-term sustainable place will be fundamental to the legacy of Grazeley.
- Understanding the site and its surroundings to create a response design will create a place embedded in its locality and place.
- Quality design is fundamental and will be delivered through excellent public spaces, a clear hierarchy of attractive and harmonious streets that are at a human scale and respect the local character.

Crest Nicholson is committed to placemaking and creating attractive communities. As such, Crest Nicholson believe that land at Grazeley should be considered positively for development.

Summary

This letter responds to the West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation and sets out the availability of the land at Grazeley, Wokingham on behalf of CN for I&L development which could contribute towards the wider FEMAS need including that in West Berkshire.

The letter provides a brief background of the national policy legislation position and then the regional and local evidence base. The Western Berkshire FEMA (2016) indicates an industrial land need of 15.5, ha whereas the

	<p>Western Berkshire ELNA (2022) indicates a need of 23 ha across the plan period. It is the later of these figures that makes up the minimum demand figure set out in draft Policy SP20 of the Regulation 19 Plan. As set out previously CN support the use of this figure as a minimum as it is considered to be more robust due to it being based on up to date statistics reflecting the recent market trends.</p> <p>The trends of I&L are them summarised, demonstrating the probability of the sector and the positive future trends due to factors such as online shopping, Covid-19 and BREXIT. This is evidenced by the following ONS finding: the sector now employs around 3.8 million people in England and represents 14% of the total economy in GVA terms, or £232 billion [ONS Annual Accounts].</p> <p>The opportunity is then presented which explains why CN considers that the land at Grazeley the ideal location to not only help Wokingham but the wider Berkshire FEMA to meet their industrial land requirements. Due to the fact that the site poses the attributes we consider are required to produce a successful I&L site (e.g., motorway access) set out in Table 1.</p> <p>Further information regarding the proposed I&L development at Grazeley can be found within Appendix 1 'Response to Wokingham's Regulation 18 Consultation January 2022' <See attached></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	As above, it is considered that the Local Plan should address regional industrial and logistics needs. Justification for this is set out in our appended representation letter titled 'Grazeley I&L West Berkshire Reps Letter'.
<p>4. Proposed Changes</p>	It is considered that policy SP20 should be amended to reflect FEMA and regional need and dictate that need can be achieved through sites outside the West Berkshire Council authority area. Please refer to provided representation letter titled 'Grazeley I&L West Berkshire Reps Letter' for further justification.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Aldermaston Parish Council
<p>Consultee Full Name</p>	Aldermaston Parish Council
<p>Consultee Organisation</p>	Aldermaston Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS434
<p>Chapter / Policy / Appendix Number</p>	Policy SP 20
<p>Chapter / Policy / Appendix Title</p>	Strategic approach to employment land
<p>Order</p>	69
<p>Submission Type</p>	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	27/02/2023 16:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Although no new Industrial land is proposed for the Parish of Aldermaston, (Policy SP-21) we are concerned that growth in our existing numerous industrial estates could lead to additional traffic on the already busy A340, which plays a key role in the evacuation route following an incident at AWE (A). APC will therefore continue its policy of Objecting to all developments that could increase HGV traffic on the A340 until our Conservation Area is bypassed. To that end, we are pleased to note that WBC has Refused planning application 22/02730/FULMAJ (expansion at Youngs Industrial Estate), stating in their Decision that "the proposal would represent an intensification of the commercial use of a site in a rural area" and that "There is insufficient information to demonstrate that the proposed development would not result in an increase in population within DEPZ. With no individual Emergency plan in place the proposal would have an adverse impact on the AWE Off-Site Emergency Plan due to distance meaning that evacuation after a period of shelter would be necessary, and in terms of recovery implications in the longer term."

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Test Valley Borough Council
Consultee Full Name	Test Valley Borough Council
Consultee Organisation	Test Valley Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS389
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 11:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? -	

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>With regard to your local plan consultation and further to your email request letter of 13 January 2023, which we note was also similarly sent to a number of other neighbouring local planning authorities within the counties of: Berkshire, Buckinghamshire, Hampshire, Oxfordshire and Wiltshire, this letter provides our formal response. We welcome opportunities to engage and collaborate with West Berkshire Council (WBC) on strategic planning matters, policies and cross boundary issues as relevant. We note that West Berkshire has a number of planning constraints which restricts potential site allocation options, particularly that 74% of the district is AONB.</p> <p>Our adopted Test Valley Borough Local Plan covers the period 2011 to 2029, and we are currently in the process of preparing a new Local Plan that covers the period 2020 to 2040. We undertook public consultation on our Regulation 18 (Stage 1) Draft Local Plan 2040 for Test Valley Borough earlier this year. TVBC will share information with WBC in due course on matters such as the proposed locations for housing and economic development, as we prepare our Regulation 18 (Stage 2) Plan for consultation timetabled for Quarter 3 of 2023, as relevant.</p> <p>As part of our evidence base we have the Economic, Employment and Commercial Needs (including Logistics) Study 2021, (Stantec), which was commissioned on a sub-regional basis by the Partnership for South Hampshire (PfSH) and extended to provide Borough-wide coverage of Test Valley. As this used a predominantly past trends based methodology to forecast future needs, an additional Test Valley Employment Needs Further Analysis Study 2022 (DLP) was also commissioned by the Council which is currently being finalised. The initial findings are that the economic relationship with West Berkshire is relatively weak and we are not in the same FEMA. A Test Valley Economic Assessment Study 2023 is also currently underway.</p> <p>We have considered your request regarding employment land needs, taking account of your current draft West Berkshire Local Plan Review 2022-2039 Proposed Submission (Regulation 19) Consultation and its associated evidence base and topic papers etc., as relevant. This has included specifically the content of: <i>Berkshire Functional Economic Market Study 2016</i> and the <i>West Berkshire Employment Land Review 2020</i> and <i>Addendum 2022</i>.</p> <p><i>Berkshire Functional Economic Market Study 2016</i></p> <p>This concludes that that Western Berkshire FEMA comprises West Berkshire district with the key centre of Newbury. This area is characterised by having a relatively self-contained Travel to Work Area (TTWA) and tends to operate within a westward facing commercial property market constituting a key node at the western end of the M4 corridor. Whilst there is some synergy in travel to work and property market</p>

terms between Newbury and Reading, these linkages are not considered sufficiently strong to include West Berkshire within a Central Berkshire FEMA.

The Newbury TTWA comprises the majority of West Berkshire, as well as parts of Wiltshire, Basingstoke and Deane and Test Valley. For Test Valley this is the northern most part of the Borough around Linkenholt, Vernhams Dean and Facombe which is very rural and within the AONB.

There is therefore not a strong commercial property market linkage with Test Valley and the Housing Market Area also suggests very limited overlap with Berkshire.

West Berkshire Employment Land Review 2020 and Addendum 2022.

Based upon the latest figures in the 2022 Addendum we note that there is deficit of 50,816sqm offices and 32,409sqm (9.4ha) industrial. It is not clear however whether these relate to Newbury or the edge of Reading.

The conclusions of the Addendum and considered relevant:

For offices, the overall balance is not a concern in the short term. In the medium to longer term, the gap should be filled by seeking to maximise the potential for new office provision through redevelopment schemes, of existing retail and offices uses within Newbury town centre. It could also be met through mixed use allocations to include an element of housing and employment. The floorspace requirement should be seen in the context of the whole plan period to 2039 and it be demonstrated how it could be accommodated with reasonable prospects of delivery.

For industrial, there is a pressing need to frontload the plan with a readily available pipeline of space. Therefore as much as possible of this overall need should be allocated on easily deliverable sites. There are a number of potential sites in the HELAA, but the majority of these are subject to constraints and policy considerations and none of these are in Newbury, which is an imbalance that should be addressed. If all other options fail to meet demand consideration should be given to providing new industrial floorspace as part of potential large housing allocations, albeit this would only deliver smaller and lighter units, but these are in demand, and viable in the East (Reading market area), although less so elsewhere.

Significantly, it does not recommend seeking to meet any shortfall outside of West Berkshire.

In conclusion, we are unable to assist in meeting your shortfall in employment land and floorspace. However, crucially taking account of the findings and recommendations of your evidence base we consider that in any event, for us to do so would not be an appropriate response or suitable solution in planning terms to meet your unmet employment land needs, given that we are within a different FEMA and there is a low level of economic interaction between West Berkshire and Test Valley, in both commuting/labour market terms and in the operation of the commercial land and property market. Any additional provision in Test Valley would not therefore be an appropriate alternative for your own local arising need which would otherwise have been accommodated within West Berkshire itself.

I confirm that the content of this response has been discussed with, and agreed by our Planning Portfolio Holder, Councillor Phil Bundy.

Notwithstanding this response on the specific issue of your shortfall in meeting employment land needs, we look forward to continuing our engagement on our emerging local plans. This letter should also be considered as our formal response to the West Berkshire Local Plan Review 2022-2039 Proposed Submission (Regulation 19) Consultation. We have no further comments.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Walker Logistics Ltd (Represented by Pegasus Planning Group Ltd)
Consultee Full Name	Philip Walker
Consultee Organisation	Walker Logistics Ltd
Agent Full Name	Jim Tarzey
Agent Organisation	Pegasus Planning Group Ltd
Comment ID	PS411
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	01/03/2023 12:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Policy SP20 (Strategic Approach to Employment Land) Draft Policy SP20 states that through the LPR the Council will seek to facilitate the growth and forecasted change of business development over the plan period, to meet the identified shortfall (of office and industrial space).</p> <p>Supporting Paragraph 7.9 recognises that whilst the employment allocations go some way towards meeting the identified industrial requirement, there remains a shortfall. It states:</p> <p><i>“The District is heavily constrained and this has resulted in a lack of suitable available sites. Given the identified shortfall in supply the Council will commit to seek to address this matter again at the first five year review of the Local Plan”.</i></p> <p>Supporting Paragraph 7.10 states:</p> <p><i>“The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) will provide flexibility to the figures in the later part of the plan period.”.</i></p> <p>Therefore, WBC suggest that the LRIE has potential to deliver flexibility to the employment figures over the plan period.</p> <p>The ELR states that the industrial land requirement that has been identified is a minimum and given the need to address a current market shortage for industrial space there is a more pressing need to frontload the plan with a readily available pipeline of space. So, it suggests that as much as possible of this 23ha minimum should be allocated on easily deliverable sites.</p> <p>The LPR does not accord with this as it fails to:</p> <ol style="list-style-type: none"> 1 Allocate sufficient floorspace to meet the identified need in the ELR. 2 Frontload the plan with a readily available pipeline of space. <p>Paragraph 35 of the NPPF states that plans are ‘sound’ if they are positively prepared. This is defined as providing a strategy which, as a minimum, seeks to meet the area’s ‘objectively assessed needs’. Thus, the LPR cannot be found to be sound and there is a requirement to allocate additional sites through the LPR to ensure that the LPR can be adopted.</p> <p><i>Other Comments</i></p> <p>In terms of the location of business development, we support the Council’s approach to extend the DEA allocation, at Membury Estate, and Draft Policy SP20s approach to support business development in these locations.</p> <p>The policy states that an Employment and Skills Plan will be encouraged as part of major business development proposals. Further detail on what is required to address this should be set out.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS539
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:32:44
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The supporting text to this policy notes that the plan will not be able to meet the identified employment needs in full, particularly for offices. Whilst West Berkshire is a separate Functional Economic Market Area from Reading, there would nonetheless be cross-boundary implications should a lack of provision in West Berkshire lead to pressures on adjoining areas such as Reading. However, RBC recognises that WBDC had made substantial efforts to try to identify sites for employment provision including repeated call for sites exercises and sufficient appropriate sites have not been forthcoming. RBC also recognises that the Covid-19 pandemic has likely had significant implications for working patterns and the demand for employment floorspace, particularly for offices, which will not have been reflected in the identified need. RBC is therefore satisfied with the approach proposed, which involves a supportive criteria-based policy together with a commitment to address this issue in the first five-year review of the Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	West Berkshire Council as landowner
<p>Consultee Full Name</p>	Sam Robins
<p>Consultee Organisation</p>	West Berkshire Council as landowner

Agent Full Name	
Agent Organisation	
Comment ID	PS666
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 13:10:42
Attached Files	LRIE - Addendum_05.09.22_FINAL (002).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes

Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>Propose adding additional wording to the supporting text to clarify the Council's aspirations for the LRIE. Additional wording highlighted in bold below. The evidence for this is contained within the Addendum (attached to this response) to the Avison Young Development Brief published in September 2022 available at https://info.westberks.gov.uk/lrie</p> <p>Later in these comments, under SP21, it is proposed to extend the London Road Industrial Estate Designated Employment Area to include the Football Ground – hence the inclusion of 'it currently' in the text of paragraph 7.10 below.</p> <p>7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) will provide flexibility to the figures in the later part of the plan period. The redevelopment and regeneration of the LRIE is a long held vision of the Council and a recent decision by the Council's Executive (June 2022) agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality –including the creation of 7,000 sqm of employment floorspace. The site has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site, which at present is not optimum and does not provide an attractive environment for modern day use. The majority of the LRIE site falls within the London Road Industrial Estates DEA, an area designated for business uses. It is important to note that the DEA includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate, but it currently excludes the football ground. A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Slough Borough Council
Consultee Full Name	Slough Borough Council Planning
Consultee Organisation	Slough Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1077
Chapter / Policy / Appendix Number	Policy SP 20

Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 22:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	*LATE RESPONSE* Employment need We note that the West Berkshire Local Plan Review Proposed Submission consultation proposes that the Plan is unable to make provision to meet the identified office requirements over the plan period to 2039. We note that the Council has positively sought opportunities to meet the office requirement for the District by undertaking numerous Calls for Sites and pursued opportunities through the Duty to Cooperate. Further we note that West Berkshire is unable to meet its industrial land requirement due to being constrained and lack of suitable sites.

	<p>West Berkshire is not proposing to meet its identified employment needs in full at this time. We support the commitment in the Plan for West Berkshire District Council to review the provision of employment land again at the first five year review of the plan.</p> <p>Slough Borough Council is not in the same employment market area as West Berkshire. Slough is unable to meet its employment needs in full and therefore is unable to assist with West Berkshire's unmet employment needs. Any unmet employment needs from West Berkshire will potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Saunderson, Paula
<p>Consultee Full Name</p>	Paula Saunderson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS841
<p>Chapter / Policy / Appendix Number</p>	Policy SP 20
<p>Chapter / Policy / Appendix Title</p>	Strategic approach to employment land
<p>Order</p>	69
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	28/02/2023 16:51:00
<p>Attached Files</p>	Paula Saunderson_Full LPR Response_REDACTED.pdf

<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP20 – STRATEGIC APPROACH TO EMPLOYMENT LAND</p> <p>Needs to include Retail & Commercial Lands. Needs a Map of DEAs in the Evidence Base and Individual Maps in Appendix 4.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	Yes

* Yes * No	
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stratfield Mortimer Parish Council
Consultee Full Name	Lynn Hannawin
Consultee Organisation	Stratfield Mortimer Parish Council
Agent Full Name	Lynn Hannawin
Agent Organisation	
Comment ID	PS609
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:47:38
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The policy defines rules for loss of business development with reference to town/district centres or the countryside . It doesn't distinguish rural service centres like Stratfield Mortimer which are neither of these. It would appear that, as we are outside a DEA, every conversion of a shop or farm building into a house will require significant marketing evidence and we are not sure that this was intended
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Copas Farms (Represented by Barton Willmore)
Consultee Full Name	Copas Farms
Consultee Organisation	Copas Farms
Agent Full Name	Mr Mark Owen
Agent Organisation	Barton Willmore
Comment ID	PS1147
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 16:19:00
Attached Files	Barton Willmore (Copas Farms) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

[See attachment 'Barton Willmore (Copas Farms) Full Rep' for full Local Plan Review representation]

We would like to express that our client is broadly supportive of the Plan, including its Vision and Objectives which clearly express a recognition of the value that sustainable business growth and the local economy has for the wider environment, culture, and social well-being of West Berkshire. That being said, our client has concerns as to whether the Plan provides a 'sound' strategy to deliver sustainable development regarding meeting its employment needs.

On this basis, we have prepared a representation form covering emerging policies SP20 and SP21 - Strategic Approach to Employment Land and Sites Allocated for Employment Land. In addition, we have prepared a representation form on emerging policy DM4 - Building Sustainable Homes and Businesses.

National and Local Policy Context

At a national policy level, the NPPF sets out in Chapter 6 (paragraph 81) that planning policies "should help to create the conditions in which businesses can invest, expand and adapt. Furthermore, it states in the same paragraph that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development". In paragraph 82 b, the NPPF highlights that planning policies should "set criteria, or identify, strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period".

Objective 4 of the Local Plan's Strategic Objectives, of which represent the key delivery outcomes that the Local Plan Review should achieve, states "Economy: To facilitate and support a strong, diverse and sustainable economic base across the District, including provision of employment land which provides for a range of local job opportunities". The supporting text to Policy SP20 at paragraph 7.2 further emphasises the priorities for West Berkshire with regards to the economy as set out within the Council Strategy (2019-2023) and the Council's Economic Development Strategy (2021). The Vision of the Economic Development Strategy seeks for the District to move rapidly towards a productive and resilient economy founded on the principles of "inclusive, clean growth and where everyone is given the opportunity to thrive". In this regard, our client supports West Berkshire's commitment for supporting the local economy in the District.

Identified Need and Shortfall

That being said, it is made explicitly clear within the Local Plan Review document itself, at paragraph 7.9 and the supporting evidence base that there is a shortfall in supply for both office and industrial uses. The Employment Land Review Addendum ('ELRA') (December 2022) sets out a need for 50,816sqm for office space and a minimum of 91,109sqm or 23ha of land for industrial needs. As set out in Tables 3 and 4 of the Employment Background Paper (January 2023), the Local Plan Review currently only proposes to allocate 58,400 sqm of industrial land (excluding LAM6 which already has planning permission) and 0 sqm of office land. This results in a shortfall in 32,709 sqm of industrial land and 50,816 sqm of office land as stated in paragraphs 56 and 57 of the Employment Background Paper.

With regard to office needs first, whilst paragraphs 7.9-7.12 of the ELRA conclude that the overall need is not a concern in the short-term "given that net change has been negative, gross office gains have been very modest, and developers are not promoting many sites for office use", there still remains an identified need. It is clear in paragraph 4.43 of the ELRA that the office market across West Berkshire has remained relatively robust despite the global pandemic. Moreover, in paragraph 7.11, it highlights that economic forecasts suggest that the office sector will return to growth. Currently, as stated in the Employment Background Paper (January 2023) at paragraph 33, below optimum availability/vacancy rates are resulting in a market that is not fully effective. Therefore, given the identified need and reported demand for smaller, flexible offices, referenced at paragraph 7.11 of the ELRA, any opportunities to provide this supply should be taken up now.

Turning to industrial needs, the evidence base asserts that there has been a consistently strong provision of industrial floorspace alongside strong growth in industrial jobs. As a result of the findings, the ELRA recommends that the Plan takes forward the higher past trends need figure to ensure conformity with the need to plan positively.

In addition to the strong trends in industrial floorspace provision and jobs growth, the Local Plan Review and evidence base highlight the challenges West Berkshire's faces in respect of available stock. The ELRA states in paragraph 4.54 that agent consultation indicated that "due to lack of available stock across West Berkshire most occupiers, regardless of size and sector, find it difficult to satisfy their requirements". This is further compounded at paragraph 31 of the Employment Background Paper which highlights that "industrial demand has increased since the previous assessment, while supply has continued to fall, placing further pressure on existing stock". The Employment Background Paper goes on then to highlight that there remains an acute shortage of good quality space, despite new development at Beenham and Greenham Business Parks. The ELRA expands upon this point, at paragraph 4.91, highlighting that there is particularly a shortage in supply of smaller units.

Accordingly, it is clear that there is a pressing need, in particular for industrial floorspace, in West Berkshire.

Five Year Review and Flexibility

It appears that the Council are seeking to take an approach that instead of identifying sufficient sites now, additional sites could be identified at a five-year review as referenced in paragraphs 7.7 and 7.9 of the Local Plan Review document. Related to this, paragraph 7.10 in the supporting text to emerging

	<p>policy SP20 appears to suggest that the regeneration of the London Road Industrial Estate ('LRIE') will provide flexibility to the figures in the later part of the plan period. However, in the same paragraph the Council state that due to timing of their strategy for comprehensive regeneration, the Site is not identified as a site allocation.</p> <p>Our client does not agree with the approach proposed to seek to address the supply matter at the first five-year review for three principal reasons.</p> <p>Firstly, there is a clear, and accepted, need for employment land, particularly industrial, in West Berkshire. Secondly, available sites, including Land adjacent to Beenham Industrial Estate, are promoted by a willing landowner and provide suitable options to assist in meeting this employment need now. Thirdly, due to the nature of the constraints in West Berkshire, it is unlikely that a significant amount of 'new' land will become available when the Council undertake their five-year review.</p> <p>Our client also considers that as the LRIE site is not allocated within the Plan, it cannot be considered to assist towards the employment needs within the District and reference should be removed.</p> <p>Soundness of Emerging Policies SP20 and SP21</p> <p>Considering the above, we therefore have concerns with the soundness of emerging policies SP20 and SP21 as set out below.</p> <p><u>Positively Prepared:</u> Emerging policies SP20 and SP21 have not been positively prepared as they do not seek to meet the identified employment needs, as set out within the ELRA, and therefore do not support achieving sustainable development in West Berkshire.</p> <p><u>Justified:</u> The strategy in emerging policies SP20 and SP21 does not take an appropriate strategy as it is not seeking to identify sufficient sites to meet the identified need. The reasons for doing so are not justified when considering the identified need and available sites that can contribute to this need, including our client's site.</p> <p><u>Effective:</u> Emerging policies SP20 and SP21 will not deliver enough development to meet the identified need over the plan-period. Moreover, references to additional sites (i.e. LRIE) that are not allocated should not be included as they cannot contribute to meeting need.</p> <p><u>Consistent with National Policy:</u> Emerging policies SP20 and SP21 are not consistent with seeking to meet the identified need and delivering the economic objective of achieving sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Our client also considers that the supporting text in paragraph 7.10 of the Local Plan Review document regarding the London Road Industrial Estate should be deleted as the site cannot be relied upon in meeting employment needs within the District.</p> <p>7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) will provide flexibility to the figures in the later part of the plan period. The redevelopment and regeneration of the LRIE is a long held vision of the Council and a recent decision by the Council's Executive (June 2022) agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality. The site has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site, which at present is not optimum and does not provide an attractive environment for modern day use. The majority of the LRIE site falls within the London Road Industrial Estates DEA, an area designated for business uses. It is important to note that the DEA includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate, but excludes the football ground. A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site. Due to the timing of this strategy and the site's location within the settlement boundary of Newbury, the site has not been identified as a site allocation, however it does need to be recognised as an area of regeneration for its potential to deliver flexibility to the employment figures over the plan period.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	To expand on the points made within this representation.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Community Football Club (Represented by DPDS Consulting Group)
Consultee Full Name	Newbury Community Football Club
Consultee Organisation	Newbury Community Football Club
Agent Full Name	Les Durrant
Agent Organisation	DPDS Ltd
Comment ID	PS899
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The policies do not follow national advice
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	No

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>NCFG have concerns regarding the justification and consistency with national policy of Policy SP20, in particular the approach to the London Road Industrial Estate set out in Paragraph 7.10.</p> <p>These representations are set out in full within the enclosed report, titled "Representations in respect of West Berkshire Local Plan Review (Reg 19) Proposed Submission" prepared by DPDS Consulting Group.</p> <p>These written representations are in respect of various policies and passages of supporting text. This document summarises the reasoning for considering the proposed Local Plan to be unsound in its preparation, and a suite of modifications proposed in order to bring the Plan in line with national policy and the required tests of soundness.</p> <p>The locations of interest to these representations are the London Road Industrial Estate (LRIE) and in particular the Newbury Football Ground at Faraday Road, which are briefly discussed in Paragraph 7.10 under policy SP20 Strategic Approach to Employment Land in the Draft Local Plan. LRIE is a proposed Designated Employment Area (DEA) in the Local Plan, although it is important to note that the football ground at Faraday Road is NOT (nor never has been) a part of the DEA, nor should it be considered as a part of the LRIE itself.</p> <p>The Faraday Road football ground was relisted as an Asset of Community Value in September of 2021. This designation runs until 21/09/2026. Furthermore, there are several approved planning applications for the football ground pertaining to resumption of use of the site for community sport purposes. These include:</p> <ul style="list-style-type: none"> • 20/01966/COMIND – Renewal and expansion of the existing football pitch to form a new 3G main pitch and a smaller 3G training/practice pitch. • 20/01530/OUT – Outline permission for replacement of clubhouse and new spectator stand at Newbury Football Ground. Matters to be considered: Access and Layout • 21/07575/CERTE – Confirmation of lawful use of land as a football ground under class F2 of the Use Classes Order (Amendment 2020) • 22/02443/CERTP – Application for temporary metal container that consists of changing room and toilet facilities. <p>West Berkshire Council (WBC) have a long-standing ambition to achieve redevelopment and regeneration of the LRIE site, as evidenced by Paragraph 7.10 of Policy SP20 Strategic approach to employment land of the Local Plan. NCFG supports this overall ambition, however from WBC's perspective, it has specifically and irrationally excluded the option to redevelop the football ground as a revitalised sporting venue for the overall benefit of the community. Because of this accusations of bias and predetermination has been levelled against WBC, which is contrary to the Localism Act of 2011.</p> <p>Despite the Council's significant and long-term expenditure on consulting with respect to the LRIE, there has been no planning application submitted by the Council regarding the long-term future of the estate (including or excluding the football ground). Due to the large amounts of public funds involved, confusion arising from the Council's approach, the location of the site, and the controversy resulting from all of the above, the LRIE should have been covered in the proposed Local Plan but has largely been ignored.</p> <p><u>Soundness</u></p> <p>Paragraph 7.10 of the supporting text of Policy SP20 Strategic Approach to Employment Land states the following:-</p> <p>"7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) will provide flexibility to the figures in the later part of the plan period. The redevelopment and regeneration of the LRIE is a long held vision of the Council and a recent decision by the Council's Executive (June 2022) agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality. The site has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site, which at present is not optimum and does not provide an attractive environment for modern day use. The majority of the LRIE site falls within the London Road Industrial Estates DEA, an area designated for business uses. It is important to note that the DEA includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate but excludes the football</p>

ground. A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site. Due to the timing of this strategy and the site's location within the settlement boundary of Newbury, the site has not been identified as a site allocation, however it does need to be recognised as an area of regeneration for its potential to deliver flexibility to the employment figures over the plan period.”

The Council's current strategy for the regeneration of the LRIE is outlined within the London Road Industrial Estate Project Refresh report (Ref. EX4219), dated 9th June 2022. The Refresh report refocuses plans on intensifying employment use on the site, marking out the 'depot site' and the 'playing field' as two areas to be redeveloped (despite the fact that the playing field is not within the DEA boundary, as stated in paragraph 7.10 of policy SP20). It seeks to create an LRIE Supplementary Planning Document (SPD) for the redevelopment of the site, rather than for example a site specific Local Plan allocation. It also provides a timeline for delivery, estimating the adoption of the SPD by the end of 2024, with both the depot site and playing field site redeveloped for employment use by 2026.

This approach to the redevelopment of the LRIE is unsound and does not align with plan-making principles outlined in either the NPPF or the NPPG. Paragraph 35 of the NPPF outlines the key criteria that a plan needs to meet in order to be considered sound. Part d) of this paragraph states that plans should be consistent with national policy to be considered sound. The supporting text of Paragraph 7.10 in the Draft Local Plan does not provide sufficient clarity on the future of the LRIE site (or the football ground) despite the Refresh report containing a delivery strategy for the site with a timescale up to 2030. This is in conflict with NPPF Paragraph 16d) which states that plans should “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”. The Local Plan clearly fails to meet this requirement.

In addition, Paragraph 35b) states that plans should be justified, being an appropriate strategy, which takes into account the reasonable alternatives, and based on proportionate evidence. The proposed local plan fails to justify why LRIE is only mentioned in supporting text when the Council has specific plans for the regeneration, contained within the Refresh report.

Our client would also like to raise that the redevelopment of a site the scale of LRIE, either through a proposal for the net area of the entire site or through a series of linked and phased proposals, would be subject to significant detailed EIA work. This is due to several important constraints at the site, including flood risk, traffic, biodiversity etc.

As a result, a comprehensive development-plan led policy framework would be required to set out criteria for sustainable development or redevelopment. An SPD approach would not be able to achieve this and therefore should not be considered as an alternative to a development-plan policy framework. A comprehensive development-plan led approach would in turn allow the proper assessments and procedures i.e. a SEA to be undertaken and policy criteria applied to ensure the sustainable development of the site in line with both the NPPF and the policies proposed within the Local Plan. It is worth noting that a development plan led approach does not appear to have been considered in the Refresh report.

SP20 Strategic Approach to Employment Land

NCFG objects to the approach to the LRIE given in paragraph 7.10 of the supporting text of Policy SP20, for the reasons outlined above. Paragraph 7.10 should be deleted and replaced with site specific policies for both LRIE and the Faraday Road football ground.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Yes

Please give reasons for your answer

4. Proposed Changes

The proposed changes are outlined in full within the report titled “Representations in respect of West Berkshire Local Plan Review (Reg 19) Proposed Submission” enclosed with this submission form. The proposed changes within this form also concern policies other than Policy SP20, but these have not been made the subject of additional representation forms as the changes are dependent on the content of the main representation on the policy.

In order to make the plan sound, our client proposes a suite of modifications to the Local Plan to facilitate an appropriate approach to the regeneration of LRIE which would contribute not only to achieving the Council's strategic objective of meeting employment land need, but also positive outcomes for both the LRIE and the Faraday Road football ground, and contribute to the fundamental principles of sustainable development in line with the NPPF.

London Road Site Specific Policy

Our client appreciates WBC's ambition to intensify employment uses, including maximising the use of existing sites, but wishes to ensure that any redevelopment or regeneration of LRIE is evidence based and recognises the particular constraints of the site, together with a review of the full range of alternative sites available within Designated Employment Areas in Newbury which may be more appropriate, such as the now vacant elements of the Vodafone Campus or the Turnpike Estate. As such, it is proposed that a site-specific policy be included addressing the regeneration of the LRIE site. This policy must consider the following key criteria for development at the site:

- **Flood Risk:** The majority of the site is within Flood Zone 3, meaning a high risk of flooding. Any proposals for use or change of use should be required to undertake a sequential test in accordance with Policy SP6 Flood Risk. Stormwater attenuation measures and already existing opportunities to mitigate against the effects of flooding on site or in the vicinity should be considered positively.

The failure to provide an appropriate policy specifically aimed at guiding sustainable redevelopment of LRIE means that the whole site is potentially open to piecemeal and sporadic development. The size of LRIE is such that in the context of a comprehensive or phased redevelopment it would undoubtedly constitute EIA development within the context of the EIA Regulations 2017 and therefore required a development plan i.e. site specific Local plan policy framework to set out the criteria that need to be addressed and met if sustainable redevelopment proposals are contemplated.

- **Climate Change:** Given the ongoing climate crisis, and especially the already measured and predicted effects of climate change in relation to weather & flooding, it is of paramount importance that any proposals for development or redevelopment in LRIE should satisfy the criteria of Policy SP5 Responding to Climate Change and any appropriate requirements that may be introduced by site specific Local Plan policy.
- **Biodiversity:** In line with the requirements of the Environment Act 2021, any development at LRIE should be required to demonstrate a 10% Biodiversity Net Gain, meeting the requirements of Policy SP11 Biodiversity and Geodiversity.
- **Traffic Generation:** As any intensification of employment use at the LRIE would result in increased amounts of traffic from the site, a set of criteria should be developed to ensure that the impacts of this are fully understood and mitigated against.
- Other site specific policy criteria should also be introduced to control the design, height, massing and land use mix of development or redevelopment proposals as may be appropriate.

The Policy should also include a reference to the Proposals Map or other inset map as may be appropriate which clearly shows the boundary of the LRIE site proposed for regeneration, excluding the Faraday Road football ground.

This would allow the Plan to clearly state their policy towards the regeneration of the LRIE and ensure that it is developed or redeveloped sustainably in accordance with both the NPPF and the policies outlined in the Proposed Local Plan via the application of site-specific development criteria.

We do not believe it is our client's responsibility to define the specific wording of this policy however we do believe that it is necessary and of paramount importance.

Faraday Road Football Ground Site Specific Policy

In the light of approved planning applications for the resumption of community football use at Faraday Road and the designation of the site as an ACV, the football ground is of very significant benefit to the local community. It has consistently been a strategic objective of West Berkshire Council to protect and enhance community infrastructure in Newbury, with the West Berkshire Core Strategy's Area Delivery Plan Policy 2: Newbury stating that "Existing community facilities will be protected and, where appropriate, enhanced", with this wording being carried forwards into Policy SP1 Spatial Strategy.

Furthermore, the site is partially within Flood Zone 3, and within the Impact Risk Zone of the River Kennet SSSI. On account of these significant constraints, the client also proposes that a specific policy be implemented concerning any proposals for use or change of use of the football ground at Faraday Road. The following is the suggested wording of such a policy:

"New Policy: Faraday Road Football Ground

The Faraday Road Football Ground provides significant value to Newbury as an element of green infrastructure and a community sports facility, along with opportunities to mitigate against flood risk. As such, any proposals for use or change of use at the Faraday Road football ground site must:

- 1 Acknowledging the site's importance as a key asset of open space, green infrastructure, and community value, and in line with the Council's stated strategic objectives and the objectives of Policies SP10 and DM39 to protect and/or enhance green infrastructure assets and community facilities, any proposals for development or redevelopment at the site must retain the use of the site for community sporting purposes, along with satisfying any other relevant criteria from these policies;
- 2 Undertake a site-specific Flood Risk Assessment and Sequential Test clearly demonstrating that compliance with the criteria included in Policy SP6 Flood Risk, and positively consider stormwater attenuation measures, providing equal or greater potential for flood mitigation measures than currently exist at the site;
- 3 Clearly demonstrate compliance with Policy SP11 Biodiversity and Geodiversity, having regard to any potential adverse impacts on the River Kennet SSSI;
- 4 Prepare a Transport Assessment to address any projected increase in traffic on account of the proposals and set out envisaged measures to mitigate against any impact arising as a result;
- 5 Respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials, and solar gain, in accordance with Policy SP5."

It is also suggested that the following passage be added to the pre-amble or supporting text of the policy, as part of the reasoned justification of it:

The Council recognises the Faraday Road Football Ground as a key recreational asset of considerable merit. Acknowledging this, the stadium will be retained for community sport use and NOT form part of any wider proposals for development at LRIE.

On behalf of our client, we would welcome the opportunity to discuss any changes to the proposed Local Plan with West Berkshire Council in advance of the Examination.

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

Yes

5. Independent Examination	We believe it is necessary as we are proposing significant modifications and the site which is the subject of our core representations is both important and controversial.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Swindon Borough Council
Consultee Full Name	Stephen Hay
Consultee Organisation	Swindon Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS725
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 14:37:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Swindon Borough Council (SBC) has received a formal request under Duty to Co-operate (Section 110 of the Localism Act) to try and assist with meeting West Berkshire's unmet employment land and space requirements over the plan period. Swindon is one of a number of Local Planning Authorities which have been asked within a 60-minute 'drive time' of Newbury. This drive time area includes a very large geographical catchment and one of the reasons SBC have been asked under DtC to respond to the request.</p> <p>1.1 West Berkshire describe the shortfall as substantial and consists of: Office shortfall: 50,816sqm (requirement – allocations = shortfall) 50,816 – 0 = 50,816sqm) Industrial shortfall: 32,709sqm (requirement – allocations = shortfall) 91,109 – 58,400 =32,709sqm 23ha – 14.6ha = 8.4ha)</p> <p>1.2 The Councils of West Berkshire, Swindon Borough and Wiltshire have met on occasions prior to the drafting of the Regulation 19 consultation document and more recently during the Regulation 19 consultation period mainly on matters of evidence and employment need clarification.</p> <p>1.3 Swindon Town is located approximately 37 minutes from Newbury (28.5 miles) via the M4. SBC does not share an administrative boundary with West Berkshire although the wider Wiltshire area shares an eastern boundary (importantly AONB) with West Berkshire.</p> <p>Swindon Borough Council and Plan Making</p> <p>1.4 SBC is currently in the process of developing a new Local Plan to replace the adopted Swindon Borough Local Plan 2026. The Council updated its Local Development Scheme in December 2022 and is in the process of working towards a Regulation 18 Local Plan consultation in Autumn 2023. This work will build upon and update evidence work undertaken as part of an initial Local Plan review process, to include work upon a long-range economic growth vision / strategy, review of the Functional Economic Market Area (FEMA), town centre uses and technical work on employment land needs and supply. The development of this evidence it at an early stage.</p> <p>1.5 Swindon is recognised as a 'growth town' with strong economic ambitions but the Council needs to be clear on what its updated forecast needs are for its revised plan period and how these can be met effectively and sustainably within the Borough and importantly prior to accommodating the needs of other authorities, including West Berkshire. The final evidence base for the new Swindon Local Plan will underpin the framework for meeting local economic needs within the Borough and will also analyse strategic growth options and pressures. Fundamentally the Council is keen to maximise opportunities</p>

for people to live and work locally and sustainably with access to a diverse and high performing economic base.

West Berkshire Local Plan

1.6 The Council has reviewed the economic technical evidence with the plan including:

- *Berkshire Functional Economic Market Area Study: Lichfield Report – Feb 2016*
- *West Berkshire – Employment Land Review: Addendum: Stantec / Urba – December 2022)*
- Retail Background Paper (December 2022)

A brief review of the Newbury Town Centre Masterplan has also been undertaken.

1.7 Its is noted that while the West Berkshire Travel to Work area is relatively self-contained and based upon historic data there may be some strategic economic connections (flow of goods and labour) along the M4 corridor between larger urban conurbations. West Berkshire settlements such as Newbury are also spatially well related to Reading, Basingstoke and other South East orientated locations by road connections and proximity.

1.8 On the office market generally the evidence would indicate that the West Berkshire office market is driven by demand from smaller occupiers delivering potentially people servicing jobs in the future and this type of market can be very local or location specific. It is clear that Newbury as a major settlement has seen significant office losses driven by a number of factors including changes in permitted development rights. Although the shortfall in office provision in the short term is not considered significant due to current deflated market demand linked to recent macro-economic factors the medium / longer-term needs are potentially more significant.

1.9 It is however encouraging that the Council is taking positive steps with regard to plan policies and the Newbury Town Centre Masterplan to support regeneration and transformation. The town centre masterplan focuses specific attention on becoming a more entrepreneurial town delivering new office space and focuses particularly on delivering smaller, fit-for-purpose, flexible office space for small businesses, start-ups and those looking for occasional workspace closer to home. Meeting local office needs through a proactive policy, regeneration and investment framework is considered as proving West Berkshire with good opportunities to develop local jobs in a sustainable manner.

1.10 With regard to the overall industrial market SBC understands that some of the pressures around space demand are for more 'footloose' distribution and logistics businesses particularly within the context of firms being priced out of high value areas. It would be good to more fully understand the extent that distribution / logistic demands are specifically driven by close proximity to Reading and London markets rather than being attracted to site options further afield. Wider industrial demands will also be driven by local business needs.

1.11 SBC is supportive of West Berkshire's broad plan ambitions but the full application of strategy (including master-planning), flexible Local Plan policies and other tools may yield further positive outcomes to support local economic ambitions and reduce needs shortfalls.

1.12 On the basis of this note and the current early stage in the development of the new Swindon Local Plan with an updated evidence base, the Council is unable to assist West Berkshire Council with meeting its office and industrial shortfalls. The Council is of course happy to keep communications open under Duty to Cooperate.

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Wiltshire Council
Consultee Full Name	Georgina Clampitt-Dix
Consultee Organisation	Wiltshire Council - Spatial Planning
Agent Full Name	
Agent Organisation	
Comment ID	PS735
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:12:00
Attached Files	20230303_West_Berkshire_Local_Plan_Regulation_19_Response_Wiltshire Council.docx
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Wiltshire is located to the west of West Berkshire and shares its eastern boundary. The shared boundary is wholly within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).</p> <p>As recognised in paragraph 5.14 of your 'Interim Duty to Cooperate Statement' we have been engaging with you, alongside Swindon Borough Council, about a shortfall in employment land. It is noted that your criteria for engagement is local authorities within a one hours drive of Newbury and as such you are engaging with many other local planning authorities to discuss this issue also.</p> <p>Wiltshire Council is at an advanced stage in preparing its Local Plan Review and we are moving towards our own Regulation 19 consultation later this year. In developing our plan, our focus is on ensuring that Wiltshire's needs can be met taking into consideration the constraints to development that we have in the county and the availability of land being promoted for employment use.</p> <p>Section 7 of the West Berkshire Local Plan Review relating to economic growth contains two policies - Policies SP20 'Strategic approach to employment land' and SP21 'Sites Allocated for Employment Land'. Paragraphs 7.6 and 7.9 identify shortfalls in sites to meet the local need for office and industrial land, and elsewhere evidence points to the loss of offices to other uses. In such circumstances, it will be critically important to ensure that your planning policies robustly support the retention, intensification, and regeneration of existing sites/areas, as well as encouraging and facilitating windfall sites that could come forward over the plan period. Such a strategy alongside the positive identification of employment allocations will help ensure that employment delivery can be maximised over the plan period; and that people can live and work locally.</p> <p>It is understood that your employment needs are of a local nature and as such it will be important for them to be provided locally, or in areas with settlements that are spatially well related to Newbury and other urban parts of the District. Such settlements are in the authorities in the South East, rather than to the west of the District in Wiltshire where the character of the area is largely AONB.</p> <p>For the above reasons, at this stage it is considered that Wiltshire Council is unable to assist West Berkshire Council in meeting its shortfall but will continue to engage with you as appropriate under the Duty to Cooperate.</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Wokingham Borough Council
<p>Consultee Full Name</p>	Wokingham Borough Council

Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1470
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comments.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes

<p>Please give reasons for your answer</p>	<p>Wokingham Borough Council (WBC) notes that West Berkshire District Council's (WBDC) employment evidence identifies a need for 50,816sqm of office floorspace and a combined 91,109sqm industrial, storage and distribution floorspace over the plan period. Policy SP20 details the strategic approach to addressing economic development needs, Policy SP21 sets out a number of site allocations for industrial land, and Policy DM32 identifies Designated Employment Areas where businesses uses are to be safeguarded. No allocations are made in the Plan for additional office floorspace.</p> <p>The Plan supports the redevelopment and regeneration of existing employment sites. It therefore retains, and identifies new, employment sites which can be intensified to meet some of its identified needs. New allocations for industrial use are anticipated to provide 58,400sqm. However, this is insufficient to meet the full identified needs for industrial land, resulting in a shortfall of 32,709sqm industrial floorspace. There are no estimates provided of how much floorspace the wider policy approach might deliver, and no specific land is identified to provide for office use. As a result, the full identified office need of 50,816sqm remains unmet. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs.</p> <p>Like WBDC, WBC has commissioned a new Employment Land Needs Review, to better understand future economic needs, for both office and industrial/warehousing. The key emerging finding of the report is an increased need for industrial/warehousing floorspace across Wokingham Borough, which reflects changes in both the local and sub-regional economy. The report suggests there is no need for additional office floorspace.</p> <p>Work is ongoing to assess the availability, suitability and deliverability of land promoted for economic uses within Wokingham Borough, as part of the Housing and Economic Land Availability Assessment (HELAA), which will help to inform whether these economic needs can be met. However, given the scale of the need for new industrial/warehousing floorspace arising in Wokingham Borough and the small number of sites promoted for economic uses, at this stage WBC confirms that it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated. Indeed, WBC cannot guarantee meeting the need arising from Wokingham Borough.</p> <p>WBC recognise and support WBDC's ongoing recognition of the arising employment needs and the attempts to reach agreement with other authorities. WBC requests continued engagement with WBDC on this matter as part of the duty to cooperate.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>WBC notes that separate duty to co-operate discussions are ongoing between the two authorities. WBC welcomes these discussions progressing</p>
<p>4. Proposed Changes</p>	<p>N/A</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Royal Borough of Windsor & Maidenhead</p>

Consultee Full Name	Royal Borough Windsor & Maidenhead
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1538
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

* No	
Please give reasons for your answer	The Royal Borough recognises that West Berkshire have identified a shortfall in office and industrial space and have committed to seek to address this matter at the first five-year review of the Local Plan. We have welcomed the opportunity to engage positively with you on this and other matters, through the Duty to Cooperate mechanism. However, I would revert to my letter, dated 24th February 2023, and reiterate that the Royal Borough is unable to assist in meeting some or all of your unmet employment land and space needs over the plan period, for the reasons detailed in that letter. In conclusion, the Royal Borough of Windsor and Maidenhead has no concerns or objections to the Regulation 19 version of the Local Plan Review.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1779
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>It is noted that draft Policy SP20 has been updated to clarify that 'appropriate proposals for business development (offices, industrial, and storage and distribution) will be supported where they are located...On previously developed land within existing suitably located employment sites; or e. Within the countryside provided the proposal is in accordance with other relevant policies within the Plan, in particular Policy DM35.'</p> <p>The clarification regarding the contribution of development at existing employment sites or at suitable rural sites is welcomed given the importance of these sites to the local rural economy, as well as towards the District's overall employment needs set out in the Employment Land Review (Addendum 2022). This also follows the provision of paragraph 84 of the NPPF, which clearly states that planning policies should 'enable: the sustainable growth and expansion of all types of business in rural areas'.</p> <p>Given the District's overall employment needs and identified shortfall in provision, it is however also recommended that the development of suitable sites adjacent to existing employment areas is also supported within Policy SP20. This would enable the development of suitable land adjacent to Green Park (which is designated for employment use within Reading and Wokingham Boroughs) to come forward. As set out in our previous representations – at the Estate's land at Green Park, Kirtons Farm Road (ref. BUR12), the western half of the site is situated within West Berkshire and the eastern half of the site is within Wokingham and is allocated for around 20,000sqm B Class uses as part of a 'Major Development Location' and 'Core Employment Area' designation (Wokingham Managing Development Delivery Local Plan (2014) Policy SAL07). There is no substantial natural boundary across the site which</p>

	<p>clearly defines the local authority boundaries. The NPPF (paragraphs 24 and 35) encourages effective strategic planning and therefore it is critical that the site is considered in its overall context across local authority boundaries and that Policy SP20 enables the appropriate development of the site.</p> <p>Policy SP20 also continues to state that new office development outside of a town or district centre or Designated Employment Area will be required to satisfy the sequential test. The NPPF (paragraph 89) is clear however that the sequential test should not be applied to small-scale rural offices or other small-scale rural development. It is important that Policy SP20 is updated on this basis in order to ensure that suitable smallscale proposals can come forward to support the rural economy without unnecessary additional justification.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>Policy SP20 as currently worded does not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, the following changes are recommended in order to ensure the soundness of the Plan:</p> <p>'Appropriate proposals for business development (offices, industrial, and storage and distribution) will be supported where they are located...</p> <p><u>On a suitable site adjacent to an existing employment site:...</u></p> <p>"Proposals for new office development that are not within a town or district centre as set out in Policy SP22 or within a DEA will be required to satisfy the sequential test. <u>Proposals for small scale rural offices will not be required to satisfy the sequential test.</u>"</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1432
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land

Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The proposal to allow office development in Designated Employment Areas is unsound. If the office market recovers there will be pressure to redevelop non-office premises as offices and this will lead to the loss of skilled, semi-skilled and unskilled manual occupations. The sentence "new office developments within Designated Employment areas (DEA) will be exempt from the sequential test in accordance with Policy SP20" will endanger the viability of town centres.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	The policy should be re-worded so as not to allow office developments in Designated Employment areas
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To explain to the inspector why office developments in Designated Employment areas should not be allowed Sentence "new office developments within Designated Employment areas (DEA) will be exempt from the sequential test in accordance with Policy SP20" should be removed
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Green Park Reading No.1 LLP (GPR) (Represented by Deloitte)
Consultee Full Name	Green Park Reading No1. LLP (GPR)
Consultee Organisation	Green Park Reading No.1 LLP (GPR)
Agent Full Name	Phil Wright
Agent Organisation	Deloitte
Comment ID	PS1222
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:50:00
Attached Files	Deloitte obo Green Park Reading No1 LLP_Figure 1.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>West Berkshire Local Plan Review to 2039 – Regulation 19 Proposed Submission Consultation</p> <p>We write on behalf of our client Green Park Reading No.1 LLP, which is the owner of Green Park. Green Park Reading No.1 LLP (“GPR”) is ultimately wholly owned by Mapletree Investments Pte Ltd (“Mapletree”). This response relates to the Regulation 19 Proposed Submission Consultation of the West Berkshire Local Plan Review (“the LPR”), which is open for comment until 3 March 2023. Deloitte previously responded to two Regulation 18 Consultations on behalf of GPR on 21 December 2018 and 5 February 2021.</p> <p>In writing this letter, we do so under the statutory provisions of a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Background to Green Park</p> <p>Since acquiring GPR in 2016, Mapletree has been reviewing the Park’s potential, undertaking asset management and considering future opportunities. GPR is keen to support the Council in achieving sustainable development in the Borough.</p> <p>Green Park is a premier business park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of the three local authority areas, covering a 79-hectare plot offering high quality office stock and associated amenities, located around a central body of water.</p> <p>Green Park is accessed from the A33 relief road and is located south of Reading town centre. The Park is home to a variety of office occupiers across a range of business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.</p> <p>The Park continues to be highly successful with ongoing interest from both global and smaller companies for office space. In 2016/17, Aukett Swanke undertook a refresh of the Fosters masterplan prepared in 1998 in order to update the development potential of the Park. Mapletree continue to look for opportunities to respond to market demand and manage the planned growth of the Park in a sustainable way. Securing an allocation for employment uses on land at 900 South Oak Way forms part of this ambition (referred to hereafter as the Site (see Figure 1 below)).</p>

[See attached map - Deloitte obo Green Park Reading No 1LLP_Figure 1]

Previous Response to Regulation 18 Draft Local Plan

On behalf of GPR, Deloitte submitted formal representations in response to the LBW Pre-Publication (Regulation 18) Draft Local Plan on 21 December 2018 and 5 February 2021. As part of the previous consultation, GPR proposed a series of changes, including the below:

- Requested that Green Park was included as a Designated Employment Area;
- Requested an emphasis on the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park;
- Requested support for Data Centres; and,
- Requested clarification be added to Policy SP 4 that although the Office for Nuclear Regulation will be consulted, it is unlikely this will restrict non-residential development in the Detailed Emergency Planning Zone (DEPZ).

Local Plan Regulation 19 Response

Policy SP20: Strategic Approach to Employment Land

Policy SP20 states that new office development outside of town or district centres and the defined Designated Employment Areas will be required to address the sequential test. GPR would like to reiterate that this creates a potential barrier to the long-term investment and sustainable growth of Green Park should it not be defined as Designated Employment Area.

The Policy also states that development proposing a loss of business development outside of a Designated Employment Area will be required to justify the loss of floorspace with marketing evidence. GPR emphasises that flexibility is needed to provide sustainable business development that will allow proven employment sites to meet the demands of the market. GPR requests that a point is added to the policy to state that subsidiary uses to existing or new business development would not face the same sequential test even if they fall outside a Designated Employment Area.

In considering the aims of the proposed policy, and as proposed previously, GPR requests that Green Park is classified as a Designated Employment Area. It is also important that the LPR does not restrict business development coming forward in suitable locations outside of Designated Employment Areas as currently defined, which as currently drafted would include Green Park. The Park’s clear success to date as a proven business park shows that business-related development in this area would be entirely appropriate and should therefore be encouraged.

GPR previously requested that Policy SP20 be updated so that a further sentence is added to prioritise office development “*in a suitable location adjacent to existing and established office or business locations.*” GPR therefore supports the updated LPR’s inclusion of “*support for redevelopment and regeneration of existing employment sites for business uses*” and requests that this addition and its overarching principle is maintained in the next draft of the LPR.

GPR considers that it is important that the LPR recognises the benefits of providing supporting subsidiary uses such as small-scale retail or hotel to business development locations. These can support the continued economic function of existing and future employment areas, allow the most efficient use of land, and support travel which is less reliant on unsustainable modes. As seen in the previous representations issued in response to the Regulation 18 consultation, GPR again requests that a supporting note is added to Policy SP20 to confirm that supporting subsidiary uses such as small-scale retail or hotel use are appropriate for new office development. The success of existing supporting uses at Green Park, such as the creche facility, demonstrate how subsidiary uses can support its position as a premier office location.

GPR previously requested that Data Centres be included as an appropriate business development. These facilities are increasingly vital in supporting the needs of companies working at the forefront of digital innovation and can respond well to otherwise constrained locations. Green Park would be a suitable location for Data Centres support the existing and future businesses in Reading and the wider Thames Valley. Whilst Data Centres have been listed as a business use in relation to the requirement for BREEAM assessments in supporting text of Policy DM4, GPR continues to request that Policy SP20 is also updated to include Data Centres as an appropriate business use.

Summary

In summary, GPR welcomes the West Berkshire LPR and the published Regulation 19 document. However, GPR requests several modifications to the LPR as set out in this letter. In particular, GPR requests that the identified Site is classified as a Designated Employment Area to reflect its existing uses and its existing allocation, and that additional guidance is given in relation to the consultation process and considerations for development located within a DEPZ.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1275
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>We believe the approach is too passive. If “Positively Prepared” means working with all local stakeholders and in particular landowners, it is clear to us that certain key stakeholders could have been persuaded to resolve the issue of lack of employment sites in suitable locations.</p> <p>Newbury Town Council under a Conservative administration resolved to include development of Newbury Showground as part of its Vision under successive political administrations since 2018. The site is very convenient for the occasional events held there by the Newbury & District Agricultural Society (NDAS), aimed largely at the rural business sector.</p> <p>However this site, now largely Brownfield although located in planning terms in open countryside just inside the AONB, is much under-used. We are aware that there is significant – but not majority - support for further development within NDAS membership at present but we would expect and wish for the trend to continue towards making the Showground a hub for distribution, led by its situation at the geographic centre of the AONB but also easily accessible by the national highway network and within close reach of a varied workforce in Newbury & Thatcham We also believe it could enhance its appeal over the Plan period as a rural business hub for a wider area of North Wessex & beyond.</p> <p>It also links to the Council’s unanimous aspiration to redevelop the London Road Industrial Estate (LRIE), which is a DEA owned by the Council. Our view is that, in the short to medium term, some business occupiers at LRIE might be relocated to the Showground to enable that site to be redeveloped earlier in the Plan period than is otherwise likely. As stated in 7.7 “there is little or no viability in the [office development] market” at present, so the current range of LRIE business occupiers is likely to remain, leaving the “[un]attractive environment for modern day use” (7.10) there for the foreseeable future – as it has been for the past 20 years since the Council first realised its estate was seriously in need of redevelopment. As per 7.6: “market signals are generally not sufficient to trigger new build office development on a speculative basis”. That seems to be admitting that LRIE will not be redeveloped for purely commercial use any time soon.</p> <p>We also have concerns that by encouraging office development in DEAs (as implied in 7.7 second sentence) such as LRIE, where there are many ‘blue collar’ jobs in the motor industry, the future viability of these businesses may be endangered unless there are other employment sites within a short distance from their customer and employee base. These businesses could therefore be relocated at the Showground.</p> <p>There is currently not enough evidence that the policy is Justified or Effective. We have no confidence that LRIE will be redeveloped for commercial use within the Plan period without significant proactive intervention in the employment land market by the District Council. The Liberal Democrat Group is of the view that by allowing the re-provisioning of the football facility in Faraday Road and by implementing the consented Gateway Plaza (despite and indeed because its residential component will improve the overall financial viability of LRIE redevelopment) the Council will attract significant interest in commercial development of the rest of the site, provided some of its current occupiers can be relocated at least temporarily. This is touched on also in our response to SP12.</p> <p>We would like to see the Council reaching out to NDAS and all rural businesses through the newly formed West Berkshire Rural Business Forum, the North Wessex Downs AONB Management Board and local</p>

	<p>councils across the District with its “vast rural area that is host to a large number of small and medium sized enterprises” (7.16) and beyond and to work up a strategy that sees Newbury Showground become a hub for the North Wessex rural business community.</p> <p>This could perhaps also relieve Membury of some of the HGV traffic that currently this Council is helping to impose on minor rural roads (e.g. Ermin Street) by allocating employment sites relatively remote from where their workforce live. Membury is not sustainable and its use for employment has harmed the AONB significantly more than we believe Newbury Showground would. We know that unauthorised and uncontrolled access through Membury Services is made by vehicles on journeys generated by this employment area, because that cuts 5 miles off the journey onto the M4 at J14.</p> <p>This is a matter outside of the control of the Council as Local Highway and Planning Authority but unless it is properly legislated for and enforced, J13 in contrast involves less than 8 miles distance from the national highway network and is 12 miles nearer Newbury than Membury and immediately adjacent to the Showground. It would be far more suitable than Membury as a dedicated employment area.</p> <p>Having a major distribution centre at the Showground is likely to also reduce demand for such development at Colthrop, which would in turn reduce the number of HGVs using the A4 through Newbury & Thatcham. This would encourage greater uptake of active travel on the A4 and its feeder roads and therefore be more consistent with national policy.</p> <p>Although Newbury Showground appears to be largely greenfield land and is used for part of the year for grazing, it has substantial areas of hardstanding and several permanent buildings on it. The Newbury Racecourse site was treated as a brownfield site when it was allocated for housing and the proportion of previously developed land on both sites is similar. It also supports some existing employment. Therefore it complies with ‘d’ of policy SP20.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Not applicable because NDAS is not one of the statutory bodies listed in the Duty to Cooperate
<p>4. Proposed Changes</p>	<p>We have no proposals to change SP20 or its supporting text, which is worthy but likely to be ineffective without changes to SP21 and the list of DEAs, as suggested below.</p> <p>In SP21, delete ESA3 (in Membury) including reference to it in 7.25 and add Newbury Showground.</p> <p>We would need supporting text adding for the Showground, based on the wording in the above section.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To explain further and provide evidence in support of the above.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Fairhurst Estate (Represented by Gerald Eve LLP)
<p>Consultee Full Name</p>	Fairhurst Estate
<p>Consultee Organisation</p>	Fairhurst Estate
<p>Agent Full Name</p>	Mr

	Robert Davies
Agent Organisation	Gerald Eve LLP
Comment ID	PS1392
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:12:00
Attached Files	The Fairhurst Estate.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

Please give reasons for your answer	The draft Plan has not been positively prepared, and is neither justified nor effective in respect of strategic employment provision.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	<p>[See attached The Fairhurst Estate map]</p> <p>Our clients own and control land situated immediately to the south east of the M4 motorway at junction 13. A site location plan of this land is included at Annex 1.</p> <p>It is considered that the land provides an opportunity for meeting some of the economic objectives of the new Plan in an appropriate and deliverable form with excellent access to the strategic highway network, and the potential for enhanced linkages into Newbury itself.</p> <p>We consider that the location should be carefully considered for employment generating uses as part of the Local Plan Review, and was put forward in or response to the Housing and Economic Land Availability Assessment (HELAA).</p> <p>The location was assessed within the HELAA (and given the site reference CHI24). We disagree with the conclusions of the site assessment, and also with the overarching approach of the draft policy approach. The policy approach fails to deliver appropriate opportunities for employment development and economic activity alike. We note that there is not one reference to logistics provision within the entire Emerging Draft West Berkshire Plan which would be most appropriately located adjacent to a key motorway and trunk road junction (M4/A34 Junction 13).</p> <p>Policy SP20 should identify the land under site reference CHI24 for strategic employment development as a Designated Employment Area to allow for the provision of new quality employment space. This could comprise a mixture of employment generating uses that would most appropriately be located adjacent to the interchange, service area and showground.</p> <p>Notwithstanding the comments within the HELAA Stage 2(B) "Assessing Suitability", the site is capable of providing access to the highway network without passing through or impacting the service area. Liasion would be required with Highways England and other stakeholders in order to achieve an appropriate solution.</p> <p>In respect of other considerations within the HELAA, Sustainable Drainage Systems could be incorporated, and as noted, there would be low risk from 24 hour per day operations which would suit many employment generating enterprises seeking to locate here. As a result of ownership, the site could deliver a net gain in biodiversity, and also any Green Infrastructure requirements.</p> <p>In respect of the landscape setting, layout principles and frameworks could frame the form of development.</p> <p>We strongly disagree with the conclusions in respect of suitability within Stage 2(b), and consider that:</p> <ul style="list-style-type: none"> • Development would be capable of being appropriate subject to establishing principles of design; • The location adjacent to a key interchange on the motorway and trunk road network means that it is ideally suited for several forms of employment generating development; and • Any concerns around highways impacts would be capable of being overcome and mitigated as appropriate. <p>We consider that the site as identified on the enclosed plan should have been properly considered for a range of employment generating uses.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	In order to articulate the position clearly
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Valley Chamber of Commerce (Represented by DPDS Consulting Group Ltd)
Consultee Full Name	Mr Paul Britton
Consultee Organisation	Thames Valley Chamber of Commerce
Agent Full Name	Ms Mandy Wetherell
Agent Organisation	DPDS Consulting Group Ltd
Comment ID	PS1578
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:22:00
Attached Files	DPDS obo TVCC_attachment_full rep_redacted PS1578 DPDS obo TVCC Business Manifesto 2023.pdf PS1578 DPDS obo TVCC West Berks LPPS 2022.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p><See attached report for full representation - DPDS obo TVCC_attachment_full rep_redacted></p> <p>Introduction</p> <p><u>Introduction and Background to West Berkshire Chamber of Commerce</u></p> <p>West Berkshire Chamber of Commerce (WBCC) is the British Chamber of Commerce's (BCC) accredited Chamber for the West Berkshire area. WBCC are part of the Thames Valley Chamber of Commerce Group (TVCC) which covers Heathrow and the Thames Valley corridor from West London to Swindon which collectively represents over 4,000 businesses and 5,000 active trade customers as part of its wider membership, many of whom have business interests or are represented in the West Berkshire area. TVCC is recognised as the leading voice of business representing micro to major multi-international organisations and is a centre of excellence providing international trade services and global representations committed to long term relationships with its members and providing them with relevant value-added services that assist, support and protect regional, national and international business.</p> <p>Whilst West Berkshire is located in the western end of the South East region, WBCC firmly believes that in economic terms the area is very much aligned to London and the South East, particularly the heart of the Thames Valley and including strong linkages with Oxfordshire to the north and Hampshire to the south as well as the rest of Berkshire and Buckinghamshire.</p> <p><u>WBCC's Engagement in the Development Plan Process</u></p> <p>TVCC, on behalf of WBCC, has played a key part in the Development Plan and planning process over many years at a national, regional and local level. During that time, it has submitted representations and appeared a Public Examinations throughout the Thames Valley and surrounding area. As noted in Section 1 of these representations above, WBCC's economic hinterland extends extensively not only into Swindon and Wiltshire to the west but also into Hampshire and Oxfordshire to the south and north respectively and the rest of Berkshire (Reading, Bracknell and Wokingham) to the east and further east towards London Heathrow airport. Our representations have been made in these areas as gauged appropriate to WBCC's member interests.</p> <p><u>Business Manifesto and Local WBCC Policy Priorities</u></p> <p>Attached to these representations are copies of the TVCC Business Manifesto and the WBCC Local Policy Priorities Statement which set out both the business agenda sought by the Thames Valley Chambers generally and the policy priorities for the WBCC area. These are not repeated in the representations, but we would request that they form an invaluable reference source that should be read in connection with these representations to set and establish their full context. < see attached documents - PS1578 DPDS obo TVCC_Business Manifesto 2023 and PS1578 DPDS obo TVCC_West Berks LPPS 2022 ></p> <p>Comments on Local Plan Proposed Submission</p> <p>This section sets out the Chamber's comments on the soundness of the proposed Local Plan and the proposed modifications to it.</p> <p><u>Soundness</u></p> <p>The Chamber broadly supports Policy SP20 which states that "The redevelopment and regeneration of existing employment sites for business uses will be supported", however this single line of text does not go into sufficient depth on how this will be achieved in line with NPPF policies pertaining to sustainable development. As a result, policy SP20 of the Proposed Local Plan could be considered not to be justified in accordance with the NPPF. This is exemplified by the Council's approach to the London Road Industrial Estate (LRIE), referenced in supporting paragraph 7.10 of the Local Plan which states the following:-</p>

“7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) will provide flexibility to the figures in the later part of the plan period. The redevelopment and regeneration of the LRIE is a long held vision of the Council and a recent decision by the Council’s Executive (June 2022) agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality. The site has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site, which at present is not optimum and does not provide an attractive environment for modern day use. The majority of the LRIE site falls within the London Road Industrial Estates DEA, an area designated for business uses. It is important to note that the DEA includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate but excludes the football ground. A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site. Due to the timing of this strategy and the site’s location within the settlement boundary of Newbury, the site has not been identified as a site allocation, however it does need to be recognised as an area of regeneration for its potential to deliver flexibility to the employment figures over the plan period.”

The Council’s current strategy for the regeneration of the LRIE is outlined within the London Road Industrial Estate Project Refresh report (Ref. EX4219), dated 9th June 2022. It seeks to create an LRIE Supplementary Planning Document (SPD) for the redevelopment of the site, rather than, for example, a site specific Local Plan allocation and accompanying Policy. It also provides a timeline for delivery, estimating the adoption of the SPD by the end of 2024, with both the depot site and playing field site redeveloped for employment use by 2026.

The reason that the policy might be considered not **justified** as it is not an appropriate strategy, and neither is it backed up by proportionate evidence. The redevelopment of a site the scale of LRIE, either comprehensively or through a series of linked and phased proposals, would be subject to significant detailed EIA work, due to several important constraints at the site, including flood risk, traffic etc. and should the site be developed in a piecemeal fashion then the appropriate strategic environmental investigation is likely not to occur and subsequent development will have to rely upon cumulative development requirements of the EIA Regulations 2027.

While this approach is consistent with national policy, the following paragraphs set out the Chamber’s recommendations to bring even further in line with national guidance and to ensure that the policy is positively and sustainably delivered.

In order to establish criteria to ensure that development or redevelopment of the site is sustainable, a comprehensive development-plan led policy framework which has been subject of Strategic Environmental Assessment (SEA) is suggested, an approach which does not appear to have been considered by West Berkshire Council. An SPD-led approach such as that proposed to be used for the LRIE site may not be able to achieve this and likely would not constitute an appropriate alternative.

Whilst LRIE is somewhat unique in the particular constraints that apply to that site, it highlights the need for the aforementioned development-plan led policy framework across the district’s principal employment areas to avoid unsustainable piecemeal development. Specific criteria-based policies for the principal employment areas should be written in a manner that encourages inward investment and provides an appropriate and positive policy context for the necessary infrastructure improvements.

We would like to see greater depth, into the policy approach, to securing – and ensuring – West Berkshire retains and identifies new employment land of sufficient quality and in locations that are attractive to investors to meet current and future needs.

In 2020 the AWE Burghfield Detailed Emergency Planning Zones (DEPZ) was extended under new REPP19 legislation. We understand there are potentially serious implications on employment land within the zone, including sites in Newbury, Theale, Aldermaston and nr Reading (Green Park). The Chamber would like to suggest that this should be seriously considered within the Local Plan and that the Council should work proactively with the AWE establishments to determine the full extent of any potential employment land impacts.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Yes

Please give reasons for your answer

4. Proposed Changes

Proposed Modifications
 In order ensure that the Local Plan is seen to be considered sound, the Chamber proposes the following modifications to facilitate an appropriate approach to development or redevelopment proposals at Designated Employment Areas across the district.
Site/Area Specific Policies
 The Chamber supports the West Berkshire Council’s aim of intensifying employment uses, along with the redevelopment and regeneration of existing employment sites for business uses. However, in order to ensure that proposals for this constitute sustainable development and are off sufficient quality to attract inward investment, the Chamber proposes that a series of positive and criteria led site-specific policies are included in the Local Plan for each

Designated Employment Area, which consider the relevant constraints and characteristics of each site. Continuing to use LRIE as an example, the following criteria would have to be included in any site-specific policies:-

- **Flood Risk:** The majority of the site is within Flood Zone 3, meaning a high risk of flooding. Any proposals for use or change of use should be required to undertake a sequential test in accordance with Policy SP6 Flood Risk. Stormwater attenuation measures and already existing opportunities to mitigate against the effects of flooding on site or in the vicinity should be considered positively. The size of LRIE is such that in the context of a comprehensive or phased redevelopment it would undoubtedly constitute EIA development within the context of the EIA Regulations 2017 and therefore requires a development plan i.e. site specific Local plan policy framework to set out the criteria that need to be addressed and met if sustainable redevelopment proposals are contemplated.
- **Climate Change:** Given the ongoing climate crisis, and especially the already measured and predicted effects of climate change in relation to weather & flooding, it is of paramount importance that any proposals for development or redevelopment in LRIE should satisfy the criteria of Policy SP5 Responding to Climate Change and any appropriate requirements that may be introduced by site specific Local Plan policy.
- **Biodiversity:** In line with the requirements of the Environment Act 2021, any development should be required to demonstrate a 10% Biodiversity Net Gain, meeting the requirements of Policy SP11 Biodiversity and Geodiversity.
- **Traffic Generation:** As any intensification of employment use at the site would result in increased amounts of traffic from the site, a set of criteria should be developed to ensure that the impacts of this are fully understood and mitigated against.
- Other site specific policy criteria should also be introduced to control the design, height, massing and land use mix of development or redevelopment proposals as may be appropriate.

These policies should clearly show the boundaries of the Designated Employment Areas with reference to the Proposals Map or other insert map as may be appropriate.

We do not believe it is the Chamber's responsibility to define the specific wording of the policies however we do believe that they would be effective in guaranteeing sustainable development and attract inward investment across West Berkshire's Designated Employment Areas.

Policy SP21 Sites Allocated for Employment Land

The Chamber supports the allocation of additional land for employment as part of this policy, and inclusion of criteria based specific allocations for these sites, in line with the latter half of the Local Policy Priority of **“Maintaining support to existing exporters and helping new businesses grow their trade activity”**, and the general objective of attracting inwards investment and regeneration in a post-Brexit economy.

SP23 Transport

The Chamber supports the application of the criteria in Policy SP23 to development which generates a transport impact, in line with the Chamber's Local Plan Priority of **“supporting appropriate local transport initiatives that strengthen confidence in travelling by public transport and lead to its sustained recovery”**. Furthermore, the policy should be referenced in any proposed site specific criteria for designated employment areas.

The proposed changes within the above representation also concern policies other than Policy SP20, but these have not been made the subject of additional representation forms as the changes are dependent on the content of the main representation on the policy.

Conclusion

These representations have outlined West Berkshire Chamber of Commerce's concerns as to the soundness of the Local Plan preparation process. The primary concern of WBCC is that the proposed policies regarding designated employment areas, in particular SP20 as exemplified by the Council's approach to LRIE, are unsound and do not go far enough to ensure that the development or redevelopment of DEAs across the district is sustainable and creates the best conditions for attracting inward investment. This is as well as the policies potentially not being appropriately justified. As they are, the policies run the risk of enabling piecemeal development at Designated Employment Areas which would result in a lower quality of land available for business use as well as potentially resulting in vital environmental investigation not being able to take place.

As such, various modifications have been proposed to ensure the soundness of the Local Plan. Most importantly, a development-plan and SEA led framework of criteria-based site specific policies for each DEA should be adopted which would guarantee that development or redevelopment is sustainable and can create the best conditions for inwards investment and regeneration. There have also been several wider minor comments and representations on other policies throughout the Local Plan.

To conclude, these representations have concluded that the Proposed Local Plan is potentially unsound and we therefore respectfully request that the sentiments of these representations be fully considered and reflected in further Modification to the submitted Local Plan.

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?
 * Yes
 * No

Yes

5. Independent Examination	We believe it is necessary as we are proposing modifications and the content of our representations is important.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Panattoni (Represented by Turley Associates)
Consultee Full Name	Mr Tony Watkins
Consultee Organisation	Panattoni
Agent Full Name	Taylor Cherrett
Agent Organisation	Turley Associates
Comment ID	PS1236
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	We do not believe the plan is legally compliant in relation to its assessment of employment provision within the Sustainability Appraisal.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The purpose of Policy SP20 is stated as setting a framework to facilitate and promote the growth and forecasted change of business development across the District over the plan period to 2039.</p> <p>The Policy sets out that "Through the LPR the Council will seek to facilitate the growth and forecasted change of business development over the plan period by promoting the supply of office and industrial space across the District to meet the identified shortfall."</p> <p>To inform the Local Plan Review (LPR) the Council undertook an Employment Land Review (ELR 2020) which was completed prior to the Covid 19 pandemic and prior to the UK exiting the EU. The Council therefore updated the ELR in 2022 using the most recent economic forecasts which take account of the major macro-economic changes which have taken place and provides up to date evidence.</p> <p>The key findings of the Employment Land Review Addendum (December 2022) are:</p> <ul style="list-style-type: none"> • A requirement of 91,109sqm or 23ha of industrial land to 2039 to meet identified needs. With 64,000sqm in the known supply, the report recommends the plan should look to accommodate a minimum of 155,000sqm of industrial floorspace to 2039 (resulting in the 91,109 sqm additional requirement). • The conclusion states that the floorspace requirement needs to be seen in the context of the whole plan period, and "Given the need to address a current market shortage for industrial space there is, unlike for offices, a more pressing need to frontload the plan with a readily available pipeline of space. So, we suggest that as much as possible of this 23ha minimum should be allocated on easily deliverable sites. No single site, devoid of major constraints has been identified through the HELAA that is capable of meeting the whole shortfall for industrial floorspace. Two sites are promoted that are generally unconstrained and cumulatively could bridge 8.2 ha of the quantitative gap. The balance to find reduces to a minimum 15 ha and a further 10 sites have been assessed as having potential for employment use subject to other policy considerations." • The report concludes that "should all other options fail to adequately meet demand, consideration should be given to providing new industrial floorspace as part of any potential large housing allocations, providing walk to work opportunities. Albeit this route would only deliver smaller and lighter units, but these are in demand, and viable in the East (Reading market area), although less so elsewhere." <p>The ELR review also states that:</p> <p>"the previous assessment identified that Theale's proximity to junction 12 of the M4 means that it is an attractive location for B8 distribution (specifically last mile servicing Reading). As supply has further tightened along the M4 corridor towards London demand for space close to motorway junctions, such as at Theale has increased since the previous assessment."</p> <p>The report states that West Berkshire has become "a viable location for largescale warehouse and distribution uses due to a dearth of availability elsewhere in the Thames Valley." There is an identified lack of available stock for last-mile distribution, with occupiers finding it difficult to satisfy their requirements.</p> <p>Panattoni wholly agree with this position.</p> <p>In addition, WBC prepared a Employment Background Paper (January 2023), which forms part of the evidence base to the draft plan. The report explains the approach taken by West Berkshire Council to employment land in the draft Plan. Sites considered for allocation to meet the requirement identified in</p>

the ELR (2022) were identified through the HELAA, which forms part of the evidence base for the Plan. The sites were then selected through the Site Selection Methodology Paper (January 2023).

The Employment Background Paper (2023) states “Since the publication of the Emerging Draft LPR in 2020 there have been a number of changes to the evidence and status of the identified sites which resulted in a review of all the HELAA sites and some changes to the sites proposed within the Regulation 19 Proposed Submission LPR.”

The updated evidence highlighted a shortfall in the supply of office floorspace over the plan period and so it was necessary for the Council to look again at the evidence and reassess all the HELAA sites promoted for employment use.

In addition, further technical evidence was gathered on the sites to assist in making an informed decision.

Based on the proposed employment land allocations in the draft Plan, there remains a shortfall of 32,709sqm of industrial land.

Panattoni Comments on Policy SP20

The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt and places significant weight on the need to support economic growth and productivity (paragraph 81).

It goes on to state at paragraph 82 that Planning policies should:

- 1 “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- 2 set criteria, or identify strategic sites, for local and inward investment to match the In a strategy and to meet anticipated needs over the plan period;
- 3 seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- 4 be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

The draft Local Plan Review is not considered to have been drafted to meet the policy bar set out within the NPPF for the following reasons.

It is concerning that no reference is made within the policy to the actual requirement / need for employment uses over the plan period. The ELR 2022 sets out a need for:

- 50,816sqm (minimum) of new office floorspace; and
- 91,109sqm (minimum) of new industrial floorspace.

These requirements should be enshrined in policy. Without the actual requirement identified there is no policy requirement for the employment need to be met. Without which the Policy cannot be considered to be positively prepared, effective or consistent with national policy. The policy requirement should also be treated as a minimum as set out within the evidence base.

The current shortfall in employment land should also be enshrined in Policy. This is to ensure that the policy proactively seeks to identify solutions and sets out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and clearly set out by the NPPF.

At present the policy simply does not achieve this.

This position is further exaggerated by the supporting Sustainability Appraisal (SA). The SEA/SA Regulations Schedule 2(8) requires an “assessment of reasonable alternatives” and the identification of the “reasons for selecting the alternatives tested in the light of the others available.” In *Ashdown Forest Economic Development LLP v SSCLG and Wealden DC* [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware “The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.”

The SA has not considered the impact of not meeting employment need, nor has it considered an Option where the employment need is met in full. The only options considered at a strategic level for economic development are:

- 1 Retain separate employment and town centre policies
- 2 Combine employment and town centre policies into a single policy

These options are not relevant to the consideration as to whether employment need has been met.

Panattoni consider that the Council's approach to considering the options for employment need is fundamentally flawed. The Council does not appear to have considered any scenarios in relation to the employment needs, whether that be the impact of the shortfall and meeting or exceeding the employment need over the plan period.

Further and in relation to Policy SP20 and specifically criterion 10, which assess whether policies “support a strong, diverse and sustainable economic base which meets identified needs”, the SA finds that “the policy is likely to have a positive / significantly positive impact on economic sustainability as it seeks to support the economic base.”

It is not clear how the SA can establish that Policy SP20 will have a positive affect. The evidence base supporting the Local Plan clearly establishes that there is a shortfall against identified employment need and the SA must find that the policy has a negative affect against this criterion because it does not meet or address that shortfall. The SA is flawed in its consideration of Policy SP20.

The SA is therefore fundamentally flawed in its consideration of Policy SP20 and employment need and the legal test for the consideration of reasonable alternatives has not been met.

	<p>Paragraph 7.9 of the Local Plan sets out that “whilst these allocations go some way towards meeting the identified need there remains a shortfall. As with the office requirement the Council has positively sought opportunities to meet the industrial requirement however, the District is heavily constrained and this has resulted in a lack of suitable available sites. Given the identified shortfall in supply the Council will commit to seek to address this matter again at the first five year review of the Local Plan.”</p> <p>We do not consider that the Council have positively sought opportunities to meet the industrial requirement. The fact is the Council have deleted a previous proposed allocation, specifically land at Hoard Way, Theale, a site which is free from statutory constraints such as AONB and located adjacent to the strategic road network. It has been deleted solely on landscape grounds, which we consider</p> <p>A review to meet this shortfall is not considered necessary, for the reasons set out in these representations other available land exists which can support the Council in meeting their employment need. Specifically land at Hoard Way, Theale.</p> <p>Notwithstanding our view that at least some of the shortfall can be met through the allocation of additional sites, the mechanism for a 5-year review is not included in policy. If a review is the means by which the Council are to meet the identified shortfall this also needs to be included as a policy requirement.</p> <p>In relation to the Policy wording itself, we believe this is overly restrictive, especially in light of the identified employment shortfall.</p> <p>The adopted Development Plan under Policy CS9 (Location and Type of Business Development), Point (a), highlights that in the absence of new employment allocations being identified through the adopted Development Plan, opportunities for employment development exist where the following policy requirements are satisfied:</p> <ol style="list-style-type: none"> 1 Compatibility with uses in the areas surrounding the proposals and potential impacts on those uses; and 2 Capacity and impact on the road network and access by sustainable modes of transport 3.39 <p>Similar policy provisions are required in the draft Local Plan to provide flexibility to meet the identified employment needs and respond to the current shortfall.</p> <p>Overall, Panattoni object to policy SP20 and consider it unsound. It has not met the tests of soundness as required by paragraph 35 of the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed employment allocation and that the LPR does not provide enough sites to provide sufficient employment land.</p> <p>We can assist the inspector in their consideration of the Local Plan and associated evidence.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Morgan, Paul

Consultee Full Name	Paul Morgan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1227
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	<p>The Berkshire Local Plan Review (Reg 19) Proposed Submission is totally disjointed and does take a holistic view and is not based on evidence. For example, no reference is made to the current situation at the Vodafone Campus where 3 very large purpose built offices will soon be empty. The same applies to Turnpike Estate, where the old Quantel factory will soon be vacant.</p> <p>London Road Industrial Estate / Faraday Road football Ground</p> <p>Over the past 5-10 years West Berkshire Council have spent £Millions of taxpayer's monies with external consultants / property developers such as St Modwen; Strutt & Parker; Avison Young, Hemmingway design, etc. with respect to the London Road Industrial Estate</p> <p>The A339 link road into the LRIE estate was built as part of the original scheme. The original budget was £2.9 million but the actual costs was over £5.2 million, funded by WBC, Thames Valley Berkshire Local Enterprise Partnership and the Dept of Transport</p> <p>As part of the LRIE scheme WBC prematurely and unnecessarily closed the Faraday Road Football Stadium, an Asset of Community Value (that has been there since 1963, and pre-dated the LRIE). The cost of closing the ground and funding replacement facilities (that would not be needed if the football ground remained) again runs into £ millions</p> <p>In June 2022 the Council signed of a further £850k for planning and consultancy to help deliver LRIE projects as part of another scheme called the London Road Industrial Estate Project Refresh (EX4219)</p> <p>Despite the £ millions already spent the policy that WBC has adopted clearly has spectacularly failed.</p> <p>The local plan should provide the Council with the opportunity to look again at the evidence and options that would deliver the most benefits to the public for a key location that is in central Newbury. By only referring to it in one paragraph Page 84: 7.10 it has to be assumed that the planning team are deliberately trying to avoid scrutiny from external parties to the mess that has been created and the lack of any deliverables for the huge sums spent.</p> <p>The London Road Industrial Estate Project Refresh (EX4219), published in June 2022 only covers 2 sites 1) the Depot site and 2) the football ground - "the Depot site redeveloped for employment use by end of 2024" and "the playing field site redeveloped for employment use by end of 2026.</p> <p>The football ground is NOT nor ever has been part of the LRIE - it is not a Designated Employment Area. The football ground should be treated on its own merits and NOT part of a "land grab" as part of a wider LRIE development proposal. The football ground is still classified as a football ground and has approved planning permission based on this status.</p> <ul style="list-style-type: none"> • 20/01966/COMIND – Renewal and expansion of the existing football pitch to form a new 3G main pitch and a smaller 3G training/practice pitch. • 20/01530/OUT – Outline permission for replacement of clubhouse and new spectator stand at Newbury Football Ground. Matters to be considered: Access and Layout • 21/07575/CERTE – Confirmation of lawful use of land as a football ground under class F2 of the Use Classes Order (Amendment 2020) <p>As such the football ground should NOT be subsumed as a land grab for the LRIE.</p> <p>The football ground is clearly and well defined within the current West Berkshire Core Strategy (2006 - 2026) Development Plan Document which was adopted in July 2012</p> <p>The principle policies in the Core Strategy that cover the football ground are:</p> <ol style="list-style-type: none"> 1 Area Delivery Plan Policy 2 Newbury (ADPP2) 2 CS18 <p>This local plan should provide as a minimum the same level of protection / status.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>The Local plan as it currently stands is, in my opinion, a poorly presented document and does not provide up to date evidence or sufficient detail to provide a sound basis for a local plan that will be in place until 2039. It appears rushed and ill considered in many areas. The public really should have had the opportunity to question and clarify directly with the authors at a "Town Hall" type presentation / exhibition / seminar.</i>
6. Notification of Progress of the Local Plan Review - The	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Wasing Estate (Represented by Pro Vision)
Consultee Full Name	The Wasing Estate
Consultee Organisation	The Wasing Estate
Agent Full Name	Sarah Pyne
Agent Organisation	Pro Vision
Comment ID	PS1753
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>We note that the council have a long history of under-provision of employment floorspace, including offices and industrial uses. The council's most recently published evidence base documents, including the West Berkshire Employment Land Review (ELR) Addendum December 2022 and the Employment Background Paper January 2023, once again identifies a significant shortfall in provision against identified need.</p> <p>As drafted, Policy SP21 allocates four sites (ESA1; ESA2, ESA4; and ESA6) for B2/B8 industrial uses, and two sites (ESA3 and ESA5) for Egiii/B2 (office/industrial) uses. Assuming sites ESA3 and ESA5 adopt a 50%/50% split of these uses, the total quantum of new employment floorspace to be provided for across the plan period is as follows:</p> <ul style="list-style-type: none"> • B2/B8 = 63,001 sqm • Egiii = 5,800 sqm <p>This is clearly significantly below the identified need for 91,109 sqm of industrial floorspace and 50,816 sqm of office space as set out at paragraphs 7.8 and 7.4 of the Draft LPR Proposed Submission Version respectively. The LPR is also clear that these demand figures are a minimum.</p> <p>As such, and at present, it is therefore considered that the plan does not meet the government's aims as set out within the NPPF to build a strong and competitive economy, particularly Paragraph 81 which states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.</p> <p>We note that our client's land at Larkwhistle Farm, Brimpton Common (ref. BRIM3) has not been identified as an allocated employment site, as promoted. The published updated Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) November 2022, states that:</p> <p>"Overall development of the site would have a neutral impact on sustainability. There is a positive impact on economic sustainability as the site is promoted for employment uses. There are a number of unknown sustainability impacts, especially in relation to environmental sustainability as the final use of the site is unknown.</p> <p>Mitigation measures would be required to ensure no negative impacts occurred, and in many cases could result in a positive impact. There are also a number of potential negative impacts on environmental sustainability due to the rural nature of the site requiring car use to access the site, as well as the loss of a greenfield site. Mitigation measures would be required."</p> <p>The Estate object to the council's approach not to allocate this site for much needed employment land on this basis. Firstly, whilst a 'brownfield first' approach is generally supported, it is evident that the lack of available, or suitable brownfield sites means that the council has a duty to consider greenfield sites as alternatives. Secondly, the NPPF paragraph 85 is very clear that in seeking to build a strong and competitive economy, the council should recognise that sites may have to be found in locations that are not well served by public transport:</p> <p>"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."</p> <p>As such, we object to the council's approach to selecting suitable sites as it is not consistent with national policy, nor does the LPR result in a positively prepared plan as it does not meet the objectively assessed needs for employment. The LPR is therefore unsound.</p> <p>Previous representations in respect of BRIM3 are appended for the Inspectors consideration (Appendix D) to highlight that this is a suitable location to accommodate new employment development. Whilst technically classified by the NPPF as a 'greenfield site', it is important to note that the site has been</p>

	<p>previously used for mineral extraction and the resultant land is of poor agricultural quality; development of this site would not, therefore, result in the loss of the best and most versatile agricultural land.</p> <p>We note that council's comments regarding opportunities to improve accessibility by foot, cycling or by public transport and wish to highlight that the Estate's adjoining land ownership means that there would likely be opportunities to facilitate pedestrian access to nearby local facilities through creating a connection to the public footpath network.</p> <p>In conclusion, The Wasing Estate have concerns over a number of the policies as drafted, and overall consider that the plan is not consistent with national planning policy, and particularly the council's strategy and approach in respect of new housing and employment development has not been fully justified. The LPR does not identify sufficient residential or employment sites to meet the district's housing and employment needs. Furthermore, as drafted a number of policies do not provide adequate flexibility and support to existing rural businesses to achieve a prosperous rural economy in West Berkshire. As a result, the Plan is not sound and should be modified to address the concerns in this letter prior to submission.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hope and Clay Construction Ltd (Represented by Pro Vision)
Consultee Full Name	Hope and Clay Construction Ltd
Consultee Organisation	Hope and Clay Construction Ltd
Agent Full Name	Sarah Pyne
Agent Organisation	Pro Vision
Comment ID	PS1580
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	03/03/2023 15:21:00
Attached Files	ProVision (Hope and Clay Construction)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>[See attached for Appendix A]</i> Background Hope & Clay Construction Ltd are located to the north of the existing Easter Park site, which comprises a variety of employment uses including office (Class E(g)) (formerly B1), light industrial (Class B2) and warehouses (Class B8), as well as sui generis uses for vehicle repair and MOT. Prior to the development of the business park, the site, formed part of a saw mill and charcoal works. To the east of the site lies managed woodland and the Pinelands caravan park, whilst to the north, approximately 90 metres from the site are a line of residential dwellings along Padworth Common. To the north-west of the site is AWE Aldermaston, a nuclear research site. Construction of the new Hope & Clay offices and warehouse finished in 2022 following approval by the Council in September 2014 for 1907 sqm of warehouse (B8) building and associated offices (B1a) for the storage of construction machinery and plant with associated access, parking and landscaping (ref. 14/01037/COMIND). At the time of approval, the council's Economic Development Officer considered that "If Hope and Clay Ltd are able to consolidate onto one site, it is very likely that the business will be able to grow and develop further, employing more people and contributing to the local supply chain."

Despite the site's long standing and existing use as an employment site, Easter Park is located in land outside of the defined settlement boundary and is not recognised within the adopted local plan as a Protected Employment Area as listed at Appendix G of the adopted Core Strategy. Currently, the adopted policy position for development at Easter Park is set out at Policy CS9 of the Core Strategy which states that, with regard to proposals outside of defined employment areas it states proposals for business/B8 uses will be assessed against compatibility with uses in the area surrounding the proposal and capacity and impact on the road network.

The Core Strategy Paragraph 5.46 also identifies a shortfall of B8 floorspace of approximately 24,000sqm in the district and a significant shortfall of 121,000 sqm of office space.

Housing and Economic Land Availability Assessment (HELAA) February 2020

Land adjacent to Easter Park ('Land off Benyon Road, Easter Park, Tadley') has been promoted for Employment (B1, B2 and B8) uses with an identified capacity of 8,400 sqm of floorspace. The assessment of the site was first set out within the Housing and Economic Land Availability Assessment (HELAA) in February 2020 (HELAA ref. ALD6).

Consistent with the methodology, the site was not automatically excluded from the site assessment at Stage 1b despite its noted location within the inner Atomic Weapons Establishment (AWE) Aldermaston planning consultation zone, with the document noting that "*Whilst the HELAA methodology identifies notified safety zones as an automatic exclusion criteria, it also states that the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. This assessment will be undertaken in stage 2 of the HELAA.*"

At Stage 2, the site's location adjacent to an existing employment (industrial) area was noted, as was the fact that this industrial estate is not a Protected Employment Area. Stage 2 concluded with: "*The proposed commercial use would have to be considered carefully with respect to management and control in an emergency due to its proximity to the AWE. Site is adjacent to an existing employment area, and so allocation would be dependent on a review of the District's employment needs through the Local Plan Review. Further information required on a number of matters, including highways and ecology, before a robust decision can be made.*" It was identified as being available, achievable and "potentially developable in part".

Local Plan Review 2020-2037 Emerging Draft December 2020

In December 2020 the council published their Local Plan Review 2020-2037 Emerging Draft, informed by a number of evidence base documents, including the HELAA (2020), the Employment Land Review (2020) the Western Berkshire Functional Economic Market Area Assessment (FEMA) (2016) and the West Berkshire Economic Development Needs Assessment (EDNA) (2016).

Draft Policy SP20 made provision for 62,00 sqm of office (Class E) floorspace and 65,000sqm of industrial, storage and distribution floorspace in the District over the plan period, seeking to address the shortage as outlined in the Employment Land Review (2020), which stated:

"We estimate that as a minimum 65,000 sq m of new floorspace should be provided for office use in the next plan... The Council should scope the next generation of policies so that, if market demand for offices strengthens, it is clear that the 65,000 sq m requirement is a minimum and policy is flexible and supportive for all forms of office development." (Paragraphs 10 and 11); and

"... Demand is also more pressing given the current market shortage, and there is a need to frontload the plan with 16 ha of easily deliverable sites. Four or possibly five potentially suitable sites are identified through the HELAA that are capable of meeting the need for industrial floorspace. All of these sites are extensions to existing employment areas, and these are in the main area of market demand in the east of the District." (Paragraph 12)

The findings of the Employment Land Review document (dated August 2020) prepared by Stantec in relation to industrial, storage and distribution floorspace also reflect earlier findings of the Berkshire Functional Economic Market Area Assessment (FEMA) and Western Berkshire Economic Development Needs Assessment (EDNA) produced in 2016. The executive summary of the EDNA concluded that: "*Demand for industrial space remains strong and very low levels of vacancy reflect a limited supply of industrial accommodation (particularly modern, good quality space). Development of new industrial space in the FEMA has been limited in recent years, with much of the existing stock relatively dated and in need of refurbishment. Local commercial property agents report that demand for industrial premises is currently outstripping supply, and an upward trend in industrial rental values in recent years has led to new speculative industrial development being just about viable within the FEMA. The key issue going forward is a lack of new land and/or space to accommodate new development.*"

Therefore it was clear that provision of additional floorspace proposed by draft Policy SP20, including through the creation of new Designated Employment Areas (DEAs) and extensions to existing DEAs, would go some way to meeting the overall demonstrated need.

Furthermore, the ELR (2020) made a series of recommendations to the council. This included to:

- Consider allocating the site for industrial uses ALD6 Land off Benyon Road, Easter Park, Tadley; and, furthermore;

Designate as (Protected Employment Areas (PEAs) Greenham Business Park, the Vodafone Campus, **Easter Park**, Langley Business Court, and the Old Mill Trading Estate. (Our emphasis added);

- It clarifies: "*The PEAs are designated for B class use, and their boundaries and role should be reviewed to achieve a balanced portfolio to meet future requirements. There is a general presumption for employment generating uses within the PEAs and against non-employment uses*"; and
- Para 4.155 of the ELR document recommends "*Easter Park – is a modern business park to the south-east of AWE Aldermaston, and comprises office, light industrial and warehousing activity. There is one small remaining parcel that has permission for warehousing. **The Park should be designated as a PEA.** Land adjoining to the northeast is promoted through the Call for Sites (ALD6*

2.1 ha), and is within an area of market attraction for employment uses, and we would support the inclusion of ALD6 within the Easter Park PEA designation.” (Our emphasis added).

As such, and following the recommendations of the EMR, Regulation 18 draft Local Plan Draft Policy SP21 ‘Sites allocated for economic development’ sought to a) classify formally Easter Park as an existing employment area by designating it as a ‘Designated Employment Area’ but also b) propose an extension of the site to achieve 8,400 sqm of new employment floorspace. The site was proposed as Site Allocation EMP3.

Draft Policy SP4 (and supporting Figure 3) identified that Easter Park in its entirety falls within the Detailed Emergency Planning Zone (DEPZ) of Atomic Weapons Establishment (AWE) Aldermaston, which are regulated by the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR). The draft policy stated that “*In the interests of public safety, residential development in the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) has advised against that development.*” It went on to state that consultation arrangements for planning applications within the DEPZ, for any new development that could lead to an increase in residential or non-residential population (thus impacting on the off-site emergency plan) will be undertaken with the Office for Nuclear Regulation (ONR).

As such it is considered that the proposed allocation of the site adjacent to Easter Park under Draft Policy SP21 was made with full regard to site’s location within the DEPZ and the Government Regulations related to Radiation Emergency Preparedness.

In support of the proposed allocation of the site for employment development in the draft Local Plan, and to address points raised in the HELAA, Hope & Clay construction submitted the following information to further demonstrate that the site is suitable for development:

- Preliminary Ecological Appraisal.
- Illustrative Masterplan.
- Transport Assessment.

The submitted Illustrative Masterplan showed how the proposed expansion of Easter Park, on land adjacent to the existing Hope & Clay site, would deliver approximately 8,245 sqm of employment floorspace (GEA) (broadly in line with the proposed allocation), made up of 3,745 sqm of class E(g) (formerly B1) floorspace; 2,160 sqm of class B2 floorspace; and 2340 sqm of class B8 floorspace, across five units, ensuring an appropriate balance between site coverage and site constraints i.e. the required restoration area/buffers/wayleave.

Representations to Local Plan Review Proposed Submission (Regulation 19) Consultation

The purpose of a Regulation 19 consultation is to ensure that the plan is legally compliant and sound. To ensure the local plan is sound, it should be:

- Positively prepared - Provides a strategy which, as a minimum, seeks to meet West Berkshire Council’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- Justified – ensuring that the Plan provides an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – ensuring that it is deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy - Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF) and other statements of national planning policy, where relevant.

It is in light of these criteria that the Local Plan Review Proposed Submission (Regulation 19) version has been considered.

Policy SP4 ‘AWE Aldermaston and Burghfield’ / Draft Policy SP20 ‘Strategic Approach to Employment Land’ / SP21 ‘Sites Allocated for Employment Land’

Representation are made in regards to West Berkshire Council’s proposed amendments to Policy SP21 which have since removed Easter Park as a proposed Designated Employment Area, and therefore remove EMP3 Land off Benyon Road, Easter Park as a proposed Extensions to Designated Employment Area. In short, the consultation revisions to Draft Policy SP21 confirm that West Berkshire Council are no longer proposing to allocate Easter Park as designated employment site, nor are they considering its extension for additional employment floorspace.

The published updated Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) November 2022, with regards to the site’s expansion, site ‘ALD6 Land off Benyon Road, Easter Park’, simply states that:

“The site will not be taken forward. The site is located within the AWE DEPZ and therefore, it is not considered suitable for development.”

As such, comments in respect of Draft Policy SP21 are interlinked with the council’s approach to new development within the DEPZ of Atomic Weapons Establishment (AWE) Aldermaston, as set out at Draft Policy SP4, and so the two are considered together below.

On 22 May 2019, the government introduced the new Radiation (Emergency Preparedness and Public Information) Regulations (REPPPIR) 2019 to strengthen the national emergency preparedness and response arrangements for radiological emergencies. In essence, the regulations are designed to provide a framework for dealing with a potential radiation emergency arising from sites such as AWE Aldermaston. Regulation 8 requires that the local authorities are responsible for setting Detailed Emergency Planning Zones (DEPZ) for nuclear sites where there could be a radiation emergency with off-site consequences, on the basis of the operator’s recommendations. Regulation 11 requires that the local authority must

prepare an off-site emergency plan for responding to such an emergency, within the DEPZ area. It is not disputed that the site at Easter Park is within the DEPZ of AWE Aldermaston. West Berkshire Council's website indicates that an Off-Site emergency plan is being developed in the Spring of 2023, but also states that this document is "not a public plan."

Paragraph 5.1.4 and Table 17 of the SA/SEA Environmental Report November 2022 provide the council's commentary on changes to Policy SP4 related to AWE Aldermaston (and Burghfield), including to suggest that any new development within the DEPZ will likely be refused (where previously this was limited to residential development), and state that changes "reflect new information on DEPZ and off-site emergency plans". It summarises that the changes are likely to result in negative impacts on social sustainability as the policy seeks to restrict development (residential and employment) from taking place within the DEPZ, and therefore, there will be impacts on the provision of housing, affordable housing and new employment opportunities in the area. We therefore consider this to be a fundamentally flawed approach, for reasons set out below.

In the first instance, it is important to note that the only change in circumstance to the council's assessment of the site at Easter Park has been the submission by Hope & Clay Construction Ltd of additional supporting information in respect of ecology and highways, in addition to a masterplan demonstrating how additional employment floorspace on the site can be suitably and realistically achieved.

The updated HELAA (January 2023) once again confirms (paragraph 2.22) that sites within notified safety zones (eg AWE Aldermaston) will not automatically be excluded and instead that "the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. Therefore sites within notified safety zones have gone through to Stage 2 of the HELAA (site assessment) and advice from the Ministry of Defence has been fed into the site assessments." Appendix 4 of the HELAA once again concludes that that the site is available, achievable and 'potentially developable'.

Therefore, it is evident the recommendation drawn by the SA/SEA 2022 is clearly inconsistent with the conclusions of the HELAA and the HELAA methodology, and **no clear reason has been provided by the council as to why this suitable employment site is ruled out purely because of its location within the AWE Aldermaston DEPZ.**

In respect of the site's location within the DEPZ, the Regulation 18 draft Local Plan was published for consultation after the REPPiR Radiation (Emergency Preparedness and Public Information) Regulations 2019 were revised, and therefore it is reasonable to assume that the Council would have taken account of these Regulations in the preparation of that plan and in the formal allocation of Easter Park as an Designated Employment Site, and in the allocation of adjacent land for its expansion.

At the time of preparation of the Regulation 18 draft plan there had been no increase in risk at AWE Aldermaston: in the AWE Detailed Emergency Planning Zone Report dated 4 March 2020 prepared by the Council's Emergency Planner Ms Richardson for Members of West Berkshire Council it was stated in Section 3 under the heading "risk management", that "It is important to note that there are no changes in activity on the AWE sites, and there is no greater risk to the public than before this legislation was introduced." This is repeated in the conclusion at paragraph 7.1. Subsequently, a further 'declaration of no change' for AWE Aldermaston was issued in November 2022.

Nevertheless, and importantly, the Regulations and the Guidance do not preclude development within the DEPZ. They do not state anywhere that development should be prevented from coming forward just because it is in the DEPZ. On the contrary, REPPiR Regulations recognise that the population within the DEPZ will naturally change within the life of the emergency plan hence why Regulation 12 of REPPiR requires the Council to, at intervals not exceeding three years, review and revise the emergency plan. The Regulations also envisage that development will come forward within the DEPZ, and there are many passages in the Guidance which acknowledge that development will take place in the DEPZ, particularly Paragraph 250: "In order to understand if a change in the local area necessitates a redetermination [of the DEPZ], the local authority should consider developments within or adjacent to the detailed emergency planning zone taking into account their potential impact on the effectiveness of the emergency plan."

As such, it is only the Council's role to consider whether the Proposed Development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint to development. In short, the REPPiR-19 does not support the Council's moratorium on development in the DEPZ.

In respect of the council's reference to new information regarding off-site plans, as this key piece of evidence has not been made publicly available, the approach to amending the local plan to prohibit development on this basis is unjustified. Nevertheless, Paragraph 13 of the appeal decision at Boundary Hall, Tadley in 2011 (a copy of the SoS decision is provided at Appendix A), confirms the Secretary of State's conclusion an off site plan is designed to be flexible and can be amended to accommodate the implementation of development proposals: "the Off Site Plan is designed to be flexible and extendable and that, while it is possible that the implementation of the application scheme would necessitate changes to the Plan, the evidence does not lead to the conclusion that the Plan would fail". (paragraph 13).

As such, we consider that the strategy is simply not justified or informed by the evidence, and that the council's misguided approach to the role of the REPPiR has significant repercussions to the delivery of much needed employment floorspace, and the objective of sustainable development, which includes balancing employment opportunities with providing new homes and conserving the environment. It is also considered that, given that the starting point for development should be that there is a presumption in favour of sustainable development (NPPF Paragraph 10), we do not consider that the Plan, particularly Policy SP4 (particularly in reference to development likely being refused) has been positively prepared.

The Council's approach risks undermining the long term viability of this existing and established employment site. Without recognition of its existing status, or enabling suitable opportunities for growth, the site is restricted by countryside policy; furthermore if it becomes unviable that businesses cease to operate from the site, the result will be a vacant, sterilized, previously developed site.

As stated above, the council have a long history of under-provision of employment floorspace, including offices and industrial uses. The council's most recently published evidence base documents, including the West Berkshire Employment Land Review (ELR) Addendum December 2022 and the Employment

	<p>Background Paper January 2023, once again identifies a significant shortfall in provision against identified need.</p> <p>As drafted, Policy SP21 allocates four sites (ESA1; ESA2, ESA4; and ESA6) for B2/B8 industrial uses, and two sites (ESA3 and ESA5) for Egiii/B2 (office/industrial) uses. Assuming sites ESA3 and ESA5 adopt a 50%/50% split of these uses, the total quantum of new employment floorspace to be provided for across the plan period is as follows:</p> <ul style="list-style-type: none"> • B2/B8 = 63,001 sqm • Egiii = 5,800 sqm <p>This is significantly below the identified need for 91,109 sqm of industrial floorspace and 50,816 sqm of office space as set out at paragraphs 7.8 and 7.4 of the Draft LPR Proposed Submission Version respectively. The LPR is also clear that these demand figures are a minimum. As such, and at present, it is therefore considered that the plan does not meet the government's aims as set out within the NPPF to build a strong and competitive economy, particularly Paragraph 81 which states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.</p> <p>Conclusion</p> <p>In conclusion Hope & Clay Construction Ltd object to the West Berkshire Council Regulation 19 submission version of the Local Plan Review (LPR) to 2039 on the basis that it has not provided an appropriate, evidence-based strategy for development. It is considered unsound for the following reasons:</p> <ul style="list-style-type: none"> • The LPR fails to recognise and support the growth of existing employment sites including Easter Park and risks undermining their success and viability, which is inconsistent with national planning policy; • There is a significant shortfall in employment land provision and the LPR does not identify sufficient additional employment sites to meet the district's employment needs in the context of a consistent under-supply. This is inconsistent with national planning policy; • The proposed removal of Easter Park and proposed extension (site ref. ALD6 - Land off Benyon Road, Easter Park) due solely to the location of these sites within the DEPZ of AWE Aldermaston, has been done so without due regard for the remit of the REPRIR (2019) regulations and is inconsistent with the available evidence base. We consider that complete change of position is not justified by the DEPZ issues, which does not represent a moratorium on development. We consider this strategy to be unjustified and draft Policy SP4 not to have been positively prepared. <p>As a result, the Plan is not sound and should be modified to address the concerns in this letter prior to submission. We trust this Statement clearly sets out our client's position at this stage and respectively request that the above is given due consideration as part of any examination into the West Berkshire Local Plan. Our client would like the option of participating in the examination of the plan to elaborate on these matters.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pittard, Matthew (Represented by Pro Vision)
Consultee Full Name	Mr & Mrs Mathew Pittard
Consultee Organisation	
Agent Full Name	Mr James Blake
Agent Organisation	Pro Vision
Comment ID	PS1704
Chapter / Policy / Appendix Number	Policy SP 20
Chapter / Policy / Appendix Title	Strategic approach to employment land
Order	69
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:19:00
Attached Files	Pro Vision - Mr & Mrs Pittard
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Currently, the adopted policy position for business development is set out at Policy CS9 of the Core Strategy 2006-2026 (adopted 2012). This policy states that, with regard to proposals outside of defined protected employment areas, proposals for business/B8 uses will be assessed by the Council against the compatibility with uses in the area surrounding the proposals and the potential impacts on those uses and the capacity and impact on the road network and access by sustainable modes of transport.</p> <p>The Core Strategy at paragraph 5.46 identifies a shortfall of B1 floorspace by approximately 121,000sqm and a potential shortfall in the longer term of B8 floorspace of approximately 24,000sqm. It is noted the Council “seeks to ensure that sufficient sites are provided in the right locations to foster sustainable economic growth. This means maintaining a portfolio of sites available to meet demands for B8 in suitable location... and facilitating the growth of B1 floorspace to meet future requirements”.</p> <p>This policy seeks to make provision for business development comprising offices, industrial and storage and distribution where they are located on sites allocated for business development, on a suitable site within a settlement boundary, within a Designated Employment Area (DEA), on previously developed land within existing suitably located employment sites or within the countryside provided the proposal is in accordance with other relevant policies within the LPR.</p> <p>Paragraph 7.16 identifies that the “District has a vast rural area that is host to a large number of small and medium sized enterprises which are vital to providing job opportunities and a diverse economy. The LPR therefore seeks to support appropriate new or expanding businesses in the countryside”.</p> <p>Further, paragraph 7.20 explains that “business development within the district is dominated by small and medium sized units. Demand for such accommodation is likely to be met through smaller individual sites and within multi-occupancy employment areas. The Council will encourage the provision of small and medium sized businesses, including flexible workspace which enables businesses to start, develop and thrive in West Berkshire”.</p> <p>This appears to be a sensible approach and allows for flexibility in the delivery of employment land across the District.</p> <p>It is noted that in December 2020, the Council published their Local Plan Review 2020-2037 Emerging Draft, informed by a number of evidence base documents, including the HELAA (2020), Employment Land Review (ELR) (2020), the Western Berkshire Functional Economic Market Area Assessment (FEMA) (2016) and the West Berkshire Economic Development Needs Assessment (EDNA) (2016).</p> <p>Draft policy SP20 sought the provision of 65,000sqm of industrial, storage and distribution floorspace in the District over the plan period, to address the market shortage outlined in the ELR (2020), which identified that:</p> <p>“Demand is also more pressing given the current market shortage, and there is a need to frontload the plan with 16 ha of easily deliverable sites”.</p> <p>The findings of the ELR (2020) in relation to industrial, storage and distribution floorspace also reflect the earlier findings of the FEMA and EDNA, both produced in 2016. The executive summary of the EDNA finds that:</p> <p>“Demand for industrial space remains strong and very low levels of vacancy reflect a limited supply of industrial accommodation (particularly modern, good quality space). Development of new industrial space in the FEMA has been limited in recent years, with much of the existing stock relatively dated and in need of refurbishment. Local commercial property agents report that demand for industrial premises is currently outstripping supply and an upward trend in industrial rental values in recent years has led to new speculative industrial development being just about viable within the FEMA. The key issue going forward is a lack of new land and/or space to accommodate new development”.</p> <p>It is therefore fundamentally clear that the provision of additional floorspace proposed by draft policy SP20 would go a significant way towards meeting the overall demonstrated need. Furthermore, the ELR (August 2020) made a series of recommendations to the Council, which included:</p> <ul style="list-style-type: none"> • Over the 2020-2036 plan period, planning for a minimum 11 ha (65,000 sqm for office uses and a minimum 16 ha (62,000 sqm for industrial uses. • Consider identifying additional land and examining the potential of housing sites to secure an element of new office or industrial space. <p>The ELR at paragraph 4.64 concludes in relation to the office market that the office market is currently performing reasonably well but due to a lack of new build development there is a lack of modern purpose-built stock.</p> <p>Regarding industrial space, paragraph 4.95 confirm that there is demand from a mix of local and larger companies serving the area, as well as national occupiers.</p> <p>The ELR Addendum (December 2022) identifies at paragraph 4.30 that there is just a single office unit available in Thatcham which is not particularly attractive to modern office requirements. Demand from a mix of local and larger companies remains the same for industrial space (paragraph 4.59), with available units having fallen slightly (Table 4.22).</p> <p>Paragraph 4.76 highlights that “despite new development occurring in Thatcham... there is an acute shortage in many of the size ranges”.</p>

	<p>Appendix C (Sites' Assessment) identifies 'Land at Lower Way Farm' (HELAA ref. THA9) as being commercial and residential, being within the built up area and having 'good' prospects in terms of attractiveness to occupiers. It is considered to achieve a 'reasonable compatibility with surrounding uses' and scores reasonably overall.</p> <p>The recommendation recognises the site currently supports some small scale employment activity and has good access to the A4 and would likely be attractive for light industrial/workshop type premises/uses, but only on a small scale.</p> <p>Paragraph 7.7 of the LPR notes that there is a lack of supply of suitable sites for office development and "little to no viability in the market at present". The Council therefore seeks to promote the supply and refurbishment/upgrading of existing offices. Policy SP20 removes the requirement for office developments within Designated Employment Areas (DEAs) and promotes the redevelopment and regeneration of existing employment sites for business development.</p> <p>Paragraph 7.8 highlights that "The provision of industrial space has been consistently strong over recent years, and both trend-based projections and economic forecasts indicate growth in industrial space. The ELR 2022 therefore recommends a minimum industrial requirement of 91,109sqm or 23 ha of land to 2039 to meet identified needs".</p> <p>The main focus for the provision of industrial space is through the regeneration of the London Road Industrial Estate (LRIE) and is expected to provide flexibility to the need figures in the later part of the plan period. However, focusing industrial development primarily in one area is concerning and does not allow for other suitable and sustainably located sites to come forward which would be able to make an important contribution to meeting the identified needs of the District.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	To ensure that the views of our client in respect of 'Land at Lower Way Farm, Thatcham' and the shortcomings identified in the Local Plan Review and its evidence base relation to the allocation of sites and land for housing and economic delivery are heard
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Policy SP 21 Sites Allocated for Employment Land

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS173
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It is inferred from the text that the Council plans the use of DEA's to restrain the currently malign use of Permitted Development Rights to convert business premises to residential use in disregard of local plans. If correct, that intention is strongly supported.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Walker Logistics Ltd (Represented by Pegasus Planning Group Ltd)</p>
<p>Consultee Full Name</p>	<p>Philip Walker</p>
<p>Consultee Organisation</p>	<p>Walker Logistics Ltd</p>
<p>Agent Full Name</p>	<p>Jim Tarzey</p>
<p>Agent Organisation</p>	<p>Pegasus Planning Group Ltd</p>
<p>Comment ID</p>	<p>PS412</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 21</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Sites Allocated for Employment Land</p>
<p>Order</p>	<p>71</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	<p>E-Mail</p>

* Web * Unknown	
Response Date	01/03/2023 12:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Draft Policy SP21 sets out the sites allocated for employment land and identifies the approximate floorspace and use(s).</p> <p>Land West of Ramsbury Road is identified as ESA2, for 10,381sqm of B2/B8 floorspace. Supporting Paragraph 7.25 states:</p> <p><i>"The ELR outlines that to support the creation of local job opportunities in the more western rural areas, DEA boundaries could be extended at Membury Industrial Estate. Membury has seen a number of redevelopments and expansions, including outline planning permission granted for industrial use on one of the two proposed allocated sites (ESA2). The allocations sites at Membury (ESA2 and ESA3) and extending the DEA boundary will aid in addressing a local and rural demand".</i></p> <p>It is noted that the Regulation 18 version of the LPR proposed to allocate Land West of Ramsbury Road for 27,600sqm of industrial, storage and distribution uses. Thus, the Regulation 19 version of the LPR seeks to significantly reduce the amount of floorspace (and site area) allocated for employment land. To confirm, we do not agree with this approach.</p> <p>The Employment Background Paper explains that the LPR identifies a total employment land supply of 58,400sqm, across 5no. sites (footnote: MID5, LAM10, BEEN3/5, BEEN10 and PAD4). LAM6 (Land West of Ramsbury Road) is not included in the total supply of employment land as it is already counted</p>

	within the committed supply and therefore cannot be counted as an additional contribution to meeting the employment land requirement. This is the correct approach, which we do endorse.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Walker Logistics Ltd (Represented by Pegasus Planning Group Ltd)
Consultee Full Name	Philip Walker
Consultee Organisation	Walker Logistics Ltd
Agent Full Name	Jim Tarzey
Agent Organisation	Pegasus Planning Group Ltd
Comment ID	PS408
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 12:45:00
Attached Files	Jim Tarzey (Walker Logistics) Attachment.pdf Jim Tarzey (Walker Logistics) Economic Report.pdf Jim Tarzey (Walkers Logistics) Landscape Impact Justification Jim Tarzey (Walker Logistics) Indicative Scheme.pdf
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Walkers are promoting a site for allocation through the LPR, for industrial, storage and distribution uses (Use Class E(g)(iii), B2 and B8). The extent of the site is included in Appendix 1 <see attachment> . Land within the red line land extends to 20.9ha. The site is located to the west of Ramsbury Road, approximately 0.5km south of the M4 motorway. The site comprises: <ul style="list-style-type: none"> • Agricultural fields. • Woodland. • Landscaped strips. • Membury airfield runway (disused). • The existing premises of Walker Logistics (footnote: Walker Logistics is a family-owned business. It was founded in 1999 and predominantly comprises an e-commerce fulfilment company focusing on the picking and packing of internet orders, which are then grouped and despatched at the end of each day) In terms of the Adopted Development Plan, the site is located outside of any defined settlement boundary and is defined as 'Countryside' under Policy ADPP1 of the Core Strategy. The site is within the North Wessex Downs Area of Outstanding Natural Beauty ['AONB']. The site is bounded to the north by existing commercial and industrial buildings (Jacquet Weston Engineering and a Trinity Grain Silo and Storage Depot). To the south is agricultural fields. To the east is Ramsbury Road. A small number of individual residential properties are located further to the east and to the north east of the site. To the west is agricultural fields/woodlands. Outside of the site boundary are commercial buildings (Andy Godwin, Accident Repair Centre). It is noted that an application (Ref. 21/03083/COMIND) for 'change of use of land to Class B8' was granted on 23rd September 2022. This is for the site to the north.

Areas to the north and south of the site are designated in the Local Plan as within a 'Protected Employment Area' (Membury).

Background to Local Plan Promotion

On behalf of Walkers, Pegasus submitted to the 'Call for Sites' between December 2016 and March Subsequently, Pegasus submitted to West Berkshire Council ['WBC'] a 'Housing and Economic Land Availability Assessment (HELAA) Site Submission Form' under the Call for Sites in November 2018.

WBC published The Employment Land Review ['ELR'] in August 2020. It assessed future demand for employment floorspace, as well as existing and committed future supply. The study also identified floorspace/ land requirements to address unmet need. It stated that there is a gross demand of 62,000sqm for industrial floorspace and 16ha of new land is needed to meet future demand over the Plan period.

With regards to the current site (identified as 'LAM6'), the ELR stated at Paragraph 6.65 (emphasis added):

"A fifth site that could be suitable for industrial use is Land West of Ramsbury Road, Membury (LAM6). It is located within the western part of the District, which has generally low market attractiveness, but is immediately adjacent to the Membury industrial estate area that is fully occupied, and has experienced a number of redevelopments and expansions in the past to allow existing local businesses to grow supporting the rural economy. The continuing demand for space for local businesses is illustrated by the planning application currently under consideration for a large warehouse unit (plus D1 space) on the LAM6 site. To support the rural economy, part or all of this 6.9 ha site could be considered for allocation for employment use, albeit that the site is within the AONB designation. The site has the potential to provide the smaller units (circa 500 sq m) that the market assessment identifies are in particular short supply and that are in demand throughout the District. It is relevant to note that the 16 ha industrial requirement is a minimum to meet the need, there could therefore be merit in allocating the whole of the site."

The ELR recommended that the Council 'consider allocating 'Land West of Ramsbury Road, Membury' [LAM6] for industrial uses.

WBC published the West Berkshire Housing and Economic Land Availability Assessment in December 2020. The site [LAM6] was identified as available, achievable, and potentially developable. The supporting 'interactive map' identified the area that is 'potentially developable', as shown in Figure 1 <see attachment>.

WBC consulted on the Regulation 18 version of the LPR between December 2020 and February Draft Policy SP21 (Sites Allocated for Economic Development) included 4no. sites for allocation, including 'Land West of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands' [EMP5] for 27,600sqm of industrial, storage and distribution uses.

WBC did not update the Policies Map in support of the Regulation 18 version of the LPR. However, WBC Planning Policy Officers informed us that the possible extent of the designation is 'in line with the proposed developable area as promoted'. They attached a map; the area accords with that set out in Figure 1 <see attachment>. Please see correspondence in *Appendix 2* <see attachment>.

On behalf of Walkers, Pegasus Group submitted representations to the Regulation 18 version of the Local Plan Review in February 2021. These representations set out our support for the proposed allocation and noted that it would form a natural, high-quality extension to the protected Employment Areas in the site's vicinity.

To confirm that the intention is for the site to be allocated for industrial, storage and distribution uses.

Planning History

Outline Planning Permission (Ref. 19/02979/OUTMAJ)

In May 2021, outline planning permission (Ref. 19/02979/OUTMAJ) was granted at 'Land South of Tower Works, Lambourn Woodlands, Hungerford' [the 'outline planning permission']. This comprises part of the current site being promoted in the Emerging Local Plan. Please see **Appendix 3** <see attachment> for a Site Location Plan.

The outline planning permission was for the below description of development:

"Outline application for the erection of a new logistics warehouse building (for occupation by Walker Logistics) (Use Class B8) with ancillary office floorspace, an aircraft museum building (Use Class D1), and associated access, car parking and landscaping. Matters to be considered: Scale"

The outline planning permission provides a framework for the details of future reserved matters application(s) through the following conditions:

- Condition 3 (Indicative Plans) – This states that the layout of the site is to be in broad accordance with the Indicative Block Plan (Drawing Ref. 03100-00-C).
 - Condition 3 also states that the building shall be a maximum of 12.6m in height.
- Condition 5 (Maximum Floor Areas) – This sets out the below maximum floor areas, for different elements of the proposal:
 - Museum and military vehicle storage area – 2,180sqm.
 - Class B8 storage and distribution warehouse – 9,060sqm.
 - Ancillary office area – 1,150sqm.
 - Ancillary welfare and security area – 180sqm.

The Committee Report for Ref. 19/02979/OUTMAJ stated (own emphasis):

"In the case of consideration of this application your officers have carefully evaluated the environmental impacts of the development of the site for the proposed use against the associated economic benefits of doing so. While it is important to note that the NPPF states that major development in the AONB should only be supported in exceptional circumstances, it also states that significant weight should be afforded to the need to support economic growth and productivity. The application has identified a need

for this form of development and a shortfall of available space in the District to support it. As such, on balance officers accept the exceptional need for the development, and recommend that the application is approved."

It is clear from the Officer's Report and subsequent grant of Ref. 19/02979/OUTMAJ that the Council accepted that there was an exceptional need for additional industrial floorspace and that the proposed building's location in the AONB was not a bar to development.

Reserved Matters Application (Ref. 22/00897/RESMAJ)

An application for reserved matters ['RMA'], pursuant to the outline planning permission, was submitted and validated (Ref. 22/00897/RESMAJ) in April 2022. This was for the below description of development:

"Approval of reserved matters following Outline application for the erection of a new logistics warehouse building (for occupation by Walker Logistics) (Use Class B8) with ancillary office floorspace, an aircraft museum building (Use Class D1), and associated access, car parking and landscaping. Matters to be considered: Access, Appearance, Landscaping and Layout."

This was granted on 14 February 2023.

Council's Latest Evidence Base

WBC have published documents that form the evidence base for the LPR. Those of most relevance are summarised below.

Employment

The Council have published:

- Employment Land Review (August 2020).
- West Berkshire Employment Land Review Addendum (December 2022).

The relevant extracts of the Employment Land Review (August 2020) are summarised above.

The key findings of the West Berkshire Employment Land Review Addendum (December 2022) comprise (own emphasis):

- The (industrial) market is very tight in Hungerford, and when space does become available it is re-occupied.
- Demand for industrial space has increased since the previous assessment, while supply has continued to fall, placing further pressure on the existing stock market. Overall, there remains an acute shortage of good quality space.
- The industrial requirement is 91,000sqm (or 23ha).
- The scope for employment use (industrial) at LAM6 (land west of Ramsbury Road, Membury) has been confirmed through the 2021 planning permission.
- The industrial land requirement identified in this Addendum is a minimum.

- 1 Given the need to address a current market shortage for industrial space there is a more pressing need to frontload the plan with a readily available pipeline of space. So, we suggest that as much as possible of this 23ha minimum should be allocated on easily deliverable sites.

Landscape

The Council have published Landscape Sensitivity and Capacity Assessments ['LCA']. These seek to ascertain if development would result in harm to the natural beauty and special qualities of the AONB. The LCA of relevance to these representations comprises 'LAM6: Land West of Ramsbury Road, Membury Industrial Estate' (September 2021).

This concludes that Areas A and B (see Figure 2 <attached>) have potential for development. It concluded that the airfield runway is inappropriate for development.

Employment Background Paper

WBC published an Employment Background Paper (January 2023). This is described as *"an informal background paper that assists in the understanding of the employment evidence base and employment policies that are contained within the LPR"*.

It states (own emphasis):

- The industrial requirement to be accommodated is c. 91,000sqm and at a plot ratio of 40% coverage, this equates to a land area of 23ha. This is higher than the 62,000sqm or 16ha requirement identified in the ELR 2020.
- The evidence in the Landscape Sensitivity and Capacity Assessments (LCA) fed into the process of seeking to allocate sites. The Assessments prepared for individual sites within the North Wessex Downs AONB recommend landscape buffers to ensure development would fit with the existing pattern of the landscape as well as to bring landscape enhancements. These buffers reduce the area of the individual sites considered appropriate for development.
 - LAM6 is identified as having a site area of 6.98ha, with a developable area of 4.4ha, and a land supply of 10,381sqm.
The Council state that they are committed to a five-year review and 'is taking positive and proactive action to seek opportunities for additional employment land to come forward'.
- The Council identify a requirement for 91,109sqm of industrial floorspace (as identified in the ELR Addendum) and a supply of 58,400sqm. LAM6 is excluded from the employment land supply, as it is already counted within the committed supply.
- Thus, there is a shortfall of 32,709sqm of industrial land.

The Council state that they are committed to a five-year review and 'is taking positive and proactive action to seek opportunities for additional employment land to come forward'.

Proposed Site Allocation

The Policies Map, which displays the policies contained within the Proposed Submission (Regulation 19) LPR, allocates the site as within (see Figure 3 <see attachment>):

- AONB.
- Designated Employment Area ['DEA'] (in part).
- Employment Allocation (in part).

The extent of the DEA is shown in further detail in Map 9 in Appendix 1 of the Employment Background Paper (see Figure 4 <see attachment>).

The extent of the employment allocation is shown in further detail in the map that supports Draft Policy ESA2 (see Figure 5 <see attachment>).

Therefore, the DEA and site allocation only covers the land which benefits from outline planning permission (Ref. 19/02979/OUTMAJ), and for which reserved matters approval (Ref. 22/00897/RESMAJ) was granted on 14 February 2023. The extent of the boundary has been reduced from that assessed in the HELAA (and identified as 'deliverable') and from which WBC Planning Policy confirmed was allocated in the Regulation 18 version of the LPR (under Draft Policy EMP5); the area covered by the runway has been omitted.

Indicative Scheme

We have enclosed a drawing (22021-SK-103) [**Appendix 4 <see attached>**], which demonstrates how a scheme could be delivered on the site allocation set out in the Regulation 18 version of the LPR (i.e., the boundary which includes the airfield runway).

For completeness, the scheme includes the extant consent (Ref. 19/02979/OUTMAJ) for the new logistics warehouse building. In addition, 5no. buildings are shown to the west, along with associated car parking and access, as well as a landscape buffer further to the west. Excluding the extant consent, the scheme would deliver a total Gross External Area ['GEA'] of 21,491sqm across 17no. units (which range in size from 322sqm to 3,798sqm) for industrial, storage and distribution uses.

WBC's Employment Background Paper identifies that there is a shortfall of 32,709sqm of industrial land. Therefore, the proposed scheme would make a significant contribution in helping to address this shortfall (reducing it by 34%, to 11,218sqm).

The scheme has been informed by advice from Savills on market demand. The unit sizes shown are in demand within the regional market (of Oxford/Newbury/Swindon). There is the potential to provide for small medium enterprises within smaller units. It is therefore considered that the units proposed reflect the target audience and occupier demand. To confirm, it is not anticipated that the scheme will be occupied by Walker Logistics themselves, but it will be available to the market for other industrial, storage and/or distribution uses.

The proposed scheme would provide much-needed supply to the immediate locality. Within the smaller sub-15,000 sq ft size range, at the end of Q4 2022 according to Savills, there was one available unit within a 5-mile radius, comprising 1,504 sq ft which has subsequently been occupied.

Increasing this radius to 10 miles to include the eastern boundary of Swindon and western boundary of Newbury, there were 9 available units available at the end of Q4. There is demonstrably a considerable under-supply of small, light industrial and warehouse units, forcing many local businesses to re-locate.

It is noted that WBC have reduced the area of the site considered appropriate for development, from that assessed in the HELAA and allocated in the Regulation 18 version of the LPA, as a result of the evidence in the LCA.

A Landscape Visual Appraisal ['LVA'] has been prepared, to assess the visual and landscape impact of developing the area allocated in the Regulation 18 version of the LPR, and the potential impact of the Indicative Scheme.

This concludes:

- The site is considered to have very limited visual relationship and inter-visibility with the surrounding and adjacent areas and the wider AONB landscape.
- The site is of low visual sensitivity.
- The woodland buffer on the western edge, shown on the Indicative Scheme, would be as effective in screening views in and out as the currently present maturing woodland that marks the edge of the main north to south landing strip.
- The allocation of the (wider) site would not cause any undue harm to the visual amenity or appreciation of the AONB landscape, that cannot be mitigated against.
- The Council's published Assessment does not represent the correct landscape character baseline (as it does not consider the approved outline application Ref. 19/02979/OUTMAJ(footnote: This is a omitted scheme, in planning terms, and one which the applicant intends to be built in 2023/24.)).
- The site comprises an already transformed landscape, of the former airfield, and the hardstanding of the southern runway could be utilised as building platforms.

The LVA demonstrates that a larger site allocation would not bring any undue harm to the visual amenity or landscape character of the AONB, utilises landscape that has already been transformed and is influenced by the existing facilities nearby, and is well enclosed and integrated into the receiving landscape.

Thus, it is appropriate to allocate the whole site promoted by Walkers.

Economic Benefits

The economic benefits of allocating the site (including the former airfield) are summarised in the submitted 'Economic Benefits of proposed Expansion of Activities at Walker Logistics' Report. This concludes:

- The proposal will create economic benefits during the build phase and once it is operational.
- Allocating the airstrip at land west of Ramsbury Road could deliver a further 21,419sqm of industrial floorspace, which would bring the allocated industrial sites in the LPR almost in line with the recommended requirement of 91,109sqm in the Employment Land Review.

Conclusion

The inclusion of the site at 'Land West of Ramsbury Road, Membury Industrial Estate' as an allocated employment site is fully supported. However, the boundary of the allocation should be extended to include

	<p>the former runway. This would continue to ensure that the site allocation forms a natural, high-quality extension to the DEAs in the site's vicinity and development would result in significant socio-economic benefits. More importantly, it would help WBC to meet their identified need for industrial floorspace, which the LPR fails to do and therefore cannot be found to be sound.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Full Response (inc. Appendices 1-4) • Indicative Scheme • Landscape Scheme • Landscape Impact Justification • Economic Report
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Orr-Ewing, Robert
<p>Consultee Full Name</p>	Robert Orr-Ewing
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS251
<p>Chapter / Policy / Appendix Number</p>	Policy SP 21
<p>Chapter / Policy / Appendix Title</p>	Sites Allocated for Employment Land
<p>Order</p>	71
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Web

Response Date	24/02/2023 17:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The AONB in West Berkshire is under threat, and the Council needs to take steps to safeguard it. Currently the proposed development of the Membury Industrial Estate threatens residents by permitting increased traffic down the B4000; it threatens pollution levels by the increased traffic; it invites further accidents on the B4000 (there have been two in the last couple of months); it puts at risk the AONB, and makes living in this part of the area unattractive and unappealing.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	WBC needs to take traffic-calming measures, such as flashing signs, chicanes, speed limits enforced by cameras, and to block the use of lorries over 7.5 tons.
5. Independent Examination - If your representation is seeking a change, do you consider it	No

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	King, Anthony
Consultee Full Name	Anthony King
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS334
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 12:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Many proposals in the Review are outside or contrary to the Council's own strategic and operational Policies.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Some of the sites proposed for Industrial Development are against Environmental Policy, Employment Policy and are Unsustainable.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	The removal of sites LAM 9 and 10 as Industrial Development Sites will make the LPR legally Compliant. They both fail to meet the Council's Sustainability Targets.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I wish to attend the Oral Hearing as the Chairman of the Woodlanders Protection Group and on my own account. This will be to explain the basis of the challenge to the use of AONB land, 1) with no suitable and sustainable transport access! 2) with no Environmental Impact Assessment 3) with minimum benefits to the local economy and little local employment to justify the removal of AONB land. 4) with the use of non-standard and possibly illegal processes for the examination of the Environmental Impacts of any proposed developments
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Anderson, Alexander
Consultee Full Name	Alexander Anderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS274
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:34:56
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	No

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>I am particularly concerned that no Environmental Impact Assessment has been carried out on the Membury Industrial site which has expanded hugely, especially over the previous eight years.</p> <p>This has led to an intolerable increase in the traffic on this rural road network which affords no regard for the residents who live here. There is no public transport in the area, which along with a complete lack of cycle lanes, means that the impact on the traffic on the network is beyond its capacity. These roads are dangerous and further development will only increase this danger.</p> <p>The economic arguments for increasing the industrial development at Membury do not outweigh the environmental impact on the local environment. This is an ANOB, yet that does seem to be taken into consideration when driving the industrial development on. Indeed it seems to go against the Government's desire to protect these areas leading to the rural character of this area being destroyed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>(25). Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).</p> <p>I would suggest that the local community and local nature partnerships have not been consulted with reference to the industrial development at Membury.</p>
<p>4. Proposed Changes</p>	A full Environmental Impact Assessment needs to be carried out on the whole of the Membury Industrial Site before further development, which expands onto the ANOB, is allowed.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	West Berkshire Council as landowner
Consultee Full Name	Sam Robins
Consultee Organisation	West Berkshire Council as landowner
Agent Full Name	
Agent Organisation	
Comment ID	PS690
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 13:14:37
Attached Files	LRIE DEA extension.png
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	Yes

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>Propose extension of London Road Industrial Estate Designated Employment Area to cover land to the south currently comprising a playing field, a car park and open space - see area shaded in green in attached plan.</p> <p>This is in line with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at https://info.westberks.gov.uk/lrie</p> <p>Propose additional paragraphs in the supporting text to align with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at https://info.westberks.gov.uk/lrie:</p> <p>7.29 The London Road Industrial Estate has scope for intensification of employment use within the plan period to maximise the potential of the site. Some mixed use development may be appropriate, provided that no net loss of employment floorspace results from that development.</p> <p>7.30 The Council-owned London Road Industrial Estate (LRIE) currently has an estimated 23,000 sqm of employment space (Avison Young Development Brief 2020) occupied by 36 businesses that employ about 300 people. Following a review taking into account evolving economic drivers, market demand and the district's ambition to be carbon neutral by 2030, a revised Delivery Strategy for LRIE approved by Executive on 9/6/22 aims to increase employment floorspace on the site by at least 30%, safeguard 300 jobs and create at least 200 new jobs by 2030.</p> <p>7.31 The Council as freeholder will work with leaseholders to deliver environmental enhancements on the site including on carbon net zero, nutrient neutrality, sustainable drainage and biodiversity net gain. Further details to be set out in an LRIE Place-making Strategy which will be submitted as a Supplementary Planning Document in due course and progressed through the statutory planning process in parallel with the Local Plan Review.</p> <p>7.32 The Council as landowner is promoting alternative provision outside the LRIE to mitigate the loss of the playing field. This approach is supported by Sport England and aligns with the Council's Playing Pitch Strategy. The exact location of the alternative provision will be determined at the point at which a planning application for redevelopment of the playing field is submitted, accepting that it is for the statutory planning process to determine whether or not redevelopment of the former football ground should be permitted.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
5. Independent Examination	To represent the rationale of the proposal.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Windridge & Paul Whitford, Helen
Consultee Full Name	Helen Windridge&Paul Whitford
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS656
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing as we are residents living in Lambourn Woodlands, and we have concerns around the proposed industrial development at Membury. This is already an extremely busy industrial site and further development will greatly affect the local community;</p> <p>causing an increase of traffic on our rural networks which are already currently overloaded with vehicles and HGV's, the increase in traffic will further impact residents with a greater degree of noise and air pollution, the increase in the pollution and the carbon footprint is contra to West Berkshire Council's policy.</p> <p>We are worried by development plans which we feel cannot be maintained, as infrastructure for travel and impact on the environment have not been assessed.</p> <p>This is an area of Outstanding Natural Beauty and the sheer proportion of developments are no way in keeping with this. These large industrial developments will have a detrimental effect on our landscape and there is a possibility that they could have harmful consequences for wildlife habitats and ancient woodlands that need to be protected. We think that the environmental and ecological ramifications need to have extremely careful consideration so that we do not to lose the rural character of this area.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn NDP Steering Group
Consultee Full Name	Lambourn NDP Steering Group
Consultee Organisation	Lambourn NDP Steering Group
Agent Full Name	
Agent Organisation	
Comment ID	PS444
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 09:28:44
Attached Files	CompressedNov20LC-629_Lambourn_LCA_23_031120ND-compressed.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>This comment is submitted by Lambourn Parish Council and Lambourn Neighbourhood Development Plan: Policy SP21: Sites allocated for Employment Land. Sites ESA2: Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands. Site ESA3: Land to south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands.</p> <p>In its response to REG18, Lambourn Parish Council stated it wished to see EMP5 (now ESA2) removed from the Plan and no further expansion of the area of the DEA. ESA2 is smaller than EMP5, but ESA3 has been added. This not only adds another area to the industrial site but also increases the danger of industrial sites coalescing and changing the landscape character. <i>The Landscape Character Appraisal to Inform the Lambourn Neighbourhood Development Plan (November 2020)</i> identified Membury Airfield as a Landscape Character Area (LCA3) and included recommendations to plan, manage and protect the distinctiveness of LCA3: "The scale and planning of development at this location needs much careful consideration of any further growth to help avoid further change in character."(9.23, p.39) Furthermore,</p>

	<p>increased development of B8 use increases the number of HGVs. These “introduce noise and dust which can lead to synergistic adverse effects on character..... any proposals to increase and expand development at this location should be mindful of such in-combination effects as well as the direct effect of encroachment”. (<i>Ibid</i>)</p> <p>Policy SP2 states that the Council will consider “the impact of cumulative development” within the AONB when determining what constitutes major development. Policy DM35 states: <i>To support the rural economy, proposals for economic development in the countryside will only be permitted where they satisfy the following criteria:.....</i></p> <p><i>h. It would not generate traffic of a type or amount inappropriate for the rural roads, byways or restricted byways affected by the proposal or require improvements to these roads, byways, or restricted byways which could be detrimental to their character and use by motorised and non-motorised traffic.</i></p> <p>Parishioners are concerned that the Plan does not in fact address the cumulative impact of increasing numbers of vehicles, particularly HGVs, using local roads from Junction 14 of the M4 to reach the industrial sites via the B4000, Ermin Street and Ramsbury Road. Walking and cycling along these un-footpathed roads is dangerous, due to the amount of traffic. Residents have to drive to reach local facilities, such as a post box or the Village Hall, in safety. The rural road network in the wider Parish is affected when industrial site traffic seeks to find alternative routes e.g to the A34 or M5.</p> <p>SP21, 7.25: Membury Industrial Estate states: “extending the DEA boundary will aid in addressing a local and rural demand”. At the present time employees travel (or are bussed in) from as far afield as Reading and Swindon. The Plan does not show evidence that demand within the Parish for employment will be met by an expansion of the DEA.</p> <p>The view of LPC/LNDP remains that the Plan does not take into account reasonable alternatives to economic land in West Berkshire, evidence to support the expansion of the Lambourn Woodlands DEAs has not been supplied and the proposed expansion is neither sustainable nor environmentally sound. (Attachment - CompressedNov20LC-629 Lambourn LCA 23 031120ND-compressed.pdf)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Saunderson, Paula
<p>Consultee Full Name</p>	Paula Saunderson
<p>Consultee Organisation</p>	

Agent Full Name	
Agent Organisation	
Comment ID	PS842
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP21 – SITES ALLOCATED FOR EMPLOYMENT LAND</p> <p>As previously referenced. Needs to include the following sites:</p> <ul style="list-style-type: none"> • NEW 1 – LRIE – WBC Lands on the London Road Industrial Estate • GATEWAY PLAZA sites • KENNET CENTRE/ EAGLE QUARTER • SITE FOR A NEW RETAIL PARK as identified on the Policies Map – Greenham <p>Need a MAP OF DEAs & need a MAP for Brownfield Sites to establish which will be Residential, which will be Mixed & which will be solely Employment.</p> <p>SITES ALLOCATED FOR EMPLOYMENT LAND</p> <p>Too many Newbury Sites that are already known are not included and will not benefit from having Specific Policy for what will be significant sites. These include:</p> <ul style="list-style-type: none"> • NEW 1 or WBC Lands on LRIE – London Road Industrial Estate • Gateway Plaza – both Sites - mixed • Kennet Centre/ eagle Quarter- mixed • Mayfield Centre - mixed <p><Comments from representation form></p> <p>None of the Key Mixed Sites for Newbury are included such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, and without these Key Sites and any specific Policy around them.</p> <p>The Plan omits Key Brownfield Sites for Newbury which has favoured the Sandleford Greenfield site. It omits one Key Employment Site for Newbury.</p> <p>Without a Newbury Settlement Sub Area SP Policy there is no clearly articulated Map or Data for this important Major Town.</p> <p>Without clear Maps & Data & Lists for Newbury of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.</p> <p>Therefore, I conclude the Plan is Not Sound for Newbury Settlement and:</p> <ul style="list-style-type: none"> • Is Not Positively Prepared • Is Not Justified • Is Not Effective for the next 20 years, and this Plan as it stands will Not Achieve the Visions <p>My document highlights many examples.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>In Terms of Newbury Settlement it needs to include the following Key Items for the Major Town.</i></p> <p>Include Key Mixed Sites for Newbury such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, Old Magistrates Court and without these Key Sites and any specific Policy around them.</p> <p>Include Brownfield Sites for Newbury to balance against the favoured the Sandleford Greenfield site.</p> <p>Include the missing Key Employment Sites for Newbury.</p> <p>Include a Newbury Settlement Sub Area SP Policy with a clearly articulated Map or Data for this important Major Town.</p> <p>Include Maps & Data & Lists for Newbury of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn Parish Council
Consultee Full Name	Lambourn Parish Council
Consultee Organisation	Lambourn Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1130
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 09:28:00
Attached Files	CompressedNov20LC-629_Lambourn_LCA_23_031120ND-compressed.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This comment is submitted by Lambourn Parish Council and Lambourn Neighbourhood Development Plan: Policy SP21: Sites allocated for Employment Land. Sites ESA2: Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands. Site ESA3: Land to south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands.</p> <p>In its response to REG18, Lambourn Parish Council stated it wished to see EMP5 (now ESA2) removed from the Plan and no further expansion of the area of the DEA. ESA2 is smaller than EMP5, but ESA3 has been added. This not only adds another area to the industrial site but also increases the danger of industrial sites coalescing and changing the landscape character. <i>The Landscape Character Appraisal to Inform the Lambourn Neighbourhood Development Plan (November 2020)</i> identified Membury Airfield as a Landscape Character Area (LCA3) and included recommendations to plan, manage and protect the distinctiveness of LCA3: "The scale and planning of development at this location needs much careful consideration of any further growth to help avoid further change in character." (9.23, p.39) Furthermore, increased development of B8 use increases the number of HGVs. These "introduce noise and dust which can lead to synergistic adverse effects on character..... any proposals to increase and expand development at this location should be mindful of such in-combination effects as well as the direct effect of encroachment". (<i>Ibid</i>)</p> <p>Policy SP2 states that the Council will consider "the impact of cumulative development" within the AONB when determining what constitutes major development. Policy DM35 states: <i>To support the rural economy, proposals for economic development in the countryside will only be permitted where they satisfy the following criteria:.....</i></p> <p><i>h. It would not generate traffic of a type or amount inappropriate for the rural roads, byways or restricted byways affected by the proposal or require improvements to these roads, byways, or restricted byways which could be detrimental to their character and use by motorised and non-motorised traffic.</i></p> <p>Parishioners are concerned that the Plan does not in fact address the cumulative impact of increasing numbers of vehicles, particularly HGVs, using local roads from Junction 14 of the M4 to reach the industrial sites via the B4000, Ermin Street and Ramsbury Road. Walking and cycling along these un-footpathed roads is dangerous, due to the amount of traffic. Residents have to drive to reach local facilities, such as a post box or the Village Hall, in safety. The rural road network in the wider Parish is affected when industrial site traffic seeks to find alternative routes e.g to the A34 or M5.</p> <p>SP21, 7.25: Membury Industrial Estate states: "extending the DEA boundary will aid in addressing a local and rural demand". At the present time employees travel (or are bussed in) from as far afield as Reading and Swindon. The Plan does not show evidence that demand within the Parish for employment will be met by an expansion of the DEA.</p> <p>The view of LPC/LNDP remains that the Plan does not take into account reasonable alternatives to economic land in West Berkshire, evidence to support the expansion of the Lambourn Woodlands DEAs has not been supplied and the proposed expansion is neither sustainable nor environmentally sound. (<i>Attachment - CompressedNov20LC-629 Lambourn LCA 23 031120ND-compressed.pdf</i>)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Copas Farms (Represented by Barton Willmore)
Consultee Full Name	Copas Farms
Consultee Organisation	Copas Farms
Agent Full Name	Mr Mark Owen
Agent Organisation	Barton Willmore
Comment ID	PS1148
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 16:19:00
Attached Files	Barton Willmore (Copas Farms) Full Rep.pdf PS1148 Barton Willmore (Copas Farms) Plan 1.pdf Barton Willmore (Copas Farms) Plan 2.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p><i>[See attachment 'Barton Willmore (Copas Farms) Full Rep' for full Local Plan Review representation]</i></p> <p>Proposed Allocations and Constraints</p> <p>Six employment land allocations are identified in emerging policy SP21. Accordingly, regarding the shortfall, the Local Plan Review document in paragraph 7.9 states that <i>“as with the office requirement, the Council has positively sought opportunities to meet the industrial requirement however, the district is heavily constrained, and this has resulted in a lack of suitable available sites”</i>.</p> <p>Returning to national policy briefly, the NPPF is clear in paragraph 11 that strategic policies should seek to meet anticipated needs over the plan period, unless:</p> <p>i) The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan area; or</p> <p>ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assess against the policies in this Framework taken as a whole.</p> <p>In West Berkshire this is to a large extent related to the North Wessex Downs Area of Outstanding Natural Beauty ('AONB') which under paragraph 11 (d) (i), footnote 7, of the NPPF is defined as a protected area. However, having regard to the allocations with the Submission version of the Local Plan Review, four of these sites are indeed within the AONB (ESA2, ESA3, ESA4, ESA5), two of which are located at the Beenham Industrial Area.</p> <p>Section 5.4.2 of the SA/SEA Environmental Report November 2022 considers the potential reasonable alternatives for allocation for employment uses. Critically, in Table 55, it states for Part BEEN3 & Part of BEEN5 (ESA4), BEEN10 (ESA5), LAM6 (ESA2), and LAM 10 (ESA3) that <i>“there is an overriding need for additional employment for industrial uses within the district and therefore, exceptional circumstances (NPPF Para 177) can be demonstrated regarding the allocation of the site within the AONB.”</i></p> <p>Consequently, it is unclear why further sustainable sites, such as our client’s site of land adjacent to Beenham Industrial Area, have not been included in the Plan’s proposed allocations, as we discuss in further detail below.</p> <p>Soundness of Emerging Policies SP20 and SP21</p> <p>Considering the above, we therefore have concerns with the soundness of emerging policies SP20 and SP21 as set out below.</p> <p><u>Positively Prepared:</u> Emerging policies SP20 and SP21 have not been positively prepared as they do not seek to meet the identified employment needs, as set out within the ELRA, and therefore do not support achieving sustainable development in West Berkshire.</p> <p><u>Justified:</u> The strategy in emerging policies SP20 and SP21 does not take an appropriate strategy as it is not seeking to identify sufficient sites to meet the identified need. The reasons for doing so are not justified when considering the identified need and available sites that can contribute to this need, including our client’s site.</p>

Effective: Emerging policies SP20 and SP21 will not deliver enough development to meet the identified need over the plan-period. Moreover, references to additional sites (i.e. LRIE) that are not allocated should not be included as they cannot contribute to meeting need.

Consistent with National Policy: Emerging policies SP20 and SP21 are not consistent with seeking to meet the identified need and delivering the economic objective of achieving sustainable development.

As shown on the supporting Location Plan [see attachment 'PS1148 Barton Willmore (Copas Farms) Plan 1'], our client controls land directly adjacent to the Beenham Industrial Area ('the Site'). The Beenham Industrial Area, which also contains land within our client's ownership, is identified by Policy DM32 'Designated Employment Areas' (and listed in Appendix 4 table 18) as one of the specific locations within the District area designated for business uses. Beenham Industrial Area (previously known as a 'Protected Employment Area') was designated through the West Berkshire District Local Plan 1991 - 2006 highlighting its longstanding record as an employment area.

Our client is promoting the Site through the Local Plan process for approximately 20,000 sqm of a mix of employment uses (Class E, B2 and B8) (This is a lower quantity of floorspace than promoted previously in light of the potential inclusion of landscape buffers, as illustrated on the attached 'concept' plan [see attachment "PS1148 Barton Willmore (Copas Farms) Plan 2']"). The Site is not proposed to be allocated within the proposed submission version, however, due to the circumstances outlined below and set out within our representations, in our client's opinion the Site should be identified as an additional allocation with the Local Plan.

- The Site will contribute to meeting the identified shortfall in employment land allocated through the Local Plan;
- The Site is sustainably located adjacent to the existing Beenham Industrial Area, including other sites proposed for allocation; ESA4 and ESA5;
- The Site has good sustainable connectivity connections to the A4, local bus routes (Jetblack 1), and Aldermaston Wharf rail station; and
- The Site has an opportunity to incorporate mitigation measures, including vegetation screening, to avoid any landscape and visual impact on the North Wessex Downs AONB.

For the reasons set out below, our client considers that land adjacent to Beenham Industrial Area should be included as an allocated employment site to assist the Council in meeting its employment needs:

- The Site will support delivery of the minimum employment needs identified by the ELRA through the additional provision of approx. 20,000 sqm of Class E, B2 and B8 uses within the plan period. This has been decreased from the quantity submitted previously in light of the inclusion of potential landscape buffers. This includes supporting the existing weak pipeline supply of office space and the acute shortage in available industrial units as stated in paragraphs 7.11 and 4.91 of the ELRA respectively. In particular, the Site provides an important opportunity for creating space for smaller units which are in short supply in West Berkshire across both employment types (see paragraphs 7.11 and 4.91 of the ELRA). Furthermore, whilst the Council intends to commit to revisiting the employment land supply as part of the five-year review, due to the nature of the constraints facing West Berkshire, it is unlikely that a significant amount of 'new' land will become available, and therefore sufficient supply should be identified now, such as our client's site, to ensure the Council's employment needs strategy is sound.
- The Site is located in a sustainable location adjacent to the existing Beenham Industrial Area which is proposed to be a Designated Employment Area ('DEA') and could therefore form a logical extension to the DEA. The Site can also be sustainably accessed off Grange Lane, via the A4 which provides a direct route to the large conurbations of Reading and Newbury, in addition to the M4 (Junction 12 is only approximately 4.5 miles from the Site). The A4 route also connects the Site to the Eastern Spatial Area which is proposed to continue to be important for business development as per Policy SP1 – the Spatial Strategy. Regarding other transport modes, bus stops are located within 250 metres of the Site along the A4 whereby the Jetblack 1 bus route connects Newbury to Reading via Thatcham, Woolhampton, and Theale via a twice hourly service. The Site is also less than 500 metres from Aldermaston Rail Station whereby trains run hourly providing access to Reading and As is demonstrated by the two proposed allocations at the Industrial Area (ESA4 and ESA5), the Site is evidently an appropriate location for this form of development.
- The Site is consistent with paragraph 85 of the NPPF which states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. As the Site is located within the North Wessex Downs AONB spatial area and outside of a defined settlement boundary, paragraph is relevant for our clients Site. Albeit the Site is sustainability connected to the highway network as referred to above and located adjacent to a proposed Designated Employment Area.
- Whilst the Site is located within the AONB, it is considered that sensitive mitigation measures, including generous vegetation screening within the Site could be used to limit any perceived landscape and visual impact on the AONB. A high-level concept plan is attached to this representation demonstrating how this could be achieved. As previously referred to, ESA4 and ESA5 are proposed allocations at the industrial area within the AONB providing landscape buffers and landscape enhancements to reduce their perceived impact. The Landscape Character and Sensitivity Assessments (June 2022) for our clients Site (BEEN 11 Parcel 1 and 2) suggest that there is potential to enhance the woodland character of the area (as is proposed for ESA4 and ESA5) which would also block views into the AONB and across the area to the Kennet Valley side. In our client's opinion, the Site is already well contained, particularly as a result of existing vegetation, including woodland and hedgerows along Clay Lane, and recent further tree planting by our client, limiting views beyond the Site into the AONB. On behalf of our client, we therefore contest the conclusions of the Landscape Character and Sensitivity Assessments

	<p>and consider that sensitive mitigation measures could feasibly reduce any perceived landscape and visual impacts of development at this Site.</p> <p>On the basis of the above we consider that land adjacent to Beenham Industrial Area should be included as an allocation under emerging policy SP21 to assist in reducing the shortfall in identified industrial and office space within the District as set out within the supporting evidence base to the Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>Additions are shown underlined, deletions by strikethrough</p> <p>Policy SP21: Site Allocated for Employment Land</p> <p>The following sites will be allocated to facilitate the growth and forecasted change of industrial land and contribute to meeting the identified office land need over the plan period.</p> <p><i>[see attachment 'Barton Willmore (Copas Farms) Full Rep' for Table 4]</i></p> <p>A specific policy (ESA7) should subsequently be included, and relevant reference made through the Local Plan where necessary.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	To expand on points made within this representation
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Panattoni (Represented by Turley Associates)
Consultee Full Name	Mr Tony Watkins
Consultee Organisation	Panattoni
Agent Full Name	Taylor Cherrett
Agent Organisation	Turley Associates
Comment ID	PS1237
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
<p>Submission Type * E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 08:32:00
Attached Files	PS1237 Turley (Panattoni) Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	We do not believe the plan is legally compliant in relation to its assessment of employment provision within the Sustainability Appraisal.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Introduction</p> <p>These representations have been prepared by Turley on behalf of Panattoni in response to the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023). Our client has important land interests in the Local Plan area, in particular land to the north of the A4, to the east of Theale. A copy of the Site Location Plan is provided at Appendix 1.</p> <p>These representations have been based upon the contents of the latest consultation document and its evidence base but also have had regard to all previous representations made by Panattoni to West Berkshire Council (WBC).</p> <p>Representations were submitted to the December 2020 Emerging Draft consultation. At that time the site was a draft allocation (Policy EMP6). It has since been removed in the Proposed Submission version of the Plan on the basis of landscape impact concerns raised by the Council's landscape consultant.</p> <p>The site is considered in the West Berkshire Housing and Economic Land Availability Assessment January 2023 under reference THE8.</p>

The structure of these representations is as follows:

- Context;
 - Comments on Regulation 19 Local Plan;
 - A review of land at Hoard Way, Theale in line with paragraph 67 of the NPPF;
- and
- Summary & Conclusions.

At present Panattoni object to the draft Local Plan on the basis it has an identified shortfall in the employment requirement despite suitable sites such as land at Hoard Way, Theale being suitable and available for employment development. These representations set out Panattoni's case in this regard.

Context

The National Planning Policy Framework (NPPF)

The NPPF provides the Government's overarching policy for planning.

The NPPF requires that the planning system should be genuinely plan-led. Local plans are subjected to examination in order to assess whether they are legally compliant (for example with respect to the Duty to Cooperate and Sustainability Appraisal) and sound.

Paragraph 35 of the NPPF sets out that:

"Plans are sound if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."

It is within the context of paragraph 35 of the Framework that these representations have been prepared.

A updated NPPF is currently the subject of consultation until March 2023. Transitional arrangements are set out within the consultation document at paragraph 225 noting that:

"For the purposes of the tests of soundness in paragraph 35 and the policy on renewable and low carbon energy and heat in plans in paragraph 156, these policies apply only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage, or that reach this stage within three months, of the publication of this version"

As a result, the West Berkshire Local Plan will be assessed against the provisions of the July 2021 NPPF and assessed against the tests of soundness set out above.

Policy SP21: Sites Allocated for Employment Land

Policy SP21 'Sites allocated for Employment Land' allocates six sites totalling approximately 68,781sqm of B2/B8/Egiii land.

The supporting text for the policy states the Council will seek to ensure that sufficient sites are provided in the right locations to foster sustainable economic growth. It also states that the allocated sites are focused around or near to areas of existing employment activity.

As a result of the need identified above we object to Policy SP21, as it does not identify sufficient sites to meet the employment requirement.

We consider further sites should be allocated for employment uses such as land at Hoard Way, Theale.

Land at Hoard Way, Theale - Proposed Employment Site

This part of the representations sets out an overview of Panattoni's land interest at land at Theale and the reasons why it should be allocated for employment use to help meet the need identified in the plan and its evidence base.

We consider the merits of the site below, in line with paragraph 67 of the NPPF, which underlines that local planning authorities should establish realistic assumptions about the availability, suitability and the likely economic viability of land across the District.

The Site and Surroundings

The site extends to an approximate area of 5.4ha comprising a vacant field broadly rectangular in shape with no built form or public access between the M4/Bath Road and the existing settlement of Theale (see the Site Location Plan at Appendix 1).

Power cables cross over the site and there is a pylon within the site itself.

The site is directly south-west of Junction 12 of the M4 providing strong strategic transport links. Bath Road provides access between Newbury and Reading.

The site abuts High Street to the north with a number of residential properties abutting the north-west corner of the site. Vehicular access along the High Street to the north of the site is limited by barriers, but cycle/ pedestrian access remains. This route leads to a footbridge across the M4 to Pincents Lane, Calcot.

The M4 is contiguous with the north-eastern boundary of the site save for a small inset on the northern corner which is associated with the existing Telecommunication Mast. The south-eastern corner rejoins the J12 slip road onto the M4. The A4 Bath Road that runs along the southern boundary of the site. These boundaries are screened by existing landscaping including established trees.

The western boundary aligns with Hoad Way connecting the A4 to Theale High Street. Adjacent uses comprise predominately road infrastructure (east, south and west) with a number of residential properties abutting the north-western boundary.

Within the immediate context of the site, Arlington Business Park and Theale Business Park lies to the south of the Bath Road, east and west of Waterside Drive. Arlington consists of mainly office buildings within a landscaped setting, whilst Theale Business Park comprises predominantly warehouse development with limited landscaping and increased focus on loading bays and parking associated with the distribution uses.

To the west of the site is James Butcher Drive where there are existing residential apartments accessed from Hoad Way. There is a tree belt along this boundary with well-established trees. Further west lies the centre of Theale with a range of residential, retail and commercial properties. To the north of the site there is a residential estate abutting an undeveloped field further east.

With regard to accessibility, the closest bus stops to the site are located on the High Street in Theale within 150m of the site. There are two main bus services that provide access between Reading Town Centre, Calcot, Thatcham and Newbury and run half hourly every day. The closest railway station is approximately 900m to the south-west of the site and offers services between Newbury, Reading and London Paddington.

This site is strategically located for employment led development and well positioned with the existing highways network.

The site lies partially within the Theale High Street Conservation Area and falls within Flood Zone 1 and 2. The site also falls within the AWE Outer Zone. The site is outside the existing settlement boundary of Theale which currently extends to the rear of the properties abutting the northern boundary and along the western edge of Hoad Way.

The Lower Pang Valley and Sulham Stream Biodiversity Area is located to the north of the site, on the other side of High Street. The AONB boundary is positioned to the northeast of the site and extends across the M4 to the east. It is noteworthy that the boundary of the AONB was established prior to the M4 being constructed.

The site has been subject to planning applications for employment uses:

- Application reference 20/00476 sought planning permission for 20,000sqm of commercial floorspace B1(c), B2 and B8. This was withdrawn in order to address comments received on the scheme.
- Application reference 21/02029/COMIND sought planning permission for three employment units for flexible uses within Class E (light industrial), B2 and B8.

This was withdrawn in order to address comments received on the scheme.

HELAA site assessment

The site was proposed as an emerging employment allocation (Land north of Arlington Business Park, Theale East Business Centre, Policy EMP6) in the 2020 Regulation 18 version of the Local Plan. The site was proposed to be allocated for 20,000sqm of employment floorspace.

In the Proposed Submission version, the site has been omitted as a proposed allocation. The Employment Background Paper (2023) states the reason as "removed from the LPR following landscape assessment".

The site is considered in the West Berkshire Housing and Economic Land Availability Assessment January 2023 under reference THE8. The conclusion of the suitability section notes that:

"Suitability conclusions: A Landscape Sensitivity and Capacity Assessment has concluded that if the site was developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It is therefore recommended the site is not developed for employment uses."

Suitability Assessment: Unsuitable

Availability Assessment: Available

Achievability Assessment: Not assessed due to site being unsuitable"

Turley Landscape has undertaken a landscape and visual assessment (LVA) of the site and has reviewed the WBC assessment. This information was submitted, at the Council's request, to the Head of Planning Policy and Interim Head of Planning on 11th May 2022. Unfortunately, there is no reference with the Plan or the evidence base that the information has been considered in the formation of the Publication version of the Local Plan. For ease the information is submitted at Appendix 2.

It is Panattoni's position that both the Visual and Landscape Sensitivity of the site have been overstated and that the Landscape Capacity of the site is much greater than posited by the Council. The LVA sets out that the site is of Medium Visual Sensitivity, Medium/Low Landscape Sensitivity and has a Medium/High Landscape Capacity to accommodate future employment development.

Whilst the introduction of employment development on this site would result in harm to the character and appearance of the Site itself (as any employment development of green field sites would), the strong enclosure of the Site by existing roads, development and vegetation, the weak association of the site with the wider

countryside and the association with other employment sites in the local context would mean that, (subject to an appropriate design and landscape strategy) development could be accommodated with few adverse landscape or visual effects beyond the Site itself.

As a consequence, the LVA considers that the site is an appropriate site for future employment development.

The following design principles would allow for employment development on the Site whilst minimising potential landscape and visual impacts:

- Focus principal development areas in the central and western parts of the site to maintain the separate identities of Theale and Calcot

- Create a strong landscape belt along northern edge of the site to form a green corridor, provide screening of the northern edge of development and form an enhanced edge to the adjacent footpath route between Theale and the AONB;
- Retain existing perimeter hedgerow and planting belts and reinforce with additional planting;
- Integrate tree planting within and around development areas to provide screening and visual enclosure to the site, increase local biodiversity and soften the appearance of proposed buildings;
- Incorporate pedestrian and cycle routes within site layout and connect with existing network of routes in the local area;
- Soften and screen car parking and goods yard areas with tree and hedgerow planting.

The submitted proposals have incorporated the recommendations.

The site comprises an area of rough grassland adjacent to the settlement edge of Theale. Existing employment and commercial land uses are located to the south and north-east of the site and the settlement of Theale lies to the west. The site is cut off from the wider countryside (including the AONB landscape to the north and northeast) by these areas of development and by the network of roads which encloses the site on all four sides. The site currently forms an open area of undeveloped land on the edge of the settlement and has no demonstrable attributes which elevate it above the ordinary in landscape or visual terms.

It is also important to note that the Council have also proposed residential uses in the emerging Regulation 19 Local Plan on the other side of the High Street. They have been assessed through the plan-making process including landscape terms and found acceptable. It is plain that the Council consider development in the vicinity of the site is acceptable.

The removal of the Site as a proposed employment allocation was unfounded and has compounded issues in relation to employment need within the Borough.

The Opportunity

Since the most recent application (21/02029/COMIND) was withdrawn in January 2022 the proposal has been re-visited. The revised proposals have been submitted under preapplication request 22/03049/PREOPD and are currently under consideration. The scheme seeks to address the comments received from Planning and Technical Officers during the course of that application, particularly in response to concerns over the landscape sensitivity of the site.

This has resulted in a scheme which increases the landscape buffers around the edges of the site and sets back the site creating more of a landscape setting for the site. The buildings have been further set back from High Street reducing their visibility from the Theale Conservation Area.

The landscape strategy for the site looks to create a strong landscape buffer that softens the interface between the site and the adjacent village of Theale. These buffers will be utilised for the creation of a mosaic of habitats while also reinforcing the existing boundary vegetation. Internally, the landscape design will seek to create an attractive formal business park feel through the use of hedgerow, larger stature trees, close mown grass verges and ornamental planting with breakout space created for the benefit of employees and visitors to the site.

The masterplans are provided as Appendix 3 to these representations.

Site Suitability

Flood Risk and Drainage

In support of planning application 21/02029/COMIND a Flood Risk Assessment was prepared by BWB. The assessment demonstrated that the site lies within Flood Zone 2 and that modelling undertaken in the FRA with proposed mitigation embedded into the design of a scheme demonstrates that the site will lie in Flood Zone 1 post-development. SuDs features can be designed into the scheme, likely to be maintained by a management company in perpetuity.

Flood risk and drainage is not considered to represent a constraint to development of the site.

Ecology

A Preliminary Ecological Appraisal and a Preliminary Bat Roost Assessment was prepared by Middlemarch in support of application 21/02029/COMIND. This has been supplemented by a Walkover Survey to ensure the findings remain relevant.

Based on the finding of the ecological appraisals the site, ecology is not considered to represent a constraint to development.

Archaeology

A desk-based archaeological report was prepared by TVAS in support of application 21/02029/COMIND.

This demonstrated that the proposals are acceptable subject to the completion of a scheme of evaluation which can be dealt with through a future planning application and via a suitably worded planning condition.

Ground Conditions and Contamination

A Phase 1 and 2 Geo-environmental Assessment was prepared by BWB in support of planning application 21/02029/COMIND. This includes boreholes, puts and two preliminary rounds of ground gas monitoring.

The investigations confirmed that there was no visual or olfactory evidence of contamination with no identified contaminants above the health screening levels at the site. Ground gas protecting measures are not indicated to be required at the site.

Minerals

A Sand and Gravel Recovery Report was prepared by BWB, alongside the above Phase 1 and 2 survey, in support of planning application 21/02029/COMIND.

The report finds that deposits of sand and gravel exist at the site, however the deposit is likely to be economically and environmentally unviable due to:

- Limited suitable/ easily accessible resource thickness;
- High groundwater levels and saturation of the gravel deposit;
- Dewatering and stability issues, including associated costs; and
- Vehicular movements and resultant environmental impact.

On the above basis, it is considered that the deposit would be of little commercial interest in line with the Replacement Minerals Local Plan (RMLP) Saved Policy 2.

Noise

A Noise Assessment was prepared by Tetrattech in support of application 21/02029/COMIND.

It concluded that "Given the favourable results of the assessment described above and the inclusion of intrinsic mitigation as described within this assessment, no nearby businesses are expected to have unreasonable restrictions put on them as a result of the proposals. In addition, it is considered that the continued commercial/industrial use of the site will not have an adverse effect on the tranquillity of the areas and local access to areas of greater tranquillity."

Noise is therefore not a constraint to development of the site. The employment use of the site is not sensitive to the proximity of the M4.

Transport

A Transport Assessment was prepared by David Tucker Associates in support of planning application 21/02029/COMIND, following pre-application discussions with West Berkshire Highways and Highways England.

It confirmed that suitable vehicular access can be achieved onto Hoad Way, with the required visibility splays achieved.

The Transport Assessment finds that the percentage increase on any single movement will be a maximum of 5% during peak periods. This level of traffic is well within daily variation of background flow.

Assessments have been undertaken of the principle junctions around the site including the M4, which confirm they are well within their theoretical capacity.

The site is sustainably located. It is located within 150m of existing bus stops that provide half hourly services between Reading and Newbury. In addition, Theale Station is within 900m of the site with services between Newbury and London Paddington. The site is within walking distance of Theale High Street that provides a range of local services, as well as being within walking distance of residential development within Theale or Calcot to the east.

Parking and cycle parking can be provided in accordance with the relevant standards.

The proposed development will not result in an unacceptable impact on highway safety, and transport impact is therefore not considered a constraint to the allocation of the site for employment uses.

Air Quality

An Air Quality Assessment was prepared by Tetra Tech to support planning application 21/02029/COMIND.

The Assessment established that during the construction phase, site specific mitigation measures detailed within the assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.

During the operational phase, detailed dispersion modelling of traffic pollutants has been undertaken for the proposed development. The long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO₂) is determined to be 'negligible'. With respect to PM₁₀ and PM_{2.5} exposure, the effect is determined to be 'negligible' at all identified existing sensitive receptor locations. The effect at ecological receptors is not predicted to be significant.

Summary of Site Suitability

As demonstrated above the site is wholly suitable, with no technical constraints which would impede its delivery.

Site Availability

Panattoni is Europe's largest industrial and logistics developer with a track record of delivering over 320 million sq ft of commercial floorspace globally.

Panattoni has extensive experience of delivering high quality commercial facilities including warehouses, distribution centres and logistics parks throughout the UK, as well as across Europe.

As a result they have a substantial track record in the delivery of commercial development and can mobilise quickly. The site is available immediately and the site is deliverable in the short term.

Panattoni are engaging in pre-application discussion, with an application being prepared to be submitted imminently.

The site is available and can be delivered early in the plan period to support the employment need within the WBC.

Conclusions on Land at Hoad Way, Theale

The Site is located to the east of Theale which is a Rural Service Centre for the purposes of the adopted Core Strategy and is within an area of West Berks that has strong functional relationships with Reading, reflected within the Council's emerging Local Plan and the conclusions of the West Berkshire EDNA.

The site is located within 150 metres of Theale High Street and 900m from Theale train station (serving the mainline London

to the West Country route). The site provides opportunities for local residents to gain employment within an accessible and sustainable location.

The Site is within 500m of Junction 12 of the M4 and will provide a new employment development that provides easy access to the strategic road network offering convenient access to Heathrow, London,

the West and the Midlands. This aligns with the priorities of the Thames Valley LIS in locating employment development close to motorway junctions.

This is one of the only sites within West Berkshire within such proximity to a motorway junction which is not constrained by the North Wessex Downs AONB. It should, therefore, be considered as a highly desirable location to meet the Council's employment needs and preferable to other sites within similar proximity to Junctions 13 and 14 of the M4.

The above position was recognised by West Berkshire Council through its Regulation 18 Local Plan which identified the site as a proposed allocation for employment land through emerging Policy EMP6 (Land north of Arlington Business Park, Theale East Business Centre).

The proposals will assist towards addressing the existing shortfall in industrial floorspace within not only West Berkshire but the wider Thames Valley. The proposals provide an opportunity to attract future occupiers to the District providing a range of unit sizes to support smaller to larger space requirements delivering additional business rates and employment opportunities for the District.

The draft Plan recognises that Theale will be a focus for additional housing through existing commitments and new allocations. Housing growth should be supported by economic growth, to enable residents to live close to where they work, promoting sustainable development and growth, reducing travelling. Land north of the Site is a proposed residential allocation in the draft Plan (Whitehart Meadow, Theale and Former Theale Sewage Works for 100 units and 70 units respectively).

The landscape comments in the 2023 HELAA are disputed. The site has limited landscape value due to its location adjacent the M4. The adopted residential site allocation on the east side of the M4 for 200 units is under construction, which itself is bounded to the north by employment and retail uses which bounds the M4. The site can be considered infill development

The site will contribute to the unmet employment need identified in the draft Plan and is suitably located to deliver a range of employment uses reflective of the needs identified in the employment background papers.

Summary and Conclusion

These representations have been prepared by Turley on behalf of Panattoni in respect of the West Berkshire Local Plan Review 2040 Proposed Submission (Regulation 19) Consultation (January 2023). As set out in these representations the draft Local Plan does not meet the tests of soundness as set out by paragraph 35 of the NPPF and requires modifications. Specifically, the draft Local Plan has not identified sufficient sites to meet the identified need as set out within its supporting evidence base. Additional employment sites, such as land at Hoad Way, Theale is required to be allocated before the Plan can be found sound.

We reiterate that Theale is a key rural service area in the district that is able to support employment growth to support the district's unmet employment needs, supporting the proposed residential allocations north of the site, and contribute to maintaining a thriving rural area.

Land at Hoad Way, Theale is a sustainable and deliverable site that is under single ownership. Panattoni considers there are opportunities for the site to come forward early in the Plan period to meet an identified employment need.

There are no identified technical barriers to development, as identified through the technical studies summarised in these representations and submitted in support of the previous planning applications. Panattoni look forward to working with the Council throughout the Local Plan process.

Attachments: Appendices (Appendix 1 - Site Location Plan, Appendix 2 - Turley Landscape and Visual Impact Appraisal, Appendix 3 - Masterplans(s))

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed employment allocation and that the LPR does not provide enough sites to provide sufficient employment land.</p> <p>We can assist the inspector in their consideration of the Local Plan and associated evidence.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	<p>Yes</p>

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pittard, Matthew (Represented by Pro Vision)
Consultee Full Name	Mr & Mrs Mathew Pittard
Consultee Organisation	
Agent Full Name	Mr James Blake
Agent Organisation	Pro Vision
Comment ID	PS1709
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:19:00
Attached Files	Pro Vision - Mr & Mrs Pittard
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>This policy seeks to allocate 20,400sqm of B2/B8 floorspace over the plan period in Thatcham, specifically on 'Land east of Colthrop Industrial Estate' (Policy ref. ESA1). Paragraph 7.24 explain that this is a 'logical extension and would aid in meeting the identified need in the Urban Area of Thatcham.</p> <p>However, we consider that by focusing all the B2/B8 floorspace over the plan period in one area, this does not allow opportunities for other sites to come forwards which would be able to offer economic benefits to Thatcham and the wider urban area of Newbury and potentially risks stifling the choice and availability of B2/B8 premises.</p> <p><i>Summary</i> The evidence base demonstrates there is demand for small and medium sized sites for employment in the District. The Council's approach to only focus development economic and business development in specific areas of the District appears short-sighted, given there is an identified need and demand for a significant amount of industrial development.</p> <p>In summary, the LPR should be allocating more sites for economic and business development over the plan period that are consistent with the broad spatial strategy, noting that there are many available sites within the HELAA which have been overlooked, including our client's site 'Land at Lower Way Farm' (HELAA ref: THA9).</p> <p>Land at Lower Way Farm, Thatcham</p> <p>5.1 In the context of the concerns raised about the vulnerability of the emerging development strategy and the obvious solution of identifying a greater yield of new homes from the sites available in the HELAA, we now discuss our client's land, which has been overlooked as a sustainable and available site for development.</p> <p>Representations were most recently submitted to the Council on 4 February 2021 in response to the West Berkshire Council Local Plan Review 2020-2037: Emerging Draft Consultation (December 2020) and in support of the land owned by our clients at Lower Way Farm, Thatcham (HELAA ref THA9). The representations set out, in detail, the suitability of the site for development.</p> <p>Following the consideration of the site in the updated HELAA (January 2023) this concluded the site is available, achievable and 'potentially developable in part', dependent on further assessment over whether circumstances exist to support the change to the settlement boundary.</p> <p>In summary, we confirm the site remains suitably located to the south of Thatcham and offers the potential for a sustainable and logical residential development of around 36 dwelling, alongside open space and planting for ecological enhancement.</p> <p>Alternatively, the site also offers the potential for a sustainable and logically located commercial development, which could build on the success of the nearby Riverside Studios employment site.</p> <p>Both options would be in line with the Council's strategy for growth and the settlement hierarchy, as outlined in Policy SP3.</p> <p>The TSG (Stage 2) Strategic Growth Study at paragraph 5.12 states that "small sites such as... Lower Way Farm... should be excluded... as they are not of sufficient scale to deliver a strategic allocation. This does not mean they are unsuitable for development, simply that they fall outside of the scope of this study".</p> <p>We do not agree with this conclusion and this conflicts with NPPF paragraph 69 which highlights the importance of small and medium sized sites in making important contributions to the housing requirement of an area. Further, there are various merits in favour of the site's development. We consider there are compelling reasons for the settlement boundary to be redrawn and the site allocated in the LPR for, preferably residential development. Whilst not exhaustive, the following reasons provide certainty as to why the site is a developable option:</p> <ul style="list-style-type: none"> • There is an identified need for a range of different sized sizes for housing in West Berkshire to meet the indicative housing requirements during the plan period. Due to its modest scale, the site

could be built out quickly in accordance with paragraph 69 of the NPPF and provide for affordable housing.

- The site is immediately adjacent to the built-up area of Thatcham, which is capable of accommodating significant levels of growth, given the range of facilities and services it currently offers and is therefore a sustainable location for development.
- The site has a good relationship with existing residential development to the north and would fit well into the existing pattern of the settlement, providing an appropriate mix of housing type and tenure.
- There are opportunities to create high quality green infrastructure which would present an attractive and distinctive setting to development.
- The site is close to local services and facilities with opportunities for walking, cycling and the use of public transport, which could positively effect sustainability.
- The site is within a Biodiversity Opportunity Area which presents an opportunity to include biodiversity enhancements and net gain for the development. The site is not subject to any other specific environmental or statutory designations, such as Green Belt, Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI) and is outside of the DEPZ emergency zone.
- The area of the site put forwards for development would be within Flood Zone 1 and at 'very low risk' from surface water flooding (footnote 4).

Availability of THA9

The site is considered to be available for residential or commercial development immediately. Our client's own the land outright, which is in single ownership and there are no legal issues which would prevent the timely delivery of the site for development.

Achievability of TH9

The site is considered to be 'achievable' for the reasons set out below:

- A vehicle access can be delivered via the existing access to Lower Way Farm, onto Lower Way.
- The site is vacant agricultural land – therefore, it is likely there are no significant constraints (such as contamination) which would preclude the development of the site on viability grounds.
- Our client's wish to only work with a reputable developer who is able to demonstrate a good track record for delivery.

In summary, there are no insurmountable constraints to prevent the delivery of 'Land at Lower Way Farm, Thatcham' (HELAA ref: THA9). The site is suitable, available and achievable for residential or commercial development now, which can help the Council to meet its identified housing and employment needs in a timely and sustainable manner. Accordingly, we consider the Council should review its delivery strategy and allocate our client's site for development in the LPR.

Alternatively, the site could be accommodated within a revised settlement boundary, given its modest scale. It is considered that the development of this site would relate well to the existing settlement pattern and urban/mixed use nature of the area and would clearly make a greater contribution to the built form of this area, rather than the wider countryside. Such amendments to settlement boundaries through the LPR provides an opportunity to proactively deliver small and medium-scale sites which will help to boost supply and help meet the Council's housing and employment needs targets across the plan period.

In relation to Riverside Studios (HELAA ref. THA24) the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) (November 2022) concludes that development of the site would result in an overall neutral impact, with a positive impact on economic sustainability as the site is promoted for redevelopment of an existing employment area. No negative sustainability impacts have been identified. However, the site is not recommended for allocation as it is an existing employment use for small scale independent businesses and its allocation would not be consistent with the strategy for employment allocations set out in the LPR.

Again, we do not agree with this conclusion, given this is a successful employment site and the absence of any constraints. We consider there are compelling reasons for the site to be allocated for employment, in addition to the allocations proposed in the draft Local Plan Review and suggest the spatial area settlement boundary should be extended to include this site, with an allocation made to incorporate it.

Conclusion

Accordingly, we are of the view that's the Council should consider 'Land at Lower Way Farm, Thatcham' for allocation in the LPR. We have demonstrated the site is developable, suitable, available and achievable now. Therefore, we consider the Council has been premature in overlooking this opportunity.

The site's allocation would, in principle, be consistent with the settlement hierarchy.

Alternatively, there is also an opportunity to simply amend the settlement boundary for Thatcham as part of the Council's review to provide additional opportunities for growth to help meet the Council's housing and employment needs over the plan period.

Similarly, from an economic perspective, our client's site is ideally located to help accommodate the some of the economic needs of the District and would be able to build on the success of 'Riverside Studios' (HELAA ref. THA24) as an employment site, enabling small and medium sized businesses an opportunity to start and grow in Thatcham. Our clients own the commercial premises to the south and west of the site, known as 'Lower Way Farm Riverside Studios', which is a successful established local employment premises. As such, we consider this should be reflected in its allocation in the Local Plan Review as a site for economic development. This will safeguard the modest level of employment opportunities that the site provides.

At this stage, we consider the LPR to be unsound, but have provided our recommendations to ensure the plan is made to be more robust. We therefore trust these representations clearly set out our client's

	<p>position and respectfully request the above is given due consideration by the Council as part of the examination into the West Berkshire Local Plan Review.</p> <p>Attachment:</p> <p>Full rep (inc. appendix A - site location plan, appendix B- Indicative Site Plan, Appendix C - Local Facilities and Services Plan, Appendix D - Physical and Environmental Context Plan)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	To ensure that the views of our client in respect of 'Land at Lower Way Farm, Thatcham' and the shortcomings identified in the Local Plan Review and its evidence base relation to the allocation of sites and land for housing and economic delivery are heard
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pearce, Alan
Consultee Full Name	Alan Pearce
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1030
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 09:34:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	I'm not qualified to answer.
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	The reason I have put no is because large sites which we know will be developed are not included in the plan. Eg London Road Industrial Estate, Gateway plaza, Kennet centre/Eagle quarter.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	To make this plan sound it needs to include these large sites, like the London Road Industrial Estate, Gateway plaza, Kennet centre/Eagle quarter.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes

5. Independent Examination	Because the London Road industrial Estate has been at a standstill for many years now, and it needs a development plan policy to guide its regeneration to take it forward with a master plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wokingham Borough Council
Consultee Full Name	Wokingham Borough Council
Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1484
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comments.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	Yes

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Wokingham Borough Council (WBC) notes that West Berkshire District Council's (WBDC) employment evidence identifies a need for 50,816sqm of office floorspace and a combined 91,109sqm industrial, storage and distribution floorspace over the plan period. Policy SP20 details the strategic approach to addressing economic development needs, Policy SP21 sets out a number of site allocations for industrial land, and Policy DM32 identifies Designated Employment Areas where businesses uses are to be safeguarded. No allocations are made in the Plan for additional office floorspace.</p> <p>The Plan supports the redevelopment and regeneration of existing employment sites. It therefore retains, and identifies new, employment sites which can be intensified to meet some of its identified needs. New allocations for industrial use are anticipated to provide 58,400sqm. However, this is insufficient to meet the full identified needs for industrial land, resulting in a shortfall of 32,709sqm industrial floorspace. There are no estimates provided of how much floorspace the wider policy approach might deliver, and no specific land is identified to provide for office use. As a result, the full identified office need of 50,816sqm remains unmet. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs.</p> <p>Like WBDC, WBC has commissioned a new Employment Land Needs Review, to better understand future economic needs, for both office and industrial/warehousing. The key emerging finding of the report is an increased need for industrial/warehousing floorspace across Wokingham Borough, which reflects changes in both the local and sub-regional economy. The report suggests there is no need for additional office floorspace.</p> <p>Work is ongoing to assess the availability, suitability and deliverability of land promoted for economic uses within Wokingham Borough, as part of the Housing and Economic Land Availability Assessment (HELAA), which will help to inform whether these economic needs can be met. However, given the scale of the need for new industrial/warehousing floorspace arising in Wokingham Borough and the small number of sites promoted for economic uses, at this stage WBC confirms that it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated. Indeed, WBC cannot guarantee meeting the need arising from Wokingham Borough.</p> <p>WBC recognise and support WBDC's ongoing recognition of the arising employment needs and the attempts to reach agreement with other authorities. WBC requests continued engagement with WBDC on this matter as part of the duty to cooperate.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>WBC notes that separate duty to co-operate discussions are ongoing between the two authorities. WBC welcomes these discussions progressing</p>
<p>4. Proposed Changes</p>	N/A
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	No

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Wasing Estate (Represented by Pro Vision)
Consultee Full Name	The Wasing Estate
Consultee Organisation	The Wasing Estate
Agent Full Name	Sarah Pyne
Agent Organisation	Pro Vision
Comment ID	PS1754
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:35:00
Attached Files	Pro Vision (Wasing Estate) App 4 (BRIM3).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>We note that the council have a long history of under-provision of employment floorspace, including offices and industrial uses. The council's most recently published evidence base documents, including the West Berkshire Employment Land Review (ELR) Addendum December 2022 and the Employment Background Paper January 2023, once again identifies a significant shortfall in provision against identified need.</p> <p>As drafted, Policy SP21 allocates four sites (ESA1; ESA2, ESA4; and ESA6) for B2/B8 industrial uses, and two sites (ESA3 and ESA5) for Egjii/B2 (office/industrial) uses. Assuming sites ESA3 and ESA5 adopt a 50%/50% split of these uses, the total quantum of new employment floorspace to be provided for across the plan period is as follows:</p> <ul style="list-style-type: none"> • B2/B8 = 63,001 sqm • Egjii = 5,800 sqm <p>This is clearly significantly below the identified need for 91,109 sqm of industrial floorspace and 50,816 sqm of office space as set out at paragraphs 7.8 and 7.4 of the Draft LPR Proposed Submission Version respectively. The LPR is also clear that these demand figures are a minimum.</p> <p>As such, and at present, it is therefore considered that the plan does not meet the government's aims as set out within the NPPF to build a strong and competitive economy, particularly Paragraph 81 which states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.</p> <p>We note that our client's land at Larkwhistle Farm, Brimpton Common (ref. BRIM3) has not been identified as an allocated employment site, as promoted. The published updated Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) November 2022, states that:</p> <p>"Overall development of the site would have a neutral impact on sustainability. There is a positive impact on economic sustainability as the site is promoted for employment uses. There are a number of unknown sustainability impacts, especially in relation to environmental sustainability as the final use of the site is unknown.</p> <p>Mitigation measures would be required to ensure no negative impacts occurred, and in many cases could result in a positive impact. There are also a number of potential negative impacts on environmental sustainability due to the rural nature of the site requiring car use to access the site, as well as the loss of a greenfield site. Mitigation measures would be required."</p> <p>The Estate object to the council's approach not to allocate this site for much needed employment land on this basis. Firstly, whilst a 'brownfield first' approach is generally supported, it is evident that the lack of available, or suitable brownfield sites means that the council has a duty to consider greenfield sites as alternatives. Secondly, the NPPF paragraph 85 is very clear that in seeking to build a strong and competitive economy, the council should recognise that sites may have to be found in locations that are not well served by public transport:</p> <p>"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on</p>

	<p>foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”</p> <p>As such, we object to the council's approach to selecting suitable sites as it is not consistent with national policy, nor does the LPR result in a positively prepared plan as it does not meet the objectively assessed needs for employment. The LPR is therefore unsound.</p> <p>Previous representations in respect of BRIM3 are appended for the Inspectors consideration (Appendix D) to highlight that this is a suitable location to accommodate new employment development. Whilst technically classified by the NPPF as a 'greenfield site', it is important to note that the site has been previously used for mineral extraction and the resultant land is of poor agricultural quality; development of this site would not, therefore, result in the loss of the best and most versatile agricultural land.</p> <p>We note that council's comments regarding opportunities to improve accessibility by foot, cycling or by public transport and wish to highlight that the Estate's adjoining land ownership means that there would likely be opportunities to facilitate pedestrian access to nearby local facilities through creating a connection to the public footpath network.</p> <p>In conclusion, The Wasing Estate have concerns over a number of the policies as drafted, and overall consider that the plan is not consistent with national planning policy, and particularly the council's strategy and approach in respect of new housing and employment development has not been fully justified. The LPR does not identify sufficient residential or employment sites to meet the district's housing and employment needs. Furthermore, as drafted a number of policies do not provide adequate flexibility and support to existing rural businesses to achieve a prosperous rural economy in West Berkshire. As a result, the Plan is not sound and should be modified to address the concerns in this letter prior to submission.</p> <p>Attachment:</p> <ul style="list-style-type: none"> Appendix 4 - Reg 18 consultation BRIM3
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hope and Clay Construction Ltd (Represented by Pro Vision)
<p>Consultee Full Name</p>	Hope and Clay Construction Ltd
<p>Consultee Organisation</p>	Hope and Clay Construction Ltd
<p>Agent Full Name</p>	Sarah Pyne
<p>Agent Organisation</p>	Pro Vision

Comment ID	PS1581
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:21:00
Attached Files	ProVision (Hope and Clay Construction)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	[See attached for Appendix A] 1.0 Introduction and Background 1.1 These representations are submitted on behalf of our client, Hope & Clay Construction Ltd, in response to the West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation.

Background

1.2 Hope & Clay Construction Ltd are located to the north of the existing Easter Park site, which comprises a variety of employment uses including office (Class E(g)) (formerly B1), light industrial (Class B2) and warehouses (Class B8), as well as sui generis uses for vehicle repair and MOT. Prior to the development of the business park, the site, formed part of a saw mill and charcoal works. To the east of the site lies managed woodland and the Pinelands caravan park, whilst to the north, approximately 90 metres from the site are a line of residential dwellings along Padworth Common. To the north-west of the site is AWE Aldermaston, a nuclear research site.

1.3 Construction of the new Hope & Clay offices and warehouse finished in 2022 following approval by the Council in September 2014 for 1907 sqm of warehouse (B8) building and associated offices (B1a) for the storage of construction machinery and plant with associated access, parking and landscaping (ref. 14/01037/COMIND). At the time of approval, the council's Economic Development Officer considered that *"If Hope and Clay Ltd are able to consolidate onto one site, it is very likely that the business will be able to grow and develop further, employing more people and contributing to the local supply chain."*

1.4 Despite the site's long standing and existing use as an employment site, Easter Park is located in land outside of the defined settlement boundary and is not recognised within the adopted local plan as a Protected Employment Area as listed at Appendix G of the adopted Core Strategy. Currently, the adopted policy position for development at Easter Park is set out at Policy CS9 of the Core Strategy which states that, with regard to proposals outside of defined employment areas it states proposals for business/B8 uses will be assessed against compatibility with uses in the area surrounding the proposal and capacity and impact on the road network.

1.5 The Core Strategy Paragraph 5.46 also identifies a shortfall of B8 floorspace of approximately 24,000sqm in the district and a significant shortfall of 121,000 sqm of office space.

Housing and Economic Land Availability Assessment (HELAA) February 2020

1.6 Land adjacent to Easter Park ('Land off Benyon Road, Easter Park, Tadley') has been promoted for Employment (B1, B2 and B8) uses with an identified capacity of 8,400 sqm of floorspace. The assessment of the site was first set out within the Housing and Economic Land Availability Assessment (HELAA) in February 2020 (HELAA ref. ALD6).

1.7 Consistent with the methodology, the site was not automatically excluded from the site assessment at Stage 1b despite its noted location within the inner Atomic Weapons Establishment (AWE) Aldermaston planning consultation zone, with the document noting that *"Whilst the HELAA methodology identifies notified safety zones as an automatic exclusion criteria, it also states that the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. This assessment will be undertaken in stage 2 of the HELAA."*

1.8 At Stage 2, the site's location adjacent to an existing employment (industrial) area was noted, as was the fact that this industrial estate is not a Protected Employment Area. Stage 2 concluded with: *"The proposed commercial use would have to be considered carefully with respect to management and control in an emergency due to its proximity to the AWE. Site is adjacent to an existing employment area, and so allocation would be dependent on a review of the District's employment needs through the Local Plan Review. Further information required on a number of matters, including highways and ecology, before a robust decision can be made."* It was identified as being available, achievable and *"potentially developable in part"*.

Local Plan Review 2020-2037 Emerging Draft December 2020

1.9 In December 2020 the council published their Local Plan Review 2020-2037 Emerging Draft, informed by a number of evidence base documents, including the HELAA (2020), the Employment Land Review (2020) the Western Berkshire Functional Economic Market Area Assessment (FEMA) (2016) and the West Berkshire Economic Development Needs Assessment (EDNA) (2016).

1.10 Draft Policy SP20 made provision for 62,00 sqm of office (Class E) floorspace and 65,000sqm of industrial, storage and distribution floorspace in the District over the plan period, seeking to address the shortage as outlined in the Employment Land Review (2020), which stated:

"We estimate that as a minimum 65,000 sq m of new floorspace should be provided for office use in the next plan... The Council should scope the next generation of policies so that, if market demand for offices strengthens, it is clear that the 65,000 sq m requirement is a minimum and policy is flexible and supportive for all forms of office development." (Paragraphs 10 and 11); and

"... Demand is also more pressing given the current market shortage, and there is a need to frontload the plan with 16 ha of easily deliverable sites. Four or possibly five potentially suitable sites are identified through the HELAA that are capable of meeting the need for industrial floorspace. All of these sites are extensions to existing employment areas, and these are in the main area of market demand in the east of the District." (Paragraph 12)

1.11 The findings of the Employment Land Review document (dated August 2020) prepared by Stantec in relation to industrial, storage and distribution floorspace also reflect earlier findings of the Berkshire Functional Economic Market Area Assessment (FEMA) and Western Berkshire Economic Development Needs Assessment (EDNA) produced in 2016. The executive summary of the EDNA concluded that: *"Demand for industrial space remains strong and very low levels of vacancy reflect a limited supply of industrial accommodation (particularly modern, good quality space). Development of new industrial space in the FEMA has been limited in recent years, with much of the existing stock relatively dated and in need of refurbishment. Local commercial property agents report that demand for industrial premises is currently outstripping supply, and an upward trend in industrial rental values in recent years has led to new speculative industrial development being just about viable within the FEMA. The key issue going forward is a lack of new land and/or space to accommodate new development."*

1.12 Therefore it was clear that provision of additional floorspace proposed by draft Policy SP20, including through the creation of new Designated Employment Areas (DEAs) and extensions to existing DEAs, would go some way to meeting the overall demonstrated need.

1.13 Furthermore, the ELR (2020) made a series of recommendations to the council. This included to:

- Consider allocating the site for industrial uses ALD6 Land off Benyon Road, Easter Park, Tadley; and, furthermore;

Designate as (Protected Employment Areas (PEAs) Greenham Business Park, the Vodafone Campus, **Easter Park**, Langley Business Court, and the Old Mill Trading Estate. (Our emphasis added);

- It clarifies: *“The PEAs are designated for B class use, and their boundaries and role should be reviewed to achieve a balanced portfolio to meet future requirements. There is a general presumption for employment generating uses within the PEAs and against non-employment uses”*; and
- Para 4.155 of the ELR document recommends *“Easter Park – is a modern business park to the south-east of AWE Aldermaston, and comprises office, light industrial and warehousing activity. There is one small remaining parcel that has permission for warehousing. **The Park should be designated as a PEA.** Land adjoining to the northeast is promoted through the Call for Sites (ALD6 2.1 ha), and is within an area of market attraction for employment uses, and we would support the inclusion of ALD6 within the Easter Park PEA designation.”* (Our emphasis added).

1.14 As such, and following the recommendations of the EMR, Regulation 18 draft Local Plan Draft Policy SP21 ‘Sites allocated for economic development’ sought to a) classify formally Easter Park as an existing employment area by designating it as a ‘Designated Employment Area’ but also b) propose an extension of the site to achieve 8,400 sqm of new employment floorspace. The site was proposed as Site Allocation EMP3.

1.15 Draft Policy SP4 (and supporting Figure 3) identified that Easter Park in its entirety falls within the Detailed Emergency Planning Zone (DEPZ) of Atomic Weapons Establishment (AWE) Aldermaston, which are regulated by the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPPIR). The draft policy stated that *“In the interests of public safety, residential development in the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) has advised against that development.”* It went on to state that consultation arrangements for planning applications within the DEPZ, for any new development that could lead to an increase in residential or non-residential population (thus impacting on the off-site emergency plan) will be undertaken with the Office for Nuclear Regulation (ONR).

1.16 As such it is considered that the proposed allocation of the site adjacent to Easter Park under Draft Policy SP21 was made with full regard to site’s location within the DEPZ and the Government Regulations related to Radiation Emergency Preparedness.

1.17 In support of the proposed allocation of the site for employment development in the draft Local Plan, and to address points raised in the HELAA, Hope & Clay construction submitted the following information to further demonstrate that the site is suitable for development:

- Preliminary Ecological Appraisal.
- Illustrative Masterplan.
- Transport Assessment.

1.18 The submitted Illustrative Masterplan showed how the proposed expansion of Easter Park, on land adjacent to the existing Hope & Clay site, would deliver approximately 8,245 sqm of employment floorspace (GEA) (broadly in line with the proposed allocation), made up of 3,745 sqm of class E(g) (formerly B1) floorspace; 2,160 sqm of class B2 floorspace; and 2340 sqm of class B8 floorspace, across five units, ensuring an appropriate balance between site coverage and site constraints i.e. the required restoration area/buffers/wayleave.

2.0 Representations to Local Plan Review Proposed Submission (Regulation 19) Consultation

2.1 The purpose of a Regulation 19 consultation is to ensure that the plan is legally compliant and sound. To ensure the local plan is sound, it should be:

- Positively prepared - Provides a strategy which, as a minimum, seeks to meet West Berkshire Council’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- Justified – ensuring that the Plan provides an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – ensuring that it is deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy - Enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF) and other statements of national planning policy, where relevant.

2.2 It is in light of these criteria that the Local Plan Review Proposed Submission (Regulation 19) version has been considered.

Policy SP4 ‘AWE Aldermaston and Burghfield’ / Draft Policy SP20 ‘Strategic Approach to Employment Land’ / SP21 ‘Sites Allocated for Employment Land’

2.3 Representation are made in regards to West Berkshire Council’s proposed amendments to Policy SP21 which have since removed Easter Park as a proposed Designated Employment Area, and therefore remove EMP3 Land off Benyon Road, Easter Park as a proposed Extensions to Designated Employment Area. In short, the consultation revisions to Draft Policy SP21 confirm that West Berkshire Council are

no longer proposing to allocate Easter Park as designated employment site, nor are they considering its extension for additional employment floorspace.

2.4 The published updated Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) November 2022, with regards to the site's expansion, site 'ALD6 Land off Benyon Road, Easter Park', simply states that:

"The site will not be taken forward. The site is located within the AWE DEPZ and therefore, it is not considered suitable for development."

2.5 As such, comments in respect of Draft Policy SP21 are interlinked with the council's approach to new development within the DEPZ of Atomic Weapons Establishment (AWE) Aldermaston, as set out at Draft Policy SP4, and so the two are considered together below.

2.6 On 22 May 2019, the government introduced the new Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019 to strengthen the national emergency preparedness and response arrangements for radiological emergencies. In essence, the regulations are designed to provide a framework for dealing with a potential radiation emergency arising from sites such as AWE Aldermaston. Regulation 8 requires that the local authorities are responsible for setting Detailed Emergency Planning Zones (DEPZ) for nuclear sites where there could be a radiation emergency with off-site consequences, on the basis of the operator's recommendations. Regulation 11 requires that the local authority must prepare an off-site emergency plan for responding to such an emergency, within the DEPZ area. It is not disputed that the site at Easter Park is within the DEPZ of AWE Aldermaston. West Berkshire Council's website indicates that an Off-Site emergency plan is being developed in the Spring of 2023, but also states that this document is "**not a public plan**."

2.7 Paragraph 5.1.4 and Table 17 of the SA/SEA Environmental Report November 2022 provide the council's commentary on changes to Policy SP4 related to AWE Aldermaston (and Burghfield), including to suggest that any new development within the DEPZ will likely be refused (where previously this was limited to residential development), and state that changes "*reflect new information on DEPZ and off-site emergency plans*". It summarises that the changes are likely to result in negative impacts on social sustainability as the policy seeks to restrict development (residential and employment) from taking place within the DEPZ, and therefore, there will be impacts on the provision of housing, affordable housing and new employment opportunities in the area. We therefore consider this to be a fundamentally flawed approach, for reasons set out below.

2.8 In the first instance, it is important to note that the only change in circumstance to the council's assessment of the site at Easter Park has been the submission by Hope & Clay Construction Ltd of additional supporting information in respect of ecology and highways, in addition to a masterplan demonstrating how additional employment floorspace on the site can be suitably and realistically achieved.

2.9 The updated HELAA (January 2023) once again confirms (paragraph 2.22) that sites within notified safety zones (eg AWE Aldermaston) will not automatically be excluded and instead that "*the impact will be assessed on merits, taking into account the type of development and the nature of the hazard. Therefore sites within notified safety zones have gone through to Stage 2 of the HELAA (site assessment) and advice from the Ministry of Defence has been fed into the site assessments.*" Appendix 4 of the HELAA once again concludes that that the site is available, achievable and 'potentially developable'.

2.10 Therefore, it is evident the recommendation drawn by the SA/SEA 2022 is clearly inconsistent with the conclusions of the HELAA and the HELAA methodology, and **no clear reason has been provided by the council as to why this suitable employment site is ruled out purely because of its location within the AWE Aldermaston DEPZ.**

2.11 In respect of the site's location within the DEPZ, the Regulation 18 draft Local Plan was published for consultation after the REPPiR Radiation (Emergency Preparedness and Public Information) Regulations 2019 were revised, and therefore it is reasonable to assume that the Council would have taken account of these Regulations in the preparation of that plan and in the formal allocation of Easter Park as an Designated Employment Site, and in the allocation of adjacent land for its expansion.

2.12 At the time of preparation of the Regulation 18 draft plan there had been no increase in risk at AWE Aldermaston: in the AWE Detailed Emergency Planning Zone Report dated 4 March 2020 prepared by the Council's Emergency Planner Ms Richardson for Members of West Berkshire Council it was stated in Section 3 under the heading "*risk management*", that "*It is important to note that there are no changes in activity on the AWE sites, and there is no greater risk to the public than before this legislation was introduced.*" This is repeated in the conclusion at paragraph 7.1. Subsequently, a further 'declaration of no change' for AWE Aldermaston was issued in November 2022.

2.13 Nevertheless, and importantly, the Regulations and the Guidance do not preclude development within the DEPZ. They do not state anywhere that development should be prevented from coming forward just because it is in the DEPZ. On the contrary, REPPiR Regulations recognise that the population within the DEPZ will naturally change within the life of the emergency plan hence why Regulation 12 of REPPiR requires the Council to, at intervals not exceeding three years, review and revise the emergency plan. The Regulations also envisage that development will come forward within the DEPZ, and there are many passages in the Guidance which acknowledge that development will take place in the DEPZ, particularly Paragraph 250: "*In order to understand if a change in the local area necessitates a redetermination [of the DEPZ], the local authority should consider developments within or adjacent to the detailed emergency planning zone taking into account their potential impact on the effectiveness of the emergency plan.*"

2.14 As such, it is only the Council's role to consider whether the Proposed Development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint to development. In short, the REPPiR-19 does not support the Council's moratorium on development in the DEPZ.

2.15 In respect of the council's reference to new information regarding off-site plans, as this key piece of evidence has not been made publicly available, the approach to amending the local plan to prohibit development on this basis is unjustified. Nevertheless, Paragraph 13 of the appeal decision at Boundary

Hall, Tadley in 2011 (a copy of the SoS decision is provided at Appendix A), confirms the Secretary of State's conclusion an off site plan is designed to be flexible and can be amended to accommodate the implementation of development proposals: "*the Off Site Plan is designed to be flexible and extendable and that, while it is possible that the implementation of the application scheme would necessitate changes to the Plan, the evidence does not lead to the conclusion that the Plan would fail*". (paragraph 13).

2.16 As such, we consider that the strategy is simply not justified or informed by the evidence, and that the council's misguided approach to the role of the REPRIR has significant repercussions to the delivery of much needed employment floorspace, and the objective of sustainable development, which includes balancing employment opportunities with providing new homes and conserving the environment. It is also considered that, given that the starting point for development should be that there is a presumption in favour of sustainable development (NPPF Paragraph 10), we do not consider that the Plan, particularly Policy SP4 (particularly in reference to development likely being refused) has been positively prepared.

2.17 The Council's approach risks undermining the long term viability of this existing and established employment site. Without recognition of its existing status, or enabling suitable opportunities for growth, the site is restricted by countryside policy; furthermore if it becomes unviable that businesses cease to operate from the site, the result will be a vacant, sterilized, previously developed site.

2.18 As stated above, the council have a long history of under-provision of employment floorspace, including offices and industrial uses. The council's most recently published evidence base documents, including the West Berkshire Employment Land Review (ELR) Addendum December 2022 and the Employment Background Paper January 2023, once again identifies a significant shortfall in provision against identified need.

2.19 As drafted, Policy SP21 allocates four sites (ESA1; ESA2, ESA4; and ESA6) for B2/B8 industrial uses, and two sites (ESA3 and ESA5) for Egiii/B2 (office/industrial) uses. Assuming sites ESA3 and ESA5 adopt a 50%/50% split of these uses, the total quantum of new employment floorspace to be provided for across the plan period is as follows:

- B2/B8 = 63,001 sqm
- Egiii = 5,800 sqm

2.20 This is significantly below the identified need for 91,109 sqm of industrial floorspace and 50,816 sqm of office space as set out at paragraphs 7.8 and 7.4 of the Draft LPR Proposed Submission Version respectively. The LPR is also clear that these demand figures are a minimum. As such, and at present, it is therefore considered that the plan does not meet the government's aims as set out within the NPPF to build a strong and competitive economy, particularly Paragraph 81 which states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.

3.0 Conclusion

3.1 In conclusion Hope & Clay Construction Ltd object to the West Berkshire Council Regulation 19 submission version of the Local Plan Review (LPR) to 2039 on the basis that it has not provided an appropriate, evidence-based strategy for development. It is considered unsound for the following reasons:

- The LPR fails to recognise and support the growth of existing employment sites including Easter Park and risks undermining their success and viability, which is inconsistent with national planning policy;
- There is a significant shortfall in employment land provision and the LPR does not identify sufficient additional employment sites to meet the district's employment needs in the context of a consistent under-supply. This is inconsistent with national planning policy;
- The proposed removal of Easter Park and proposed extension (site ref. ALD6 - Land off Benyon Road, Easter Park) due solely to the location of these sites within the DEPZ of AWE Aldermaston, has been done so without due regard for the remit of the REPRIR (2019) regulations and is inconsistent with the available evidence base. We consider that complete change of position is not justified by the DEPZ issues, which does not represent a moratorium on development. We consider this strategy to be unjustified and draft Policy SP4 not to have been positively prepared.

3.2 As a result, the Plan is not sound and should be modified to address the concerns in this letter prior to submission. We trust this Statement clearly sets out our client's position at this stage and respectively request that the above is given due consideration as part of any examination into the West Berkshire Local Plan. Our client would like the option of participating in the examination of the plan to elaborate on these matters.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1434
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? -	Yes

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Support the removal of site EMP6 (Land north of Arlington Business 20,000 Park, Theale East Business Centre) since the Reg18 stage. This site was completely unsuitable because it:</p> <ul style="list-style-type: none"> • Would have eroded the gap between the settlements of Theale and Calcot, contrary to policy SP1 • The site is liable to surface water and groundwater flooding • The water table is only 25cm below the surface (as per drainage officer comments on the HELAA), precluding SUDS
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Newbury Community Football Club (Represented by DPDS Consulting Group)
Consultee Full Name	Newbury Community Football Club
Consultee Organisation	Newbury Community Football Club
Agent Full Name	Les Durrant
Agent Organisation	DPDS Ltd
Comment ID	PS906
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Our main concern is that the whole approach to the regeneration of the LRIE is unsound on account of the lack of a proper planning policy context and site-specific guidance to control the development or redevelopment of the area – the strategy is inappropriate for a development of this scale.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	In addition to a site-specific policy, it is recommended that the LRIE is added to Table 4 of Policy SP21 Sites Allocated for Employment Land.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1276
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>We believe the approach is too passive. If "Positively Prepared" means working with all local stakeholders and in particular landowners, it is clear to us that certain key stakeholders could have been persuaded to resolve the issue of lack of employment sites in suitable locations.</p> <p>Newbury Town Council under a Conservative administration resolved to include development of Newbury Showground as part of its Vision under successive political administrations since 2018. The site is very convenient for the occasional events held there by the Newbury & District Agricultural Society (NDAS), aimed largely at the rural business sector.</p> <p>However this site, now largely Brownfield although located in planning terms in open countryside just inside the AONB, is much under-used. We are aware that there is significant – but not majority - support for further development within NDAS membership at present but we would expect and wish for the trend to continue towards making the Showground a hub for distribution, led by its situation at the geographic centre of the AONB but also easily accessible by the national highway network and within close reach of a varied workforce in Newbury & Thatcham We also believe it could enhance its appeal over the Plan period as a rural business hub for a wider area of North Wessex & beyond.</p> <p>It also links to the Council's unanimous aspiration to redevelop the London Road Industrial Estate (LRIE), which is a DEA owned by the Council. Our view is that, in the short to medium term, some business occupiers at LRIE might be relocated to the Showground to enable that site to be redeveloped earlier in the Plan period than is otherwise likely. As stated in 7.7 "there is little or no viability in the [office development] market" at present, so the current range of LRIE business occupiers is likely to remain,</p>

	<p>leaving the “[un]attractive environment for modern day use” (7.10) there for the foreseeable future – as it has been for the past 20 years since the Council first realised its estate was seriously in need of redevelopment. As per 7.6: “market signals are generally not sufficient to trigger new build office development on a speculative basis”. That seems to be admitting that LRIE will not be redeveloped for purely commercial use any time soon.</p> <p>We also have concerns that by encouraging office development in DEAs (as implied in 7.7 second sentence) such as LRIE, where there are many ‘blue collar’ jobs in the motor industry, the future viability of these businesses may be endangered unless there are other employment sites within a short distance from their customer and employee base. These businesses could therefore be relocated at the Showground.</p> <p>There is currently not enough evidence that the policy is Justified or Effective. We have no confidence that LRIE will be redeveloped for commercial use within the Plan period without significant proactive intervention in the employment land market by the District Council. The Liberal Democrat Group is of the view that by allowing the re-provisioning of the football facility in Faraday Road and by implementing the consented Gateway Plaza (despite and indeed because its residential component will improve the overall financial viability of LRIE redevelopment) the Council will attract significant interest in commercial development of the rest of the site, provided some of its current occupiers can be relocated at least temporarily. This is touched on also in our response to SP12.</p> <p>We would like to see the Council reaching out to NDAS and all rural businesses through the newly formed West Berkshire Rural Business Forum, the North Wessex Downs AONB Management Board and local councils across the District with its “vast rural area that is host to a large number of small and medium sized enterprises” (7.16) and beyond and to work up a strategy that sees Newbury Showground become a hub for the North Wessex rural business community.</p> <p>This could perhaps also relieve Membury of some of the HGV traffic that currently this Council is helping to impose on minor rural roads (e.g. Ermin Street) by allocating employment sites relatively remote from where their workforce live. Membury is not sustainable and its use for employment has harmed the AONB significantly more than we believe Newbury Showground would. We know that unauthorised and uncontrolled access through Membury Services is made by vehicles on journeys generated by this employment area, because that cuts 5 miles off the journey onto the M4 at J14.</p> <p>This is a matter outside of the control of the Council as Local Highway and Planning Authority but unless it is properly legislated for and enforced, J13 in contrast involves less than 8 miles distance from the national highway network and is 12 miles nearer Newbury than Membury and immediately adjacent to the Showground. It would be far more suitable than Membury as a dedicated employment area.</p> <p>Having a major distribution centre at the Showground is likely to also reduce demand for such development at Colthrop, which would in turn reduce the number of HGVs using the A4 through Newbury & Thatcham. This would encourage greater uptake of active travel on the A4 and its feeder roads and therefore be more consistent with national policy.</p> <p>Although Newbury Showground appears to be largely greenfield land and is used for part of the year for grazing, it has substantial areas of hardstanding and several permanent buildings on it. The Newbury Racecourse site was treated as a brownfield site when it was allocated for housing and the proportion of previously developed land on both sites is similar. It also supports some existing employment. Therefore it complies with ‘d’ of policy SP20.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Not applicable because NDAS is not one of the statutory bodies listed in the Duty to Cooperate</p>
<p>4. Proposed Changes</p>	<p>We have no proposals to change SP20 or its supporting text, which is worthy but likely to be ineffective without changes to SP21 and the list of DEAs, as suggested below.</p> <p>In SP21, delete ESA3 (in Membury) including reference to it in 7.25 and add Newbury Showground.</p> <p>We would need supporting text adding for the Showground, based on the wording in the above section.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain further and provide evidence in support of the above.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Woodlanders Protection Group
Consultee Full Name	Anthony King
Consultee Organisation	Woodlanders Protection Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1228
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<i>IT IS NOT CLEAR THAT ALL LEGAL REQUIREMENTS ARE MET</i>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	No

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>FOR SPECIFIC AREAS SOME OF THESE CONDITIONS HAVE NOT BEEN MET</i></p> <p>Infrastructure Delivery Plan</p> <p>Table4</p> <p>ES 2 and ES 3 total land = 15581sq m Floorspace-Membury Total= 63581sq m for West Berks</p> <p>Therefore §25% of all the industrial floor space is in an area described by the consultants on economics and land use.</p> <p>In a supporting document, Stantec, consultants on employment and land use demand, have stated, regarding Membury, that there is weak market demand and little employment demand. All the demand and population is in the East of the WBC area. In addition they have stated that any distribution businesses should be close to Motorway junctions. Membury is 7km from a motorway junction along a series of country lanes, some undesignated.</p> <p>CI 5.92 “.it is important that employers are encouraged to recruit local people in order to boost the local economy and reduce the need to commute long distances by car.”</p> <p>There is little availability of a local workforce and many will have to drive long distances by private cars or be bussed in. Hence the Objection of some council officers on the use of Membury sites in the future, as they are unsustainable</p> <p>For example on Walkers Logistics current sites at Membury most of the workforce is bussed in from Reading and Swindon. The current proposal for LAM 6 will only make this worse.</p> <p>5.129 and 5.130 “all the development at Membury removes a healthy environmental.....”</p> <p>The generation of traffic from Membury, including significant HGV movements, has removed any leisure activities such as Walking, Cycling or Horse Riding from the local area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>ALL REFERENCES TO ADDITIONAL INDUSTRIAL DEVELOPMENT AT MEMBURY ES2 AND ES3 SHOULD BE REMOVED.</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p><i>BECAUSE THERE ARE COMPLEX ISSUE4S AND EVIDENCE THAT NEEDS TO BE EXAMINED</i></p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Green Park Reading No.1 LLP (GPR) (Represented by Deloitte)
Consultee Full Name	Green Park Reading No1. LLP (GPR)
Consultee Organisation	Green Park Reading No.1 LLP (GPR)
Agent Full Name	Phil Wright
Agent Organisation	Deloitte
Comment ID	PS1218
Chapter / Policy / Appendix Number	Policy SP 21
Chapter / Policy / Appendix Title	Sites Allocated for Employment Land
Order	71
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:50:00
Attached Files	Deloitte obo Green Park Reading No1 LLP_Figure 1.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>West Berkshire Local Plan Review to 2039 – Regulation 19 Proposed Submission Consultation</p> <p>We write on behalf of our client Green Park Reading No.1 LLP, which is the owner of Green Park. Green Park Reading No.1 LLP (“GPR”) is ultimately wholly owned by Mapletree Investments Pte Ltd (“Mapletree”). This response relates to the Regulation 19 Proposed Submission Consultation of the West Berkshire Local Plan Review (“the LPR”), which is open for comment until 3 March 2023. Deloitte previously responded to two Regulation 18 Consultations on behalf of GPR on 21 December 2018 and 5 February 2021.</p> <p>In writing this letter, we do so under the statutory provisions of a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Background to Green Park</p> <p>Since acquiring GPR in 2016, Mapletree has been reviewing the Park’s potential, undertaking asset management and considering future opportunities. GPR is keen to support the Council in achieving sustainable development in the Borough.</p> <p>Green Park is a premier business park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of the three local authority areas, covering a 79-hectare plot offering high quality office stock and associated amenities, located around a central body of water.</p> <p>Green Park is accessed from the A33 relief road and is located south of Reading town centre. The Park is home to a variety of office occupiers across a range of business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.</p> <p>The Park continues to be highly successful with ongoing interest from both global and smaller companies for office space. In 2016/17, Aukett Swanke undertook a refresh of the Fosters masterplan prepared in 1998 in order to update the development potential of the Park. Mapletree continue to look for opportunities to respond to market demand and manage the planned growth of the Park in a sustainable way. Securing an allocation for employment uses on land at 900 South Oak Way forms part of this ambition (referred to hereafter as the Site (see Figure 1 below)).</p> <p><i>[See attached map - PS1218 Deloitte obo Green Park Reading_Figure 1]</i></p> <p>Previous Response to Regulation 18 Draft Local Plan</p> <p>On behalf of GPR, Deloitte submitted formal representations in response to the LBW Pre-Publication (Regulation 18) Draft Local Plan on 21 December 2018 and 5 February 2021. As part of the previous consultation, GPR proposed a series of changes, including the below:</p> <ul style="list-style-type: none"> • Requested that Green Park was included as a Designated Employment Area; • Requested an emphasis on the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park; • Requested support for Data Centres; and, • Requested clarification be added to Policy SP 4 that although the Office for Nuclear Regulation will be consulted, it is unlikely this will restrict non-residential development in the Detailed Emergency Planning Zone (DEPZ). <p>Local Plan Regulation 19 Response</p> <p><u>Policy SP21: Sites Allocated for Employment Land Policy</u></p> <p>SP21 identifies three sites that are well established employment areas and sets out that their importance to the local economy will be recognised by classifying them as Designated Employment Areas.</p> <p>The majority of Green Park falls within the administrative boundary of Reading Borough Council and is designated as a Core Employment Area in the adopted Reading Borough Council Local Plan. As a result, GPR consider it appropriate for the area identified above, the Site, to be classified as a Designated Employment Area to reflect its existing approved office uses. GPR reiterates its request that Policy SP21 be amended to include Green Park and for the Site to be allocated as a Designated Employment Area.</p> <p>In accordance with Paragraph 24 of the National Planning Policy Framework, which sets out the need for Local Planning Authorities to cooperate with each other on strategic matters crossing administrative boundaries, GPR considers that classifying the Site as a Designated Employment Area would provide</p>

	<p>continuity to the existing Core Employment Area which falls within the boundary of Reading Borough Council.</p> <p>The Employment Land Review (ELR) which supports the LPR identifies that a minimum of 50,816 sqm of office floor space will be required over the plan period. Classifying the Site as a Designated Employment Area will support cases where suitable office and business uses come forward for this area of Green Park and will help provide a future pipeline of employment land to meet longer term demand. This will allow for the sustainable growth of office and business space at an existing and well-established employment location. In particular, the imminent opening of Green Park Railway Station makes it a very sustainable location for a Designated Employment Area.</p> <p>Summary</p> <p>In summary, GPR welcomes the West Berkshire LPR and the published Regulation 19 document. However, GPR requests several modifications to the LPR as set out in this letter. In particular, GPR requests that the identified Site is classified as a Designated Employment Area to reflect its existing uses and its existing allocation, and that additional guidance is given in relation to the consultation process and considerations for development located within a DEPZ.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Policy SP 22 Town and District Centres

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS175
Chapter / Policy / Appendix Number	Policy SP 22
Chapter / Policy / Appendix Title	Town and District Centres
Order	75
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	West Berkshire town and village centres are with few exceptions governed by Conservation Areas, to which development of the centres should be subject. The above remarks under SP9 therefore apply.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hoddinott, Keith
<p>Consultee Full Name</p>	Keith Hoddinott
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS485
<p>Chapter / Policy / Appendix Number</p>	Policy SP 22
<p>Chapter / Policy / Appendix Title</p>	Town and District Centres
<p>Order</p>	75
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web * Unknown</p>	Letter

Response Date	02/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Newbury Town Centre Design should be innovative to encompass greater footfall along streets, with planning requirements to have many more small shops, offices, & small businesses at ground level under apartments etc., with ample car parking (& for emergency services & deliveries) at ground or underground levels. The developer's proposals are too high & dwarf the ancient (presumably listed buildings) church & town hall. Any new developments should be no higher than the base of the clock tower on the town hall.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS607
Chapter / Policy / Appendix Number	Policy SP 22
Chapter / Policy / Appendix Title	Town and District Centres
Order	75
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>20. SP22. "Development proposals for main town centre.....". Theale's 57.3% increase in houses would have an adverse impact on the local network. Theale High Street already has insufficient parking and most of the High Street is single vehicle width due to parked vehicles and traffic calming give way areas. The traffic does not flow through the High Street due to this and there is often congestion.</p> <p>21. SP22. The Plan states a wish to 'retain our district centre' yet the Plan would shrink Theale village centre and thus the Plan conflicts. There is also shrinking in infrastructure.</p> <p>22. SP22. "Retail uses will be encouraged....". Many of Theale's shops have been or are converting to residential in the High Street. The Plan states a need for an increase in office space yet in Theale there are many either empty or have conversions to residential. 7.4 – There has been a large shift towards hybrid working which means that less office space is required. The Plan conflicts concerning the need for expansion and evidence should be provided to substantiate the claim.</p> <p>23. Town & District Centres, 7.43. Theale has had no leisure investment and no local leisure facilities are accessible by public transport. This needs to be reflected in the Plan.</p> <p>24. 8. With regards to infrastructure, the Plan needs to state that there is an urgent requirement for an increase in medical/hospital provision as local hospitals and GP surgeries are already at capacity.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wokingham Borough Council
Consultee Full Name	Wokingham Borough Council
Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1486
Chapter / Policy / Appendix Number	Policy SP 22
Chapter / Policy / Appendix Title	Town and District Centres
Order	75
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	Yes

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Regarding retail, the Plan identifies a hierarchy of centres and designates primary shopping areas. It supports development for town centre uses that contributes to vitality and viability of these centres and provides for changes of use away from retail, only in certain circumstances. The Plan also designates a number of Retail Parks to safeguard retail and leisure uses. It does not identify any specific allocations for retail floorspace.</p> <p>The Plan sets out a commitment to review retail evidence within the first 5 years of the Plan, owing to significant changes brought about by Brexit and COVID19 making it impractical to update its evidence in a meaningful way. WBDC's existing evidence from 2016 (The Western Berkshire Retail and Commercial Leisure Assessment jointly prepared with WBC, RBC, and BFBC) identified a need for 25,600sqm comparison retail floorspace in West Berkshire to 2036. This represents a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC has embarked upon an update to retail and commercial leisure evidence as part of its own emerging Local Plan Update. Given the significant need previously identified, WBC stresses the importance of WBDC's evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	WBC notes that separate duty to co-operate discussions are ongoing between the two authorities. WBC welcomes these discussions progressing
<p>4. Proposed Changes</p>	N/A
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Valley Chamber of Commerce (Represented by DPDS Consulting Group Ltd)
Consultee Full Name	Mr Paul Britton
Consultee Organisation	Thames Valley Chamber of Commerce
Agent Full Name	Ms Mandy Wetherell
Agent Organisation	DPDS Consulting Group Ltd
Comment ID	PS1627
Chapter / Policy / Appendix Number	Policy SP 22
Chapter / Policy / Appendix Title	Town and District Centres
Order	75
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:22:00
Attached Files	DPDS obo TVCC_attachment_full rep_redacted
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><See attached report for full representation - DPDS obo TVCC_attachment_full rep_redacted></p> <p><u>Policy SP22 Town and District Centres</u></p> <p>The Chamber supports the Council's goal of maintaining and enhancing the vitality and viability of West Berkshire's town and district centres, in line with the stated Local Policy Priority of "Supporting initiatives that re-imagine Newbury town centre encourage appropriate levels of investment and active town centre management that will help secure their future vitality, vibrancy, and employment opportunities".</p> <p>However, the policy is somewhat lacking in the re-imagination element of the Priority and could do more to ensure that Newbury town centre, as well as other town centres across West Berkshire, remain dynamic and can retain their retail offer and attract inward investment.</p> <p>Conclusion</p> <p>These representations have outlined West Berkshire Chamber of Commerce's concerns as to the soundness of the Local Plan preparation process. The primary concern of WBCC is that the proposed policies regarding designated employment areas, in particular SP20 as exemplified by the Council's approach to LRIE, are unsound and do not go far enough to ensure that the development or redevelopment of DEAs across the district is sustainable and creates the best conditions for attracting inward investment. This is as well as the policies potentially not being appropriately justified. As they are, the policies run the risk of enabling piecemeal development at Designated Employment Areas which would result in a lower quality of land available for business use as well as potentially resulting in vital environmental investigation not being able to take place.</p> <p>As such, various modifications have been proposed to ensure the soundness of the Local Plan. Most importantly, a development-plan and SEA led framework of criteria-based site specific policies for each DEA should be adopted which would guarantee that development or redevelopment is sustainable and can create the best conditions for inwards investment and regeneration. There have also been several wider minor comments and representations on other policies throughout the Local Plan.</p> <p>To conclude, these representations have concluded that the Proposed Local Plan is potentially unsound and we therefore respectfully request that the sentiments of these representations be fully considered and reflected in further Modification to the submitted Local Plan.</p> <p>The proposed changes within this form also concern policies other than Policy SP20, but these have not been made the subject of additional representation forms as the changes are dependent on the content of the main representation on the policy.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	We believe it is necessary as we are proposing significant modifications and the content of our representations is important.
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS843
Chapter / Policy / Appendix Number	Policy SP 22
Chapter / Policy / Appendix Title	Town and District Centres
Order	75
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf PS843 Paula Saunderson - Newbury Town Centre Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>SP21 – TOWN & DISTRICT CENTRES Need a specific Policy for Newbury as the only MAJOR TOWN CENTRE</p> <p>THE SPATIAL AREAS Retail & Commercial Areas within the Newbury Settlement Area Within Chpt 7 there is no Strategic Policy for Retail and Commercial Space. I feel this is an omission and the subject is not adequately covered under SP22 – Town & District Centres.</p> <p>Many Retail Sites Within Newbury there are many and varied Retail & Commercial Spaces yet the only Map I can find for these is this one for the <u>Town Centre Retail Area</u> which I presume will be changed to the new Red Line under this LPR? <i>[See attachment PS843 Paula Saunderson – Newbury Town Centre Plan]</i> There is no big Out of Town Retail Area and commuting between the existing Retail Areas is common. This is mainly by Car/Van due to the nature of goods being purchased. And we don't have a Car City so residents shopping for vehicles are travelling between spread sites at either ends of Newbury. Recent Retail growth with a new LIDL Store along the <u>Clayhill A4 Corridor Retail Area</u>, and built on the Floodplains, have given rise to poor Town Planning with Flooding and smells from the Drainage. And it is obvious that the Buffer Zones for the Kennet SSSI were not considered with this site, and the state-of-the-art modern SuDS are not working. Likewise the <u>Wash Common & Greenham Retail Area</u> is growing without Policy in place. Whilst this will be closer to Sandleford housing than the Town Centre and Clayhill A4 Retail Centres there will still be journeying between the 3 Areas. Because there is no SP for Retail & Commercial under Chpt 7, Existing Retail & Commercial Areas are not mapped on the LPR Policies Map and there is no over-arching Policy for Retail & Commercial which allows a DM to be put in place for Key Retail Centres</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes

5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1436
Chapter / Policy / Appendix Number	Policy SP 22
Chapter / Policy / Appendix Title	Town and District Centres
Order	75
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The statement “New office developments within Designated Employment areas (DEA) will be exempt from the sequential test in accordance with Policy SP20” will endanger the viability of town and district centres</p> <p>The sentence “changes of use within the primary shopping area from Class E to other uses will be permitted where they do not result in a disproportionate concentration of non-Class E units that would be harmful to the vitality of that centre” is not sufficiently restrictive and would allow the viability and vitality of shopping areas to be eroded.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The statement “New office developments within Designated Employment areas (DEA) will be exempt from the sequential test in accordance with Policy SP20” should be removed</p> <p>The sentence “changes of use within the primary shopping area from Class E to other uses will be permitted where they do not result in a disproportionate concentration of non-Class E units that would be harmful to the vitality of that centre” should be changed to “changes of use within the primary shopping area from Class E to other uses will be permitted where they would not be harmful to the vitality of that centre”</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy SP 23 Transport

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bradfield College (Represented by Lucy White Planning)
Consultee Full Name	Julia Bond
Consultee Organisation	Bradfield College
Agent Full Name	Lucy White
Agent Organisation	
Comment ID	PS17
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	23/02/2023 10:12:59
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<ol style="list-style-type: none"> 1 Policy SP23 requires all developments that generate a transport impact comply with its policy criteria, including provision of improved opportunities for active travel and to facilitate sustainable travel particularly within, between and to main urban areas and rural service centres. 2 The policy sets a minimum residential threshold of 30 dwellings for applications to be accompanied by a Transport Statement or Assessment. However, the policy fails to specify a comparable threshold for non-residential development and therefore when the provisions of Policy SP23 would apply to new development. Accordingly, the policy is inconsistent with national planning policy, in particular paragraph 105 of the NPPF (2021). 3 In the absence of a minimum size threshold, the application of Policy SP23 would be open to interpretation by the LPA and Applicants, with potentially onerous requirements placed upon relatively modest developments. In the case of Bradfield College, a long-established co-educational college in the rural area of West Berkshire, Policy DM38 provides general policy support for its future development. However, it could prove unfeasible for the College to meet the criteria of Policy SP23 given its rural location in a settlement which lies outside the settlement hierarchy. Existing public transport services and active travel infrastructure is particularly limited and it is highly unlikely that development proposals at the College could support any meaningful enhancement of this infrastructure. 4 Strict application of this policy could thwart future proposals for growth at the College, despite its long-established and important contribution to the local economy and community infrastructure. 5 Policy thresholds for non-residential development and exceptional circumstances should be identified through the policy to clarify the applicability of the policy.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	No comment.
<p>4. Proposed Changes</p>	For the reasons set out above, policy thresholds for non-residential development and exceptional circumstances should be identified through the policy to clarify the applicability of the policy.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Pick, Anthony
<p>Consultee Full Name</p>	Mr

	Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS176
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	The emphasis in this section on a shift away from car travel should take more account of the movement towards more working from home. More importantly, the objective to reduce emissions will be achieved as much by the transition to electric vehicles, which will become progressively more cost-effective, as by abandonment of car usage. People will continue to wish to travel on short and longer journeys, and the convenience of private motoring will continue to be strongly felt. National policy strongly supports the trend to electric transmission.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	The LPR should therefore include a specific plan for the widespread availability of charging points on both private and public premises, existing as well as new. Judging solely from that part of Newbury where I live, bus travel has had only a limited effect. If it is to be better supported, a more strategic approach may be needed, with a wider range of routes. The LPR should not exclude new roads and road extensions, should those prove necessary.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hoddinott, Keith
Consultee Full Name	Keith Hoddinott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS486
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other	Letter

* SMS * Web * Unknown	
Response Date	02/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>It would appear than there is no long-term planning/vision as to where all this extra traffic will go. The recent proposals are only "tinkering at the edges", & will certainly not be effective in 13 years time in 2036.</p> <p>All the time, small developments are potentially blocking a possible eastern bypass - is this a hidden agenda strategy by the Council, or lack of foresight.</p> <p>I would respectfully suggest that URGENT thought be given at this time to start formulating a long term traffic management vision by starting with the Sandleford development, by insisting that the various developers and the Council, with central Government legislative & financial support, plan a dual carriageway link between the A339 roundabout at Newtown, along the northern side of the River Enborne, to link with the A343, with an improved access onto the A34. Co-ordinating with future DoT upgrading plans for the A34.</p> <p>On the eastern side of the Newbury/Thatcham conurbation, the bypass route be from Vodafone, north of Thatcham, Pipers Way, a new bridge over rail and river (as suggested in the NWN in october 2015 (H!!), through to Thornford road.</p>

	<p>The dangerous junction of Burys Bank Rd. out onto the hill, could be eliminated by a new link road across Crookham Common from near Partridge Gully, south of south of Thornford Park establishment, & then onto the old Thornford Rd at the top of the hill.</p> <p>I am not suggesting that this be done all at once, but the vision could be planned & implemented piecemeal as and when the opportunity arises with development applications.</p> <p>Further to my e-mail to you appertaining to "Highway Infrastructure VISION" & the Sandford development, dated 25th. November 2016, I note the Town Council has asked for observations on the future of the Town, and vision for the future.</p> <p>I therefore set out some observations regarding "parking standards on housing developments", and housing in general.</p> <p>The recent accident & road closure on the A34 south of the A339 connection (off junction 13 M4) demonstrated the vulnerability of the A339 through Newbury with the inevitable several hours of gridlock which ensued.</p> <p>Also, I have noticed the tail backs of vehicles on the Western Avenue as far back as the "Starting Gate" PH on a regular basis.</p> <p>The proximity of the Fire & Ambulance to this junction & the high traffic flows will have an increasing effect on time responses.</p> <p>It is important, in tandem with adoption of drainage infrastructures (see page 6), that highways are adopted on new developments. This facilitates Water Co's adoption procedures. These requirements should be a planning condition from outline stage, & carried forward with the appropriate legal agreements.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Reading Borough Council
<p>Consultee Full Name</p>	Mark Worringham
<p>Consultee Organisation</p>	Reading Borough Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS541

Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:35:57
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>Development close to the boundary between West Berkshire and Reading is likely to have implications for cross-boundary transport networks, and mitigation of these impacts may also need to take place on a cross-boundary basis. This requires some recognition within the policy.</p> <p>The plan as a whole lacks reference to the provision of new strategic transport infrastructure, in particular park and ride. Policy DM42 does talk about provision of transport infrastructure, but only in the context of securing improvements from development proposals, and is in any case not strategic in nature. The</p>

	Reading Borough Local Plan identifies the A4 and A329 corridors crossing the boundary to West Berkshire as being a priority for the provision of park and ride. This will realistically require provision of park and ride sites within West Berkshire. No specific sites have been identified, but there should nonetheless be some recognition of the importance of park and ride provision in the Reading area.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>It is suggested that the policy be amended as follows:</p> <p><i>“Development that generates a transport impact will be required to:</i></p> <ul style="list-style-type: none"> <i>• Minimise the impact of all forms of travel on the environment, in accordance with West Berkshire’s declared Climate Emergency and Environment Strategy;</i> <i>• Improve and promote opportunities for active travel;</i> <i>• Improve travel choice and facilitate sustainable travel particularly within, between and to main urban areas and rural service centres;</i> <i>• Demonstrate good access to key services and facilities;</i> <i>• Mitigate any adverse impact on local transport networks and the strategic road network, including where those impacts would be cross-boundary; and</i> <i>• Have regard to the West Berkshire Freight Route Network and availability of lorry parking where development will need the support of these facilities.”</i> <p>An addition should be made to the policy as follows:</p> <p><i>“Provision of park and ride on the A4 and A329 corridors linking to central Reading by enhanced public transport including bus priority measures will be supported and the Council will work with Reading Borough Council to identify deliverable proposals.”</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Society
Consultee Full Name	Mr David Peacock
Consultee Organisation	Newbury Society
Agent Full Name	
Agent Organisation	
Comment ID	PS776
Chapter / Policy / Appendix Number	Policy SP 23

Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>There is nothing in this Local Plan about the strategic road network. The view seems to be that the roads can time and time again take another 100 houses with just another tweak to the Robin Hood roundabout. In considering additional houses, and particularly when considering additional houses on sites involving more than 1,000 houses at a time, WBC needs to actively consider the consequences for the strategic road network.</p> <p>If several thousand new houses are to be built locally, would this require some new strategic roads to take traffic away from the Robin Hood roundabout (For example, a road from the A339 Swan Roundabout to the A343 Andover Road; a road from the Andover Road to the A4/A34 interchange west of Newbury; or a road from the A34/A339 interchange north of Newbury across to north Thatcham)? These</p>

	consequences would represent major changes for the area, and need to be considered alongside the proposals for housing development, not at some later stage.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Network Rail
Consultee Full Name	Ms Lisa Bullock
Consultee Organisation	Network Rail
Agent Full Name	
Agent Organisation	
Comment ID	PS1106
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p><i>c) Comments on other LPR Draft Policies (SP1, SP5, SP23, DM42 and supporting text)</i></p> <p>In non-site-specific terms the LPR policies in respect of spatial strategy, climate change and transport considerations also raise concerns in the context of the tests of soundness. The spatial strategy, climate change policy and transport policy should equally be consistent with National Policy requirements with regard to supporting and promoting sustainable transport.</p> <p>Across the LPR there are concerns that opportunities for policies to support sustainable development and specifically to encourage modal shift (to ensure the plan is positively prepared and consistent with national policy) have not been included. This again raises issues of soundness.</p> <p>The LPR as currently drafted is not consistent with NPPF requirements in terms of meeting the challenge of climate change (paragraphs 152-154). Neither is it consistent with wider national policy</p> <p><i>d) Consideration of Tests of Soundness</i></p> <p>By reference to Response Form Question 2, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:</p> <p>- The Plan is not positively prepared – it does not respond to identified need and it does not facilitate sustainable development.</p> <p>- The Plan is not justified – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the</p>

	<p>need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.</p> <p>- The Plan is not Consistent with National Policy – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>e) Changes required to make the West Berkshire Proposed Submission (Reg 19) Local Plan Sound</i></p> <p>By reference to Response Form Question 4 changes are identified as being required to make the West Berkshire Proposed Submission Local Plan sound. Specifically, the changes are required to ensure the plan is positively prepared, justified, and consistent with National Policy.</p> <p>To address the concerns raised with regard to soundness and specifically the failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes are sought in the context of spatial strategy, climate change and transport policies. Additionally, in site specific terms express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan 'sound' are as follows: (Changes required shown in red underlined/struck through). It is confirmed that the schedule of required changes has been jointly drafted and agreed between NR, Beftonforth and the Englefield Estate.</p> <p>Schedule of Required Changes</p> <p>(c) Policy SP23, Transport</p> <p>"Development that generates a transport impact will be required to:</p> <ul style="list-style-type: none"> - Minimise the impact of all forms of travel..... - Improve and promote opportunities for.... - Improve travel choice and facilitate sustainable.... - <u>Demonstrate that all options to secure modal shift from road to more sustainable transport means have been explored.</u> - Demonstrate good access....." <p>(d) Policy SP23 Supporting Text (new paragraph 7.50)</p> <p>"7.49 The Council has established a preferred Freight Route Network (FRN) for West Berkshire.....of their proposed development.</p> <p><u>7.50 Encouraging modal shift from road to more sustainable modes of transport in the freight sector is a key element in helping to meet local Climate Emergency target of carbon neutrality by 2030 and reducing HGV road miles. In the West Berkshire area opportunities in this context primarily comprise sustainable freight transportation by rail and expansion of or addition to existing facilities will be supported. Rail freight enables the efficient movement of goods to/from ports, quarries and distributions centres, helping reduce the need for HGVs on roads. On average rail freight trains emit around a quarter of the CO2 equivalent emissions of HGVs per tonne mile travelled. All development that generates significant HGV movements will be required to show that all practicable means have been explored to make use of rail as opposed to road for the transport of goods.</u></p> <p>7.507.51 Transport Assessments.....</p> <p>Early discussion with West Berkshire Council with regard to the representations made and suggested changes would be welcomed.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS844
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><i>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</i></p> <p>SP23 – TRANSPORT</p> <p>The latest Draft Local Transport Plan 2024-2039 has only just been released for Consultation on the 8th February and consultation completes on 22nd March 2023. Another late issued Document which gives Parish & Town Councils little time to incorporate feedback into their Section 19 Consultations.</p> <p>The Transport for Southeast SIP to 2050 provides little in the way of strategic improvements and the links to other major towns such as Basingstoke A339, A34 to Winchester & Oxford, A4 to Reading & Marlborough/Swindon are only scheduled for Safety upgrades. The A34 will not be upgraded to a Motorway and will continue to be a heavy freight route despite plans to move more freight to rail.</p> <p>And the increases in Distribution & Logistics employment space at Thattham Colthrop & Newbury Hambridge Lane will only lead to increases in HGVs and Vans along the A4 Corridor with inadequate radial routes out particularly to the South and West. There seems to be no attempt to look at a Distribution & Logistics Hub out near the M4 at Junction13. And the Distribution Hub being created at Membury has no Highways plan behind it and only has B roads to reach it with no improvements included in Transport Plans.</p> <p>And we need a bridge over the Railway at Thattham to facilitate commuting from Thattham to South Newbury, A339 to Basingstoke, and A34 to Winchester & Oxford without passing through Newbury.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Community Football Club (Represented by DPDS Consulting Group)
Consultee Full Name	Newbury Community Football Club
Consultee Organisation	Newbury Community Football Club
Agent Full Name	Les Durrant
Agent Organisation	DPDS Ltd
Comment ID	PS907
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The client supports the requirement for development that generates a transport impact to meet the criteria contained within this policy.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1325
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Object. The policy wording is not consistent with national policy or effective.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Proposed amendment 1.

	<p>Mitigate any <u>adverse significant</u> impact on local transport networks and the strategic road network</p> <p>The amendment is proposed to be consistent with paragraph 110 (d) of the NPPF (2021). It is recognised that some adverse impacts on the road network are likely as a result of development: the NPPF is clear that it is significant impacts which require mitigation.</p> <p>Proposed amendment 2.</p> <p>The policy refers to a document 'Highway Design Guidance for Residential Developments'. To allow for updates to local design guidance, it is necessary to amend the wording. The wording should be amended to</p> <p>"Development Proposals should <u>refer to the guidance</u> set out in the Council's Highway Design Guidance for Residential Developments <u>and other relevant national guidance</u>."</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	Yes, to explain the extent of variation from national policy, which makes the policy unsound.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1589
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	08/03/2023 16:17:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
Please give reasons for your answer	<p><i>*Late Response*</i></p> <p>Page 76</p> <p>Should there be a cross reference, linking to Policy DC35 Transport Infrastructure (Page 216) and how one affects the other?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1153
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Policy SP23 (Transport) states that development that generates a transport impact will be required to (amongst others): Minimise the impact of all forms of travel on the environment, in accordance with West Berkshire's declared Climate Emergency and Environment Strategy; and improve and promote opportunities for active travel.</p> <p>At paragraph 105 the NPPF states: <i>'[...] opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'</i></p> <p>As such, the NPPF recognises that both urban and rural areas face different challenges in terms of provision of transport solutions. Indeed, rural areas typically lack the offer in terms of public transport that is available in urban areas. Whilst we support the provision of a sustainable transport network, we consider that the requirements of this policy are not proportionate and fail to reflect the rural nature of much of West Berkshire District.</p> <p>SP23 as currently drafted has the potential to directly contradict and undermine Policy SP1 and the support this policy affords to the rural economy.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	<p>We therefore recommend that Policy SP23 is revised as detailed below to ensure soundness (additions shown <u>underlined</u> deletions shown with a strikethrough).</p> <p><u>Where appropriate</u>, development that generates a transport impact will be required to: [...]</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Vilna Walsh
Agent Organisation	Firstplan
Comment ID	PS762
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:46:00
Attached Files	Firstplan (Englefield Estate) Appendix 4.pdf Firstplan (Englefield Estate) Appendix 2.pdf Firstplan (Englefield Estate) Full Rep.pdf Firstplan (Englefield Estate) Appendix 5.pdf Firstplan (Englefield Estate) Appendix 3.pdf Firstplan (Englefield Estate) Appendix 1.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comment
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>For Full Representation see attachment.</i></p> <p><i>By reference to Response Form Question 2, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:</i></p> <ul style="list-style-type: none"> • <i>The Plan is not positively prepared – it does not respond to identified need and it does not facilitate sustainable development.</i> • <i>The Plan is not justified – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.</i> • <i>The Plan is not Consistent with National Policy – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); and considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>No comment</p>
<p>4. Proposed Changes</p>	<p><i><Proposed Changes shows as underlined for additions and strikethrough for deletions></i></p> <p>Policy SP23, Transport</p> <p>“Development that generates a transport impact will be required to:</p> <ul style="list-style-type: none"> • Minimise the impact of all forms of travel..... • Improve and promote opportunities for... • Improve travel choice and facilitate sustainable... • <u>Demonstrate that all options to secure modal shift from road to more sustainable transport means have been explored.</u> • Demonstrate good access....” <p>Policy SP23 Supporting Text (new paragraph 7.50)</p> <p>“7.49 The Council has established a preferred Freight Route Network (FRN) for West Berkshire.....of their proposed development.</p> <p><u>New Para Encouraging modal shift from road to more sustainable modes of transport in the freight sector is a key element in helping to meet local Climate Emergency target of carbon neutrality by 2030 and reducing HGV road miles. In the West Berkshire area opportunities in this context primarily comprise sustainable freight transportation by rail and expansion of or addition to existing facilities will be supported. Rail freight enables the efficient movement of goods to/from ports, quarries and distributions centres.</u></p>

	<p>helping reduce the need for HGVs on roads. On average rail freight trains emit around a quarter of the CO2 equivalent emissions of HGVs per tonne mile travelled. All development that generates significant HGV movements will be required to show that all practicable means have been explored to make use of rail as opposed to road for the transport of goods.</p> <p>7.50 Transport Assessments.....</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<i>Response made raises significant issues with regard to the soundness of the plan if the proposed amendments are not made.</i>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	National Highways
Consultee Full Name	Patrick Blake
Consultee Organisation	National Highways
Agent Full Name	
Agent Organisation	
Comment ID	PS1490
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	PS1490 National Highways original rep.pdf
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a</p>	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Local Plan Modelling Methodology</p> <p>The local plan modelling undertaken by WBC is described in the West Berkshire Strategic Transport Model (WBSTM) March 2022 Report. WBSTM is a highway assignment, public transport assignment and variable demand model developed in PTV-VISUM version 17.01.</p> <p>Comment: Use of a highway assignment element alone for the Local Plan modelling will most likely generate a 'worst case' for the SRN, the modelling of highway demand alone, however, requires justification.</p> <p>The following scenarios are included:</p> <ul style="list-style-type: none"> • 2037 Reference Case • 2037 Scenario 1R2 (S1R2) • 2037 Scenario 1R2 Mitigation 1 (S1R2 Mit1) • 2037 Scenario 1R2 Mitigation 2 (S1R2 Mit2) <p>NH notes the following. Local Plan impacts are assessed against a Reference Case which assumes no growth beyond the currently adopted Local Plan, this is acknowledged to be unrealistic because additional growth is inevitable. The large North East Thatcham Site (THA20) has been modelled with two separate mitigation scenarios, a demand management reduced car trips and then an assortment of highway junction changes. The Sandleford Park development is proposed to be pushed into the New Local Plan and not included as part of the 2037 reference Case. The M4 smart motorway and J10 improvements have been included in the modelling.</p> <p>NH identified in the response to the Regulation 18 Consultation Local Plan Review and Phase 1 Transport Assessment on 03/02/21 that M4 and A34 junctions within West Berkshire are predicted to be over capacity with predicted growth. These impacts are still evident in the latest reports reviewed. No highway mitigation has been proposed on the SRN. The Infrastructure Development Plan contains the M4 Smart Motorway Scheme between J3-J12 and the following statement:</p> <p>"Whilst it is hoped that there will be some improvements made to the A34 (by National Highways) in order that it can continue to carry out its important strategic function in a safe and efficient way, it is not currently anticipated that proposed development in West Berkshire in this plan period up to 2039 will cause the need for further improvements to the Strategic Road Network."</p> <p>Comment: Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document may need to be revisited and set out any SRN mitigation required to deliver the Local Plan development.</p>

The WBSTM Local Plan Forecasting report, March 2022, states that TRICS based trip rates have been agreed with West Berkshire and added separately to the traffic demand matrices.

Comment: These trip rates should be provided to National Highways for review. It should be considered that where flexible employment use (whether Class E, B2 / B8) is proposed that for the purpose of future year forecasting, and any subsequent individual planning applications that may arise from the Local Plan, there is an expectation that this would be modelled with a worst case scenario land use trip rate when determining potential impact on SRN.

A separate note produced by TPA Associates has been produced regarding THA20. The 2037 S1R2 MITIGATION 1 Scenario contains measures to reduce car trips to/from THA20, resulting in:

- Car demand to/from THA20 reduced by 5% for active travel measures (trips within 10km)
- Car demand to/from THA20 reduced by 20% for bus proposals (to/from Thatcham town centre and rail station).

Distribution of trips and flow by junction arm from/to the SRN for all of the future cumulative allocated sites in each scenario should be provided to NH.

Substantive Issue: Some errors have been identified in specific tables of the Local Plan Forecasting Report, March 2022 which need correcting for NH to understand the potential SRN impact:

- Table 2-19 (Final highway assignment matrices – 2037 S1R2) – the Total Vehicles at the base of table are incorrect
- Table 2-24 (Final highway assignment matrices – 2037 S1R2 Mit1) – the Total Vehicles at the base of table are incorrect
- Table 2-24 (Final highway assignment matrices – 2037 S1R2 Mit1) is the same as Table 2-19 (Final highway assignment matrices – 2037 S1R2)

Local Plan Modelling Results

Reference Case flows increase across the majority of the network compared with the base year:

- increases are greatest on strategic routes like the M4 and in the Newbury and Thatcham area where the majority of new committed developments are located
- some routes in the Newbury area experience flow reductions due to congestion at a number of junctions within Newbury and on the A339, there is notable reassignment of strategic traffic from local routes in Newbury town centre and the A339 to other alternative strategic routes like the A34

S1R2 traffic flows increase compared to the Reference Case:

- increases are on major roads such as the A34, the A339, the A4, Bury's Bank Road/Crookham Hill and the Broad Lane
- there is a consistent re-assignment of traffic in all Local Plan scenarios (compared to the Reference Case) due to town centre congestion particularly
- local roads are generally associated with small flow increase across all Local Plan scenarios
- increased flows through the corridor, as well as THA20 site traffic directly accessing the A4, are likely to cause traffic displacement onto wider routes away from the A4, through local villages like Upper Bucklebury
- demand mitigation (modelled in S1R2 Mit1) could relieve the A4 – however, highway mitigation (modelled in S1R2 Mit2) may be necessary to alleviate impacts of local rerouting around the congested A4

Substantive Issue: Flow differences only appear to be provided for S1R2 Mit2, the plots show reductions in flow on the A34 and M4, clarity is needed as to why, is Local Road network (LRN) congestion restricting flow to the SRN. NH request the flow difference data for S1R2 Mit1 and S1R2.

Summary and Next Steps

JSJV have undertaken a review of the available transport evidence base documents associated with the Regulation 19 Consultation for WBC on behalf National Highways.

JSJV have highlighted a number of areas where further information is requested, including model justification, trip rates, trip distribution, assignment matrix table errors and flow impact plot data.

JSJV request that WBC respond to the points raised in this TN before a meeting is arranged with NH and JSJV representatives to discuss the transport evidence base for the WBC Local Plan.

Given the interdependency of the SRN and the LRN, following the on-going review work of development impacts, once these are understood and agreed by JSJV, NH and WBC, any mitigation package must be in its final form and, where necessary, appropriately tested to quantify impacts on the SRN.

<original response colour coded for severity of issue raised - original rep attached for reference>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincentis Lane (Represented by TOWN)
Consultee Full Name	Pincentis Lane
Consultee Organisation	Pincentis Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1362
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincentis Lane) Full Rep.pdf TOWN (Pincentis Lane) App 9 Transport Response.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The site Promoters have commissioned Pell Frischmann to produce an analysis of the transport evidence for the LPR; the published Transport Assessment. This study is attached as Appendix 9.</p> <p>The Pell Frischmann analysis states the following:</p> <p><i>2.5.1 It is concluded that none of the strategic TA work undertaken by WBC as part of its Local Plan Review justifies the current spatial approach of continuing to load most residential development in the west of the District, e.g. around Newbury and Thatcham. It is argued that there is insufficient justification for the uneven spatial distribution of sites allocated for residential development, particularly given the capacity in the eastern part of the District and the opportunities to access to a wide range of services and infrastructure both within West Berkshire and within Reading, by sustainable transport modes.</i></p> <p><i>2.5.2 Consequently, it is considered that the spatial approach is not justified nor consistent with the NPPF. As such, it is considered that the plan is unsound from a transport and highways perspective. Moreover, it is considered that there is no good reason not to allocate more residential development in the east of the District, as from a transport and highways perspective the evidence base justifies it.</i></p> <p>In short, it can be seen that the proposed spatial pattern of development in the R19 draft LPR would reinforce unsustainable patterns of transport and travel. It would also focus more traffic on the already overloaded junction 13 whilst capacity exists at junction 12.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Full Rep • Appendix 9 - Pell Frischmann: Transport Response
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1277
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The most recent transport modelling, according to the Phase 1 Transport Assessment Dec 2020, was done based on models run before the pandemic caused major changes in travel and transport patterns. It was also only projecting forwards to 2037, whereas the Plan period has been extended to 2039. Nor does it take into account the most recent HELAA in which new sites came forward and other sites which had previously been modelled for were removed.</p> <p>Therefore the modelling needs to be re-run using the best national post-pandemic traffic data and the latest set of sites included in this draft for allocation of development, otherwise the LPA will be unable to defend those allocations during Examination and may also be unable to justify transport projects it wishes to include in the IDP and CIL/S106 funding derived from developments for their contributions to transport infrastructure.</p> <p>The lack of updated traffic modelling could also impact on Air Quality assessments.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>The traffic modelling needs to be redone; there are no changes to be proposed to the Plan until this happens. The change necessary is for the Plan process to be paused until the traffic modelling has been redone.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We are unsure at this stage. If the emerging LTP involves new traffic modelling then it may have been done before the Examination of this Plan is begun.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1437
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	PS1437 Cllr Alan Macro (Transport Modelling).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The West Berkshire Strategic Transport Model in the Evidence Base has not been updated for the following:</p> <ul style="list-style-type: none"> • End date for LPR revised from 2037 to 2039 • Additional housing sites proposed for Theale, totalling 100 units • Removal of housing sites proposed at Reg19 stage because of imposition of AWE DEPZs • Removal of proposed housing site at Pincents Hill, Tilehurst • Removal of proposed office employment site adjacent to M4 J12 • Proposed policy to allow office development on Designated Employment Areas, that would attract much higher private car traffic <p><i>Attachment: specific comments on Transport Model</i></p> <p>Modelling mitigations are limited to vicinity of NE Thatcham strategic site and do not take into account the housing allocations proposed around Newbury and Theale.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The transport model should be modified to address the issues identified in (2) above and re-run. This policy then needs to be reviewed in the light of the model output and identified mitigations</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Thatcham Town Council</p>
<p>Consultee Full Name</p>	<p>Ms Mel Taylor</p>
<p>Consultee Organisation</p>	<p>Thatcham Town Council</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1861</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 23</p>

Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	PS1708&PS1861 Thatcham Town Council _Transport Assessment webpage.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>The Local Plan Review web page on the West Berkshire Council website for the evidence base of transport assessments states:</p> <p>“Transport is one of the key considerations to be assessed as part of the Local Plan Review (LPR) process. A Strategic Transport Assessment (TA) is being undertaken to run concurrently with the LPR process to determine the potential impacts of the emerging draft LPR and to investigate possible mitigation measures to address such impacts.”</p> <p><i>(https://westberks.gov.uk/transport-assessments retrieved 26/02/2023 - copied below < see attached document PS1708 Thatcham Town Council_ Transport Assessment webpage>)</i></p> <p>Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 states:</p> <p>“(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.</p> <p>(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme</p> <p>If the document “to determine the potential impacts of the emerging draft LPR” is “being undertaken to run concurrently with the LPR process”, then the evidence for the SA/SEA cannot have been available when the Sustainability Appraisal: Appendix 5 SA/SEA of Strategic Policies was prepared.</p> <p>The SA/SEA Summary for Transport Policy in Table 59 Appendix 5 of the SA/SEA states:</p> <p>“The policy is likely to have a positive impact on all sustainability objectives as it seeks to promote and encourage the use of sustainable modes of travel, such as walking, cycling and the use of public transport over car use. A number of indirectly positive environmental impacts have also been identified, which relate to benefits that a reduction in car use would have that are not directly related to the policy. No negative impacts have been identified as a result of this policy.”</p> <p>It describes the ‘Overall effect’ as “Positive”. There is no basis for this conclusion, as the Strategic Transport Assessment has not yet been carried out.</p> <p>The proposal for approximately 1,500 homes at North East Thatcham will increase the overall level of traffic in and around Thatcham. The West Berkshire Strategic Transport Model – Local Plan Forecasting Report concludes (paragraphs 5.4.1 and 5.4.2):</p> <p>“5.4.1 The analysis set out in this assessment indicates where small impacts may still occur as a result of Local Plan growth and the proposed mitigation; however due to network constraints it will not necessarily be feasible to mitigate all such impacts.</p> <p>5.4.2. It is important to note, however, that the Local Plan impacts have been assessed against a Reference Case which assumes no growth (beyond the current adopted Local Plan) in housing and employment within West Berkshire, which is an unrealistic situation; there will inevitably be growth across the district, and the district is committed to deliver that growth.”</p> <p>Regulation 12 requires the EA/SEA to assess the plan as a whole, not policy-by-policy. It is therefore clear that the impact of SP23 taken with SP17 in relation to transport is negative, even without taking into account the growth in housing and employment within West Berkshire that is inherent to the draft Local Plan.</p> <p>The Sustainability Appraisal of transport therefore does not comply with the requirement of Paragraph 12(2)(b) of The Environmental Assessment of Plans and Programmes Regulations 2004.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	As the sustainability appraisal is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	The SA/SEA needs to be reviewed in relation to transport after completion of the Strategic Transport Analysis.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>Thattham Town Council is the principal representative body of the community of Thattham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed</p>

	through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Royal Borough of Windsor & Maidenhead
Consultee Full Name	Royal Borough Windsor & Maidenhead
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1539
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The Council supports the objective to mitigate the impact of planned growth on the strategic road network and to promote low emission transport choices.</p> <p>In conclusion, the Royal Borough of Windsor and Maidenhead has no concerns or objections to the Regulation 19 version of the Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beftonforth Ltd (Represented by PSP Consulting)
Consultee Full Name	Beftonforth Ltd
Consultee Organisation	
Agent Full Name	Patrick Gurner
Agent Organisation	PSPconsulting
Comment ID	PS1513
Chapter / Policy / Appendix Number	Policy SP 23
Chapter / Policy / Appendix Title	Transport
Order	77
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:01:00
Attached Files	PSPconsulting on behalf of Beftonforth Ltd REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	All as set out in detail in the Local Plan Review Documentation
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p><i>[See attached document for full accompanying statement - PSPconsulting obo Bectonforth Ltd REDACTED]</i></p> <p>Please refer to Section 3 and Section 4 of the accompanying statement prepared by PSP on behalf of Bectonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 3 - POLICY REVIEW INCLUDING DRAFT POLICIES DM43 AND DM42</p> <p>National Planning Policy Framework (NPPF July 2021)</p> <p>The National Planning Policy Framework (NPPF) has a presumption in favour of sustainable development at its heart. Of particular relevance to the potential for growth in rail use at the Theale Railhead, Bectonforth have highlighted below particular elements of National Policy which support the Government’s intention to increase the use of rail freight to assist in achieving national decarbonisation targets and deliver net-zero.</p> <ul style="list-style-type: none"> • At NPPF paragraph 106(c), planning policies should: “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;” • At NPPF paragraph 106(e) planning policies are also required to: “provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy...” • Footnote 44 on page 31 confirms that: “Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight,” [our underlining]. • NPPF paragraph 83 is clear that in the context of building a strong, competitive economy: “Planning policies and decisions should recognise and address the specific locational requirement of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” [our underlining]. • At NPPF paragraph 152 In the context of meeting the challenge of climate change, the planning system should help to: “shape places in ways that contribute to radical reductions in greenhouse gas emissions...”. • And NPPF paragraph 153 requires that: “Plans should take a proactive approach to mitigating and adapting to climate change...”. • Similarly, NPPF paragraph 154 confirms that new development should be planned in ways that: “can help reduce greenhouse gas emissions...”. <p>The consultation on the December 2022 proposed updates to the NPPF, which run to March 2023, do not propose any material change to the NPPF paragraphs quoted above.</p> <p>The Planning Practice Guidance (PPG) on Climate Change gives advice at paragraph 003 on “How the challenges of climate change can be addressed through the Local Plan”. The Guidance states that “there are many opportunities to integrate climate change mitigation and adaptation objectives into the Local Plan. Sustainability appraisal can be used to help shape appropriate strategies in line with the statutory duty on climate change and ambition in the Climate Change Act 2008.</p> <p>Examples of mitigating climate change by reducing emissions:</p> <ul style="list-style-type: none"> • Reducing the need to travel and providing for sustainable transport;” <p>Draft Policies SP1 ‘Spatial Strategy’; SP5 ‘Responding to Climate Change; and SP23 ‘Transport’</p> <p>Consistent with the above National Policy advice, Bectonforth consider that the following Draft Local Plan Policies should be amended as below:</p> <ul style="list-style-type: none"> • Draft Policy SP1 ‘Spatial Strategy’ should be extended to include opportunities to increase and expand the provision for the movement of freight by sustainable means. • Draft Policy SP5 ‘Responding to Climate Change’ listed criteria should also include an item to demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured. • Draft Policy SP23 ‘Transport’ should similarly include a requirement for development that generates a transport impact to demonstrate that all options to secure modal shift from road to more sustainable transport means have been explored. • The Supporting Text to Draft Policy SP23 should include a new paragraph encouraging modal shift for the movement of freight from road to rail.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p>	<p>Yes</p>

* No	
Please give reasons for your answer	All as set out in detail in the Local Plan Review Documentation
4. Proposed Changes	<p>Please refer to Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 4 - REQUIRED CHANGES TO MAKE THE PLAN SOUND</p> <p>With reference to Response Form Question 2, in the absence of any wording in the Regulation 19 Submission Draft Local Plan expressly supporting the growth of the Theale Railhead, and with wider omissions with respect to the Spatial Strategy, Climate Change Policy and Transport Policies, the Submission Draft Local Plan is not considered to meet the tests of Soundness for the reasons identified above and summarised below:</p> <p>The Submission Draft Local Plan is not positively prepared since it does not respond to identified need and it does not facilitate sustainable development in accordance with National and Regional Policy.</p> <p>The Submission Draft Local Plan is not justified since it fails to deliver an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives.</p> <p>There is no clear audit trail as to why this approach has been adopted and changed from the adopted Development Plan and from earlier stages of the current Local Plan Review. The Sustainability Appraisal fails to consider the increased use of rail freight consistent with National and Local Policy, when the evidence points to the need to support the growth in rail freight provision. The Sound approach and reasonable alternative would be to provide supporting text which supports the growth of rail freight at Theale and to have this expressed within the Policy itself.</p> <p>The Submission Draft Local Plan is not Consistent with National Policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site-specific considerations of the Theale Rail-Road Transfer Site under Policy DM43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</p> <p>Changes required to make the West Berkshire Regulation 19 Proposed Submission Draft Local Plan Sound</p> <p>With reference to Response Form Question 4 changes have been identified below which are considered necessary to make the Submission Draft Local Plan Sound. The changes are required to ensure that the Submission Draft Local Plan is positively prepared, justified, and consistent with National Policy.</p> <p>To address the concerns raised in these representations with regard to Soundness, and specifically the failure of the Submission Draft Local Plan to appropriately identify and support modal shift in the context of the movement of freight, changes are sought below with respect to spatial strategy, climate change and transport policies. Additionally, in site specific terms, express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan ‘Sound’ are shown below in red underline or strike through.</p> <p>It is confirmed that the schedule of required changes set out below, has been jointly drafted and agreed between Network Rail, Beftonforth and the Englefield Estate.</p> <p>(c) Policy SP23, Transport</p> <p>“Development that generates a transport impact will be required to:</p> <ul style="list-style-type: none"> • Minimise the impact of all forms of travel..... • Improve and promote opportunities for.... • Improve travel choice and facilitate sustainable.... • <u>Demonstrate that all options to secure modal shift from road to more sustainable transport means have been explored.</u> • Demonstrate good access....” <p>(d) Policy SP23 Supporting Text (new paragraph 7.50)</p> <p>“7.49 The Council has established a preferred Freight Route Network (FRN) for West Berkshire.....of their proposed development.</p> <p><u>7.50 Encouraging modal shift from road to more sustainable modes of transport in the freight sector is a key element in helping to meet local Climate Emergency target of carbon neutrality by 2030 and reducing HGV road miles. In the West Berkshire area opportunities in this context primarily comprise sustainable freight transportation by rail and expansion of or addition to existing facilities will be supported. Rail freight enables the efficient movement of goods to/from ports, quarries and distributions centres, helping reduce the need for HGVs on roads. On average rail freight trains emit around a quarter of the CO2 equivalent emissions of HGVs per tonne mile travelled. All development that generates significant HGV movements will be required to show that all practicable means have been explored to make use of rail as opposed to road for the transport of goods.</u></p> <p><u>7.507.51</u> Transport Assessments.....”</p>

<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain in detail to the Inspector, the importance of the Local Plan Review including the opportunity for the growth of rail freight at the Theale Railhead.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Policy SP 24 Infrastructure Requirements and Delivery

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS179
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The outlines of an infrastructure plan should be included in the LPR and not relegated to an Infrastructure Delivery Plan. Schools, colleges, GP surgeries, and hospitals are as important to the development and wellbeing of the district as housing, landscape, heritage, business, and transport.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>There should be a specific reference to primary, secondary, and tertiary education and the means to ensure their delivery</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Hoddinott, Keith</p>
<p>Consultee Full Name</p>	<p>Keith Hoddinott</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS489</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy SP 24</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Infrastructure Requirements and Delivery</p>
<p>Order</p>	<p>79</p>
<p>Submission Type</p> <p>* E-Mail * Letter</p>	<p>Letter</p>

* Other * SMS * Web * Unknown	
Response Date	02/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p><u>Drainage Infrastructures</u></p> <p>Schedules (Sections) 3 (SUDS) & 42 (Sewers). Flood & Water Management Act 2010.</p> <p>You will be aware from past correspondence of my efforts to get the Government to implement the above legislation. I have now exhausted all the direct contact with departments, agencies & organisations to pressure DEFRA to ABIDE by</p> <p>Government original intentions, & the Parliamentary Scrutiny Cilee's recommendations (2017), & the Food & Rural Affairs dee. (HC1 70— Sept. 2020) conclusions; & show some "Duty of Care" to home owners. The LGA will not accept my representations as an individual, but only from one of its local authority members.</p> <p>Therefore, I am formally requesting that West Berks Council makes representations to the LGA to pressure Government to implement this legislation immediately. This will enable the mandatory adoption of SUDS &</p> <p>Sewers, & close the loophole in planning procedures, which large developers are using to the legal, financial & environmental detriment of homeowners.</p>

Bracknell-Forest Council have gone some way in their policy towards SUDS provisions on new developments. Therefore why can not WBC do likewise. G.Eaton (Dept.for Levelling-up, Hsg. &Communities) has said in correspondence that LA's & Water Co.'s should be more robust at the early planning stages to require infrastructures to be adopted.

This is not only a serious National issue, but of particular concern to the Thatcham Flood Forum. They are concerned that unregulated design, construction & future maintenance of private SUDS & sewer infrastructures on proposed developments north of the town on the rising escarpments up to Cold Ash & Bucklebury could in the future compromise & prejudice the integrity of the recent Flood Alleviation schemes being undertaken by WBC.

I have spoken informally to some Thatcham & Newbury Town Councillors, who are sympathetic to the implementation of this legislation.

There are many nuances & unintended legal, financial & environmental consequences to the delays in the Government's inaction on these issues, which have been outlined in previous correspondence. Therefore, I would be willing to discuss these issues with yourself & members.

Recent correspondence from the Dept. for Levelling Up, Housing & Communities suggest that Councils should be expected to be more robust in their policies for the provision of infrastructures including flood risk management & sewerage infrastructures.

An opportunity of the SUDS infrastructures is that they could be used as an integrated part of open space areas, developed to provide planting & biodiversity. Hence the need for such areas to be adopted & maintained by the Council.

Private Estate roads & drainage infrastructures (trends by developers).

I note the trend towards private (un-adopted roads) streets (Racecourse development, & the Taylor/Wimpey site adjacent to Vodafone Centre).

Clearly the developers are content with this, as they can build to a lower standard of design and construction. However, what happens in the future when the roads have deteriorated, and the "management" arrangement has financially collapsed. The cost will fall on unsuspecting house owners, who may say "why didn't the Council ensure adoption when the houses were constructed".

Land prices should reflect the infrastructure requirements and recovery (ex. Industrial sites) costs.

I suspect that some developers are manipulating land prices, in order to avoid the infrastructure & social/affordable housing requirements of the Council.

Brown field sites are not necessarily more expensive to build on. Land hoarding by developers should be curtailed by measures to encourage swift starts once planning permission is granted. Failure to do so should be legislated so that Council's can say, purchase from the developer at the price he paid before planning permission granted.

Why not allow Councils to purchase land. Mrs. Thatcher sold Council Houses, and it is perhaps ironical that home ownership is now lower than at her time. One reason being that replacement of Council Houses was not permitted. Then Councils were "persuaded" to sell estates to newly formed Housing Associations. Her hidden agenda (as with selling off the public utilities) was to reduce the PSBR government loans. So why is the Conservative Government now proposing to bring Housing Association loans within the PSBR?

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS616
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 25. SP24. The entire text is very vague and needs to be made clearer. What is meant by 'adequate'? This needs more detail. The entire section is unrealistic and needs a lot more detail.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bridle, David
Consultee Full Name	David Bridle
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS553
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type	Web

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	02/03/2023 21:18:29
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The answer is I dont know if legally compliant as there is no option for 'don't know'. This is for an inspector to determine.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	In terms of nrastructure which is my comment re SP24, there is no detail to improve safety on residential roads containing Primary Schools such as Park Lane which would be affected adversely by significnat additional traffic movements. The Thatcham Park School has children classes from 2 YRS old and the road is already dangerous. The police fails to risk assess and provide specific mitigation policies for safer streets for Primary school areas/ zones. Sustainability includes safer development and this development creates additional risks without appropriate transparent mitigation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS542
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:36:29
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	Yes

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	RBC welcomes this policy, in particular the recognition that <i>"The Council will collaborate with other strategic policy making authorities to ensure that administrative boundaries do not restrict the delivery of the most appropriate infrastructure response."</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS845
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point. SP24 – INFRASTRUCTURE REQUIREMENTS & DELIVERY An incomplete document with no funding for Flood Alleviation Schemes for Newbury Clayhill and schemes to the North. No details on the upgrades that will be required to already failing drainage on the London Road Estates DEA and the area between the Southern banks of the River Lambourn and the A4 which nearly 200 properties at High RoFSW and sewage pollution with poo in back gardens. The figures included for 8 Football pitches at £1m each are aspirational as the first one to be delivered will require at least £3.7m of Capital Funding.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Berkshire Oxfordshire Bucks Integrated Care Board
Consultee Full Name	BOB Integrated Care Board
Consultee Organisation	BOB Integrated Care Board
Agent Full Name	Helen Clark
Agent Organisation	
Comment ID	PS1137

Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 17:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The ICB would welcome an opportunity to discuss being a recipient of Community Infrastructure Levy (CIL) contributions towards Primary Care developments with West Berks Council. Finally, the ICB would welcome an opportunity, as part of the Local Plan review, to revise the IDP so that a better understanding of up-to-date primary care development costs can be incorporated into subsequent section 106 Agreements, particularly if Section 106 and CIL developer contributions are replaced by the proposed "Infrastructure Levy" as part of National Government's levelling up Agenda.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1717
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>To improve the effectiveness of the policy and to avoid potential unnecessary delays in the planning process, reference should be made within the policy to the need for any contributions required to the delivery of relevant infrastructure to be consistent with the tests at Section 122 of the Community Infrastructure Levy Regulations (2010) (as amended).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>To improve the effectiveness of the policy and to avoid potential unnecessary delays in the planning process, reference should be made within the policy to the need for any contributions required to the delivery of relevant infrastructure to be consistent with the tests at Section 122 of the Community Infrastructure Levy Regulations (2010) (as amended).</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1525
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Croudace Homes Combined Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>[For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>Infrastructure Delivery Plan (January 2023)</p> <p>The Infrastructure Delivery Plan sets out specific strategic infrastructure requirements for West Berkshire. It outlines that in relation to North East Thatcham, a package of infrastructure improvements are to be delivered, including a £1.125m Travel Plan and £22m highways package – all to be funded by developer contributions, and presumably secured through a S106 agreement.</p> <p>Croudace considers this is likely to lead to increased delays in delivery at North East Thatcham and could potentially threaten the viability of development, which may result in lower levels of contributions ultimately being secured. Given the doubts expressed regarding the housing trajectory, Croudace calls on the Council to identify other, less constrained sites without significant infrastructure requirements to come forward to help plug the gap.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1697
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Infrastructure Delivery Plan (IDP) is fundamental to the successful delivery of the objectives of the Local Plan – in particular ensuring that provision of infrastructure is aligned with growth in housing. In the Local Plan, the IDP is defined in Policy SP24.</p> <p>Other representations by the Town Council have highlighted that some key items of infrastructure required for the North East Thatcham development in SP17 are missing from the IDP update of January 2023. Major current infrastructure projects such as the redevelopment of the Newbury Lido are also missing, while some of the items in the IDP are not infrastructure projects at all - for example, the last two items on 'Woodlands and Hedgerows' and 'Rights of Way and Bridleways', which appear to be part of a CIL charging schedule.</p> <p>The first 57 out of the 69 pages of the January 2023 IDP are completely superfluous to its purpose as described in paragraph 7.55 of the draft Local Plan – and most if that is cut-and-paste from the local plan.</p> <p>Paragraph 11 of NPPF states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that all plans should promote a sustainable pattern of development that seeks to ... align growth and infrastructure...”</p> <p>It is clear that the current Policy SP24 does not achieve the alignment of growth and infrastructure, because essential items of infrastructure in strategic policies for housing are not included in the IDP for the Regulation 19 Consultation.</p> <p>Paragraph 20 of NPPF states: Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for ... infrastructure for transport, telecommunications, security, waste management, water supply, wastewater [and] flood risk; community facilities (such as health, education and cultural infrastructure);</p> <p>Strategic Policy SP24 aims to deliver the sufficient provision of infrastructure through the IDP, but clearly does not at present achieve this.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>Policy SP24 should define the responsibility within the Council for the maintenance of the IDP (including ensuring that it stays aligned with the pace of housing development) and the frequency with which it is reviewed.</p> <p>We suggest that the IDP would be easier to maintain and update if it is a spreadsheet (as is recommended by the Local Government Association and implemented by many Local Authorities). This would inherently remove the superfluous introduction.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East</p>

	<p>Thatcham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	NHS Resolution
Consultee Full Name	NHS Property Services
Consultee Organisation	NHS Property Services
Agent Full Name	
Agent Organisation	
Comment ID	PS1585
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 17:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>*Late Response*</p> <p>The NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. A vital part of this is ensuring the NHS continues to receive a commensurate share of S106 and Community Infrastructure Levy (CIL) developer contributions to mitigate the impacts of growth and help deliver transformation plans.</p> <p>Paragraph 34 of The NPPF is clear that 'Plans should set out the contributions expected from development. This should include setting out... infrastructure (such as that needed for... health)'</p> <p>The significant cumulative impacts of residential developments on healthcare requirements in the area should be recognised and, given their strategic importance, health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects. It is imperative that planning policies are positively prepared, in recognition of their statutory duty to help finance improved healthcare services and facilities through effective estate management.</p> <p>We request that when setting planning obligation policies, the Council seek to address strategic as well as local priorities in planning obligations and engage the NHS in the process as early as possible.</p> <p>Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. In those cases, and where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services in that particular location, a more flexible approach for public service providers should be applied when considering a change of use to non-community uses.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1278
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? -	Yes

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>National policy on funding of infrastructure is currently unclear. Whilst the Liberal Democrat Party has always strongly supported using the uplift in land value from the granting of planning consent (and also from allocating land through Local Plans to a higher value land use) to fund essential infrastructure required by new developments, we also support the use of the higher 'spill-over' land value resulting from investments in infrastructure, because land values are affected (generally in an upward direction) over a wide area by improvements to infrastructure.</p> <p>None of the post-WWII methods of capturing land value for public benefit have worked adequately and it is as yet unclear whether the Levelling Up & Regeneration Bill will result in a system which is any better than CIL. It is unclear what national policy currently is and therefore local policy SP24 cannot be deemed consistent with it.</p> <p>Therefore, we believe this policy is unsound until and unless the Government's proposals are clearer.</p> <p>This is one reason why we would wish the Plan making process to pause. If there is no change to the system, then the current CIL Charging Schedule needs urgent updating.</p> <p>Appendix 1 to the IDP is seriously lacking in evidence of anything approaching a realistic cost estimate for the infrastructure projects listed as necessary for developments set out in the LDP. It is totally ineffective as it stands both for this reason and because of the lack of clarity on government policy and the effect this is having on investor confidence.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	Completion of the IDP is needed. The Plan process should be paused until the IDP is at a more advanced stage with all known projects given at least an approximate realistic estimated cost.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>When the IDP has been fleshed out, we will wish to examine and probably comment on it, with the ability to question and be questioned on comments made.</p> <p>Meanwhile I have personally submitted an application to be involved in the DLUHC studies of Land Value Capture and Land Auctions, which form part of the Levelling Up Bill. I have previously been involved in research for Government on this subject and it may be appropriate to speak on this at the time of the Public Examination of this Plan.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1427
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	The Policy includes a link to the Infrastructure Delivery Plan (IDP). The IDP, under 'Health Centres/Improvements to address capacity and access' states that 'no costs identified at this stage'. We are content with the work that has gone into identifying other infrastructure requirements that are required, but feel that this specific topic must be addressed as a matter of urgency.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd

Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1626
Chapter / Policy / Appendix Number	Policy SP 24
Chapter / Policy / Appendix Title	Infrastructure Requirements and Delivery
Order	79
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
<p>4. Proposed Changes</p>	<p>Policy SP24: Infrastructure and Delivery</p> <p>To improve the effectiveness of the policy and to avoid potential unnecessary delays in the planning process, reference should be made within the policy to the need for any contributions required to the delivery of relevant infrastructure to be consistent with the tests at Section 122 of the Community Infrastructure Levy Regulations (2010) (as amended).</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review

- * Yes
- * No

Yes

8 Non strategic site allocations: our place based approach

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1169
Chapter / Policy / Appendix Number	8
Chapter / Policy / Appendix Title	Non strategic site allocations: our place based approach
Order	80
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? -	Yes

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The following site allocation policies refer to the need for desk-based assessment and, if necessary, field evaluation; however, the language used is not consistent.</p> <p>The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness:</p> <ul style="list-style-type: none"> • RSA1: Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1) • RSA2: Land at Bath Road, Speen, Newbury (Site Ref: HSA 2) • RSA5: Land at Lower Way, Thatcham (Site Ref: THA025) • RSA10: Whitehart Meadow, Theale (Site Ref THE1) • RSA11: Former Theale Sewage Treatment Works, Theale (Site Ref THE7) • RSA12: Land adjoining Pondhouse Farm, Clayhill Road (Site Ref: HSA15) • RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4) • RSA14: Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19) • RSA15: Land at Newbury Road, Lambourn (Site Ref: HSA 20) <ul style="list-style-type: none"> • RSA17: Land at Chieveley Glebe, Chieveley (Site Ref: CHI23). This site does not currently require a DBA and field evaluation, if necessary, but Until this is added, we regard this allocation to be unsound, as detailed in Appendix B. • RSA18: Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22) • RSA19: Land west of Spring Meadows, Great Shefford (Site Ref: GS1)(Modified if/as appropriate) • RSA20: Land off Charlotte Close, Hermitage (Site Ref: HSA 24) • RSA21: Land south east of the Old Farmhouse, Hermitage (Site Ref HSA 25) • RSA22: Land adjacent Station Road, Hermitage. This site does not currently require a DBA and field evaluation, if necessary, but should. Until this is added, we regard this allocation to be unsound, as detailed in Appendix B (The wording of a requirement for heritage impact assessment also needs to be amended in this policy, see Appendix B) • ESA1: Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5) • ESA5: Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10) • ESA6 Policy ESA6 Land adjacent to Padworth IWMF, (Site Ref: PAD4) <p>Our detailed comments on the plan's policy framework are included in Appendix A and on the proposed allocations in Appendix B. Also we provide some further comments on the Sustainability Appraisal in Appendix C.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>For all sites listed in this representation, while we support the policy requirement for desk- based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.</p> <p>Linked with this matter:</p> <ol style="list-style-type: none"> 1 for ESA1, the phrasing implies that field evaluation will definitely be required; is that the case? 2 for ESA6, wording changes are needed to ensure the criterion is clear i.e. is the DBA required and then field evaluation, if necessary. We suspect this is simply a typo, so hopefully an easy
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	<p>Yes</p>

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy RSA 1 Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS984
Chapter / Policy / Appendix Number	Policy RSA 1
Chapter / Policy / Appendix Title	Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)
Order	82
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Feltham Properties (Represented by Pro Vision)
Consultee Full Name	Sean Bates
Consultee Organisation	Feltham Properties
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS752
Chapter / Policy / Appendix Number	Policy RSA 1
Chapter / Policy / Appendix Title	Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)
Order	82
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:14:00
Attached Files	Policy RSA1 Land north of Newbury College.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Feltham Properties Ltd has a controlling interest in this site and has previously had outline planning permission and approved reserved matters for a development of sixteen dwellings. This site was originally allocated in the Housing Sites and Allocation DPD (2017) (HSADPD). As development has not commenced as yet, it is appropriate that the allocation is rolled forward into the Local Plan Review (LPR).</p> <p>However, this area adjacent to Newbury College has evolved since the drafting and adoption of the HSADPD.</p> <p>Outline permission has been granted for the Sandleford Park major development (allocated in the Core Strategy in 2012; Policy C3) immediately to the west and south-west of this site. The boundaries of the approved scheme (application 20/01238/OUTMAJ) have varied in some respects with the allocation boundary, including in the area immediately adjacent to the RSA1 site.</p> <p>The following extracts from the West Berkshire Online Mapping compared to the extract from the approved master plan illustrate this point. The Online mapping shows the Core Strategy allocation running the full length of Monks Lane to include land immediately north of the RSA1 allocation. The approved scheme does not include this land immediately north of RSA1. This is due to landownership matters.</p> <p>The implications are that there is a left over area of land, entirely within the settlement boundary of Newbury, that is neither part of the Sandleford master plan nor the RSA1 allocation. Feltham Properties have been in pre-application consultation with the Council regarding this situation and identifying that there is merit in amending the RSA1 (formerly HSA1) allocation to include this left over land. This would represent positive planning and facilitate a more coordinated development of this part of the town.</p> <p>The revised policy could include appropriate design objectives to seek to ensure that the additional land is suitably designed such that the character of Monks Lane, with its established treelined hedge is retained in keeping with the Sandleford Park master plan.</p> <p><i>(attachment)</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Modification of the RSA1 allocation boundary to include land immediately north between the existing boundary and Monks Lane. The inclusion of appropriate design criteria to respect the character of Monks Lane and the Sandlford Park development.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Feltham Properties has a controlling interest in site RSA1 and considers the policy to be out of date.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1828
Chapter / Policy / Appendix Number	Policy RSA 1
Chapter / Policy / Appendix Title	Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)
Order	82
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A superficial and bedrock aquifers.</p> <p>We would not support any additional flows to Newbury STW. Newbury STW is currently at around 98% of its dry weather flow- DWF capacity, and the development planned to drain to the STW would certainly take it over capacity. A new DWF permit would be required that ensured no deterioration of any quality elements. Newbury STW is to get a 0.1mg/l phosphorus permit limit during AMP 8. This is to meet the CSMG requirements of getting the River Kennet SSSI to good status. Before any development connecting to Newbury STW proceeds, we would need to have confidence that the additional phosphorus load would not undermine the AMP 8 objectives. 0.1mg/l is a 'stretch target' and TW would need to have confidence they would be able to meet that target with any additional loading. The Environment Act will compel water companies to reduce their phosphorous loading from STWs by 80% from a 2020 baseline. Permit limits lower than 0.25mg/l do not count towards that target so higher loads to a STW with a permit limit lower than 0.25mg/l may undermine a water companies' ability to meet the Environment Act objectives. Newbury is a high spiller, and additional developments and flows will increase frequency of spilling. Therefore, we would not support any additional flows entering - the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA1.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1815
Chapter / Policy / Appendix Number	Policy RSA 1
Chapter / Policy / Appendix Title	Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)
Order	82
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	Turley (Hathor Property) Table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Delivery of Proposed residential site allocations</p> <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been 'carried over' from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Following an initial review of this progress, the table below lists those sites where there has been no progress or where progress has stalled are listed in the table below [for table in full, see attachment 'Turley (Hathor Properties) Table'], along with a review of their current planning status.</p> <p>Retained allocation from Core Strategy: Land north of Newbury College, Monks Lane, Newbury (site ref. HSA 1) This is a site allocation being carried over from the Housing Site Allocations DPD (adopted 2017) for approximately 15 dwellings.</p> <p>Planning status: The site benefits from outline permission (application reference 19/00669/OUTMAJ) for 16 dwellings dated August 2019, and reserved matters approval dated January 2021 (application reference 20/00346/RESMAJ).</p> <p>The AMR 2022 states that there is a delay in development due to a revised scheme incorporating additional land and increased number of dwellings.</p> <p>Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period.</p> <p>The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	Yes

* Yes	
* No	
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1786
Chapter / Policy / Appendix Number	Policy RSA 1
Chapter / Policy / Appendix Title	Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)
Order	82
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Policy RSA 2 Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS985
Chapter / Policy / Appendix Number	Policy RSA 2
Chapter / Policy / Appendix Title	Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)
Order	84
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1163
Chapter / Policy / Appendix Number	Policy RSA 2
Chapter / Policy / Appendix Title	Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)
Order	84
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	As the Council will know, it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>As a result of the lack of Conservation Area Appraisal and insufficient heritage assessment, currently we regard RSA2 as unsound because it is not based on proportionate evidence as required by paragraph 35 of the NPPF. We advise that proportionate heritage assessment is done on RSA2 at this stage to inform this allocation.</p> <p>Though this site is carried forward from the adopted site allocations development plan document and at the time of writing a development proposal has been submitted for determination (23/00310), the site's proximity to the conservation area does not appear to be mentioned in the Sustainability Appraisal. In principle we advise more detailed assessment to inform the allocation, given its proximity to the conservation area.</p> <p>Paragraph 206 of the NPPF local planning authorities to look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.</p> <p>We envisage particular sensitivities in the south west corner of the site, with the potential to impact on the rural character of the western approach to the conservation area.</p> <p>Also, there is the opportunity for any scheme to respond positively to the local context i.e. the character of the conservation area to influence the character of the development in a positive way. For this to be realised, further evidence is needed on the relationship between this site and the conservation area.</p> <p>We note and support the proposed criterion: "Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>We note and support the proposed criterion: "Development will protect and enhance the special architectural and historic interest of the Speen Conservation Area". We encourage the preparation of a</p>

	Conservation Area Appraisal as a priority to support effective decision- making and implementation of this policy.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<u>Evidence base</u> More detailed heritage assessment to inform the allocation, which may result in amendments to the policy.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1428
Chapter / Policy / Appendix Number	Policy RSA 2
Chapter / Policy / Appendix Title	Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)
Order	84
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Speen Parish Council recognise that outline planning permission has been granted for this site, but remain extremely concerned about the location of the road access to the site on the A4 (Bath Road). The visibility splay is set at the absolute minimum and does not take into account several aggravating factors, including incline and nationally recognised stopping distances. We will remain opposed to the current access plan as it introduces an increase risk to life.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1787
Chapter / Policy / Appendix Number	Policy RSA 2
Chapter / Policy / Appendix Title	Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)
Order	84
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	Yes

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Environment Agency

Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1829
Chapter / Policy / Appendix Number	Policy RSA 2
Chapter / Policy / Appendix Title	Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)
Order	84
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ2+3, principal, and secondary A bedrock aquifer.</p> <p>This site would require a Flood Risk Assessment which demonstrates requirements of NPPF and PPG. This is due to its size (greater than 1 hectare or confirm).</p> <p>We would not support any additional flows entering the Newbury STW - a known high spiller until significant work has been done to tackle the causes of the frequent spills. As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA2. (Please take notes of the details provided under RSA1 <PS1828> regarding wastewater discharge constraints).</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy RSA 3 Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS245
Chapter / Policy / Appendix Number	Policy RSA 3
Chapter / Policy / Appendix Title	Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)
Order	86
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This policy was formerly 'RSA4' in the Regulation 18 Consultation Document and out comments on this still remain relevant. However it is noted that in the two years since the last Local Plan Review consultation, the full planning application which was pending consideration at this time has now been granted permission. Since this time, a Section 73 application has been submitted to vary conditions relating to the plans and hard landscaping, this application is pending consideration. A further application to discharge a pre-commencement condition has been approved. It is also understood that a housebuilder, namely Cala Homes, has now acquired the site and construction is imminent. As such, it is considered that the 'proposed allocation' is in fact retrospective which does not constitute good plan-making and we would therefore request that the allocation is now removed from the Local Plan Review.</p> <p>If this allocation were to be deleted, as suggested, it will need to be replaced by an allocation of a similar size, or larger, to ensure the housing requirement is met. As highlighted in our previous representations, the approved site layout plan for land at Colely Farm provides links through to the land east of Stone Lane. It is considered that the land east of Stoney provides a logical extension to the previous allocation and is clearly located in an area which the Council considers appropriate for the development of new homes. As such, it should be considered for allocation within the Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS986
Chapter / Policy / Appendix Number	Policy RSA 3
Chapter / Policy / Appendix Title	Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)
Order	86
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1830
Chapter / Policy / Appendix Number	Policy RSA 3
Chapter / Policy / Appendix Title	Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)
Order	86
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary superficial aquifer, secondary A bedrock aquifer.</p> <p>We would not support any additional flows entering the Newbury STW - a known high spiller until significant work has been done to tackle the causes of the frequent spills. As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA3. (Please take notes of the details provided under RSA1 <PS1828> regarding wastewater discharge constraints).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1816
Chapter / Policy / Appendix Number	Policy RSA 3
Chapter / Policy / Appendix Title	Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)
Order	86
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	Turley (Hathor Property) Table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Delivery of Proposed residential site allocations</p> <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been 'carried over' from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Following an initial review of this progress, the table below lists those sites where there has been no progress or where progress has stalled are listed in the table below <i>[for table in full, see attachment 'Turley (Hathor Properties) Table']</i>, along with a review of their current planning status.</p> <p>Retained allocation from Core Strategy: Land at Coley Farm, Stoney Lane, Newbury (site ref. HSA 3)</p> <p>This is a site allocation being carried over from the Housing Site Allocations DPD (adopted at 2017) for approximately 75 dwellings.</p> <p>Planning status: A full application has been approved in June 2021 (application reference 20/00604/FULEXT). A review of WBC's online application search demonstrates that several discharge of condition applications have been approved. From a review of Google maps, no development has commenced on site.</p> <p>Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period.</p> <p>The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy RSA 4 Land off Greenham Road, South East Newbury (Site Refs: HSA 4)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS987
Chapter / Policy / Appendix Number	Policy RSA 4
Chapter / Policy / Appendix Title	Land off Greenham Road, South East Newbury (Site Refs: HSA 4)
Order	88
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
* Yes
* No

Please give reasons for your answer

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1831
Chapter / Policy / Appendix Number	Policy RSA 4
Chapter / Policy / Appendix Title	Land off Greenham Road, South East Newbury (Site Refs: HSA 4)
Order	88
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on Historic landfill site (Pinchington Lane), secondary A superifical and bedrock aquifers, SPZ3.</p> <p>This site would require a Flood Risk Assessment which demonstrates requirements of NPPF and PPG. This is due to its size (greater than 1 hectare).</p> <p>This site is partly located atop a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p>We would not support any additional flows entering the Newbury STW - a known high spiller until significant work has been done to tackle the causes of the frequent spills. As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA4. (Please take notes of the details provided under RSA1 <PS1828> regarding wastewater discharge constraints).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	

<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Policy RSA 5 Land at Lower Way, Thatcham (Site Ref: THA025)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS617
Chapter / Policy / Appendix Number	Policy RSA 5
Chapter / Policy / Appendix Title	Land at Lower Way, Thatcham (Site Ref: THA025)
Order	90
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>26. 8 – Non Strategic Site Allocations. RSA5. This will have a large impact on Theale's roads and infrastructure with more traffic, pollution, and congestion etc. The A4 already floods and increased traffic will exasperate such problems.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Thames Water
<p>Consultee Full Name</p>	Thames Water
<p>Consultee Organisation</p>	Thames Water Utilities Ltd
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS988
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 5
<p>Chapter / Policy / Appendix Title</p>	Land at Lower Way, Thatcham (Site Ref: THA025)
<p>Order</p>	90
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1832
Chapter / Policy / Appendix Number	Policy RSA 5
Chapter / Policy / Appendix Title	Land at Lower Way, Thatcham (Site Ref: THA025)
Order	90
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A superficial and bedrock aquifers. Adjacent to historic landfill sites (Fishing Club and Lower Way)</p> <p>There is a historic landfill historic landfill next to site which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance Which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p>We would not support any additional flows entering the Newbury STW - a known high spiller until significant work has been done to tackle the causes of the frequent spills. As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA5. (Please take notes of the details provided under RSA1 <Ps1828> regarding wastewater discharge constraints).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1788
Chapter / Policy / Appendix Number	Policy RSA 5
Chapter / Policy / Appendix Title	Land at Lower Way, Thatcham (Site Ref: THA025)
Order	90
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	Yes

delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1720
Chapter / Policy / Appendix Number	Policy RSA 5
Chapter / Policy / Appendix Title	Land at Lower Way, Thatcham (Site Ref: THA025)
Order	90
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Full approval has been given by West Berkshire Council for 91 dwellings on this site by 18/00964/FULEXT. This has a single access from Lower Way. This approved application does not include cycle linkages through the site, despite a specific request by Thatcham Town Council. The development does not front onto Lower Way, and one property is only around 1m away from the public footpath that now runs through the site.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	Point (i) in Policy RSA7 (Council note - the site referred to is RSA5 in LPR) needs to be amended as follows: (i) Provision for approximately 85 <u>91</u> dwellings, with a mix of dwelling sizes and types.

	<p>(ii) The site should be accessed via Lower Way. To ensure permeability through the site, the scheme should be designed with the potential for two accesses to be provided. Pedestrian and cycle linkages will be expected through the site and linking to the surrounding area.</p> <p>(iv) It is expected that development will front onto Lower Way to enable effective integration with the existing built form and be set back from the existing public rights of way to the east and west of the site. <i>(added text is underlined; deleted text is struck through)</i></p> <p>The consequential change to the number should be made to Policy SP13.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thattham Town Council is the principal representative body of the community of Thattham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS989
Chapter / Policy / Appendix Number	Policy RSA 6
Chapter / Policy / Appendix Title	Stoneham's Farm, Long Lane, Tilehurst (Site Ref: HSA 9)
Order	93
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Woodland Trust
Consultee Full Name	Ms Bridget Fox
Consultee Organisation	The Woodland Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS856
Chapter / Policy / Appendix Number	Policy RSA 6
Chapter / Policy / Appendix Title	Stoneham's Farm, Long Lane, Tilehurst (Site Ref: HSA 9)
Order	93
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 00:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	The policy provides protection for ancient woodland in line with the NPPF.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	Yes

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The NPPF requires protection for ancient woodland.</p> <p>This site is adjacent to ancient woodland Vicarage Copse/Wood (SU65367453) PAWS 19.3 Ha.</p> <p>We support the policy wording</p> <p><i>h. The development design will provide appropriate buffers of at least 15 metres between the development and the ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	n/a
<p>4. Proposed Changes</p>	n/a
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	n/a
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1833
Chapter / Policy / Appendix Number	Policy RSA 6
Chapter / Policy / Appendix Title	Stoneham's Farm, Long Lane, Tilehurst (Site Ref: HSA 9)
Order	93
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A superficial and bedrock aquifers</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS990
Chapter / Policy / Appendix Number	Policy RSA 7
Chapter / Policy / Appendix Title	72 Purley Rise, Purley on Thames (Site Ref HSA 11)
Order	95
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1834
Chapter / Policy / Appendix Number	Policy RSA 7
Chapter / Policy / Appendix Title	72 Purley Rise, Purley on Thames (Site Ref HSA 11)
Order	95
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, principal bedrock aquifer</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy RSA 8 Land adjacent to Bath Road and Dorking Way, Calcot (Site Ref HSA 13)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS618
Chapter / Policy / Appendix Number	Policy RSA 8
Chapter / Policy / Appendix Title	Land adjacent to Bath Road and Dorking Way, Calcot (Site Ref HSA 13)
Order	97
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 27. RSA8. This is on a flood plain and will have a severe impact on the surrounding area. It is also next to the M4 and will suffer from extensive air and noise pollution.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Holybrook Parish Council</p>
<p>Consultee Full Name</p>	<p>Pamela Kirkpatrick</p>
<p>Consultee Organisation</p>	<p>Holybrook Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS646</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy RSA 8</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Land adjacent to Bath Road and Dorking Way, Calcot (Site Ref HSA 13)</p>
<p>Order</p>	<p>97</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	<p>Web</p>

* Unknown	
Response Date	03/03/2023 11:31:15
Attached Files	Local_Plan_Review_HPC_Response_02_2023.pdf (1)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The Local Plan is used by developers and, as a result, development proposal are not sufficiently modified to take account of local needs and objections because the plan is not strong enough in favour of protecting neighbourhoods as per our comments.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it	No

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS991
Chapter / Policy / Appendix Number	Policy RSA 8
Chapter / Policy / Appendix Title	Land adjacent to Bath Road and Dorking Way, Calcot (Site Ref HSA 13)
Order	97
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email</p>

	<p>Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Environment Agency</p>
<p>Consultee Full Name</p>	<p>Judith Montford</p>
<p>Consultee Organisation</p>	<p>Environment Agency</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1835</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy RSA 8</p>

Chapter / Policy / Appendix Title	Land adjacent to Bath Road and Dorking Way, Calcot (Site Ref HSA 13)
Order	97
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, principal bedrock aquifer</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading</p>

	STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Way, Joelle
Consultee Full Name	Joelle Way
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS29
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	06/02/2023 17:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I would also like to add on the follow reasons to object the proposed work in Theale (Plan Review 2022-19) - 40 homes on Whitehart Meadow. Whitehart Meadow is the area of land between the Woodfield Way estate and the M4 and 60 homes on the site of the old Theale sewage works. This would be off the end of Blossom Lane.</p> <p>I live very close to the proposed sites, and I am very concerned these developments would heavily impact the environmental and ecological habitats and animals that occupy these areas. There are herds of deer who regular use that area, along with the everyday British wildlife species we are so lucky to have in Theale. Also, Theale is a small countryside looking town and that is what makes the area so beautiful and appealing, building an extra 100 homes would not look good for the small town Theale currently provides and even more of a reason against it is that Theale village would not be able to cope with the increased pressures to the public services, food demands, parking spaces etc. I am very against these developments from being built and I wish the plans would be dropped and we can enjoy appreciating the greenspace and wildlife we still thankfully have. Furthermore, the ground is already a concerning flood risk zone and should be excluded from any future developments as it is not safe or stable due to ground conditions.</p> <p>The 100 homes proposed for Theale would be on top of over 440 homes on the western side of Theale that have been given planning permission but not yet built.</p> <p>The proposed extra homes for Theale will put extra pressure on local health services that are already stretched to the limit.</p> <p>Traffic from the proposed extra homes in Theale, in conjunction with that generated by the north east Thatcham site, will make local road congestion worse.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Francis, Jamie</p>

Consultee Full Name	Jamie Francis
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS47
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 18:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	I am emailing to object to the proposed building of further homes in theale village. There is not the infrastructure to support this at all in terms of doctors, dentists or schooling. The roads cannot cope with the volume of traffic as it stands, let alone the increase that these proposed houses would bring. I would be very concerned that anymore homes built in theale would be damaging to the village.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS619
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 28. RSA9 We object to this section for the reasons already stated e.g. increased flood risk, increased traffic and congestion, increased air and noise pollution, unacceptable demand on medical services already under strain etc. 10 – it states a restriction of 2 storey high development which is inconsistent with the specifications to ensure preservation of character.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Turner, Steph
Consultee Full Name	Mrs Steph Turner
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS294
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 15:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I have received your recent 'intouch' leaflet where you claim to oppose inappropriate developments. Yet you are considering housing applications in several areas in Theale. Our village cannot sustain anymore housing developments.</p> <p>Roads are already congested, the doctors surgery is not big enough to take on more patients, it already takes weeks to have a face to face appointment. Theale has already been overdeveloped.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS992
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Capewell, Adam
Consultee Full Name	Dr Adam Capewell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS972
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to voice my concerns over the Local Plan that appears to include up to 200 extra homes being built in Theale.</p> <p>According to the plan an extra 100 houses could be built to the West of the village (policy RSA 9) and a further 100 houses to the East (policies RSA10 and RSA 11).</p> <p>This would be a notable increase in the amount of housing in Theale, and my biggest concern is that these extra homes would put significant extra pressure on local facilities, and in particular the local schools.</p> <p>I have lived in Theale for about <redacted> months, and have a <redacted> year old son. We applied for him to attend Theale Primary School when we moved here. However, we are continually told that there is no space for him due to over subscription at the school. Instead, we have to drive 5 miles each way to his old school in Ford's Farm in Calcot, meaning we are driving about 100 miles a week to take him to school and pick him back up.</p> <p>I do not see how having a further 200 families in the village is tenable, considering the likely extra number of school places that this would require. As our experience shows, there are not enough school places for even one extra family, let alone 200. I seriously doubt that the capacity of the school could be increased enough to accommodate the likely extra number of children in the village.</p> <p>I further note that the High Street already suffers from bad traffic congestion (which we have no choice but to drive through to take our son to school each day), and the increased housing would only make this significantly worse.</p> <p>Whilst I understand the need for extra housing, I would say that Theale is not a suitable place for them.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1192
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The text associated with this allocation should refer to the listed milestone in the north east corner. It is listed GII and the plan should commit to its conservation and ensure it is given suitable setting, preferably in policy. While the milestone may be protected as a by-product of the scheme design, this needs to be made explicit.</p> <p>Also, we note Englefield House, a Registered Park and Garden (GII) north west of the allocation. The Plan would be improved by acknowledging this nearby designated heritage asset.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	The scheme will conserve the listed milestone and enhance its setting
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p>	Yes

* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1836
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, principal bedrock aquifer, secondary A superficial aquifer, close to historic landfill site (Ex British Rail Sites No.1-3)</p> <p>There is a historic landfill historic landfill next to site which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance Which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Hathor Property Limited (Represented by Turley Associates)</p>
<p>Consultee Full Name</p>	<p>Fred Schiff</p>
<p>Consultee Organisation</p>	<p>Hathor Property Limited</p>
<p>Agent Full Name</p>	<p>Mr Simon</p>

	Packer
Agent Organisation	Turley Associates
Comment ID	PS1817
Chapter / Policy / Appendix Number	Policy RSA 9
Chapter / Policy / Appendix Title	Land between A340 and The Green, Theale (Site Ref: HSA 14)
Order	99
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	Turley (Hathor Property) Table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

<p>Please give reasons for your answer</p>	<p>Delivery of Proposed residential site allocations</p> <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been 'carried over' from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Following an initial review of this progress, the table below lists those sites where there has been no progress or where progress has stalled are listed in the table below [for table in full, see attachment 'Turley (Hathor Properties) Table'], along with a review of their current planning status.</p> <p>Retained allocation from Core Strategy:</p> <p>Land between A340 and The Green, Theale 100 dwellings</p> <p>Planning status: Outline application 17/02904/OUTMAJ for up to 104 dwellings approved December 2020.</p> <p>No reserved matters application submitted and the outline permission will lapse imminently.</p> <p>The lack of delivery at this site has been subject to much discussion, and its ability to be brought forward continues to be subject to debate.</p> <p>Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period.</p> <p>The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Policy RSA 10 Whitehart Meadow, Theale (Site Ref THE1)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Way, Joelle
Consultee Full Name	Joelle Way
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS30
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	06/02/2023 17:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would also like to add on the follow reasons to object the proposed work in Theale (Plan Review 2022-19) - 40 homes on Whitehart Meadow. Whitehart Meadow is the area of land between the Woodfield Way estate and the M4 and 60 homes on the site of the old Theale sewage works. This would be off the end of Blossom Lane.</p> <p>I live very close to the proposed sites, and I am very concerned these developments would heavily impact the environmental and ecological habitats and animals that occupy these areas. There are herds of deer who regular use that area, along with the everyday British wildlife species we are so lucky to have in Theale. Also, Theale is a small countryside looking town and that is what makes the area so beautiful and appealing, building an extra 100 homes would not look good for the small town Theale currently provides and even more of a reason against it is that Theale village would not be able to cope with the increased pressures to the public services, food demands, parking spaces etc. I am very against these developments from being built and I wish the plans would be dropped and we can enjoy appreciating the greenspace and wildlife we still thankfully have. Furthermore, the ground is already a concerning flood risk zone and should be excluded from any future developments as it is not safe or stable due to ground conditions.</p> <p>The 100 homes proposed for Theale would be on top of over 440 homes on the western side of Theale that have been given planning permission but not yet built.</p> <p>The proposed extra homes for Theale will put extra pressure on local health services that are already stretched to the limit.</p> <p>Traffic from the proposed extra homes in Theale, in conjunction with that generated by the north east Thatcham site, will make local road congestion worse.</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Ferrier, Sally

Consultee Full Name	Sally Ferrier
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS41
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 18:22:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>I'm responding to the proposed Local Plan review consultation for 2022-39.</p> <p>My name is <name redacted>, I live at <address redacted>.</p> <p>My main concern is the Theale area.</p> <p>"- 40 houses built on Whitehart Meadow - the area of land between the Woodfield Way estate and the M4.</p> <p>- 60 houses built on the site of the old sewage works, off Blossom Lane</p> <p>- 1,500 houses built on the Theale side of Thatcham."</p> <p>At least 50% of each of these if they are approved MUST be social housing. This is the biggest need in our increasingly unaffordable area. These social and maybe 5% affordable homes shouldn't just be flats either! Just because people can't afford to stay in their village doesn't mean they don't want a garden or basic things many people take for granted. It's a village, they are green and plentiful, NO PLACE for flats. My own social home is a maisonette and gives everyone outside space and a garage and is an ideal fit for the village if inspiration is needed.</p> <p>My next concerns is the doctors surgery and schools that are very over subscribed as it is. We would need them making larger & an NHS dentist in the area.</p> <p>Theale already has a bad smell of sewage outside the new Red Lion Flat development on the Englefield road/church street junction. The flats at Leonard court/Elizabeth court already have sewage issues so Theale's entire village will need its sewage waste pipes upgraded and enlarged.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>Off the back of this we have already got several hundred houses coming to the village maybe they need to be the "Guinea pig" and in 5 years after they have been built a new review for Theale can take place to see if they can even cope with those?</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Francis, Jamie
Consultee Full Name	Jamie Francis
Consultee Organisation	
Agent Full Name	
Agent Organisation	

Comment ID	PS48
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 18:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am emailing to object to the proposed building of further homes in theale village. There is not the infrastructure to support this at all in terms of doctors, dentists or schooling. The roads cannot cope with the volume of traffic as it stands, let alone the increase that these proposed houses would bring. I would be very concerned that anymore homes built in theale would be damaging to the village.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kennedy, Charlotte
Consultee Full Name	Charlotte Kennedy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS50
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 18:59:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to voice my opposition to the proposed land development in Theale, namely the building of 40 houses on whitehart meadow.</p> <p>I have a number of major concerns about what is being proposed, especially as it relates to Theale:</p> <ol style="list-style-type: none"> 1 The 100 homes proposed for Theale would be on top of over 440 homes on the western side of Theale that have been given planning permission but not yet built. 2 The plan is being rushed through so as to meet artificial deadlines. 3 The number of homes allocated in the plan ignores the 500 - 1000 flats likely to be built in Newbury at the London Road Industrial Estate, that the council owns, and at a re-developed Kennet Shopping Centre. 4 more homes than necessary would be built on greenfield sites like those proposed for Theale. 5 The proposed extra homes for Theale will put extra pressure on local health services that are already stretched to the limit. 6 Traffic from the proposed extra homes in Theale, in conjunction with that generated by the north east Thatcham site, will make local road congestion worse. 7 There are plenty of deers and other wildlife who live within whitehart meadow and will be killed should this development go ahead. I have picture evidence of said deer living in this area.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holland, Alex
Consultee Full Name	Mr Alex Holland
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS82
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 11:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I strongly object to the proposed planning application that has been submitted in theale (whitehouse meadow and the old sewage works) as I don't believe theale can cope with it.</p> <p>Myra it will be good for the local businesses (shops / pubs etc) however I don't believe that the village can deal with this amount of building work.</p> <p>Firstly it's difficult enough to get an appointment at the local doctors surgery and if you add another 100 homes to the equation it will be near on impossible.</p> <p>Secondly I don't think the schools will be able to deal with it either.</p> <p>Thirdly the amenities in the village struggle from time to time and by adding more homes in the village then this will only get worse.</p> <p>My fourth point is that traffic in the village can be a nightmare at the best of times and by adding another 100 homes to this then the problem will only increase.</p> <p>My fifth point is that the 2 proposed sites both flood and are also homes to local wildlife.</p> <p>My sixth concern is that by building this their will be no boundaries between Theale and Calcot.</p> <p>My seventh concern is the overhead power lines that run across both proposed sites, will this be safe?</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes	

* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Clifton, Mari
Consultee Full Name	Mari Clifton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS98
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	30/01/2023 17:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Please find my objections for the proposed planning of 40 homes on whitehart meadow and 60 homes on the old Theale sewage works.</p> <ul style="list-style-type: none"> • The already very over stretched facilities in the village inc the schools , medical centre surgery , chemist, dentist, facilities for young people. • Traffic that over 500 vehicles will cause to already congested very narrow roads. inc the 400 + homes that already have planning approval. • Congestion of traffic in the high st which has parking on both sides and is gridlocked when buses are trying to get past delivery lorries. • The A4 is very busy and the amount of traffic already using it is gridlocked during the rush hour. • The extra traffic due to the building of homes in Newbury and thatcham. • The negative affect to the local environment, air pollution , green spaces and wildlife. • This would be on top of over 400 homes that already has approval and will be terrible for the small community village of Theale. • There are very little facilities for young people which will encourage them to wander around the village in groups which is very disconcerting for people walking alone.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Button, Andy
Consultee Full Name	Andy Button
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS110
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 15:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing in response to the consultation on the Local Plan. I wish to object most strongly to the two proposed development sites in Theale.</p> <p>The site at Whitehart Meadow for 40 homes is totally unsuitable – many of the houses would be underneath the electricity pylons, they would be next to the M4, and building there would remove the green space between Theale and Reading. This would also increase the amount of traffic using the mini roundabout at the eastern end of the High Street, which is already a pinch point for vehicles.</p> <p>The site at the old sewage works for 60 homes is also totally unsuitable – it could only be accessed by vehicles using Crown Lane and Blossom Lane, both of which are narrow and already congested and have narrow or non-existent pavements.</p> <p>The addition of these potential 100 homes to the 429 already planned for the Lakeside site and the land between The Green and the A340 would represent an increase in Theale's population of over 40%, completely changing the nature of the village for the worse. The current infrastructure is barely coping with the current population as it is.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Young, David</p>
<p>Consultee Full Name</p>	<p>David Young</p>

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS141
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/02/2023 12:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>I have been alerted by my local Councillor (Alan Macro) regarding several proposals for building more new homes in Theale, to be included in the revised Local Plan.</p> <p>The proposals are as follows :-</p> <ul style="list-style-type: none"> • 40 houses built on Whitehart Meadow - the area of land between the Woodfield Way estate and the M4. • 60 houses built on the site of the former sewage works, off Blossom Lane <p>I have previously responded to object to both these proposals in recent years when they have been submitted as formal planning applications to West Berks Council.</p> <p>As a resident living close to both these sites in Theale, as previously I would also like to register my objection to these proposals being included in a revised Local Plan for Theale. Aside from the more detailed objections that were submitted previously, I would add that we have already had approval granted for many new homes to be built in the village and we should not have to suffer yet more house-building and loss of green space.</p> <p>I would be grateful if you could take the above into account when reviewing the Local Plan in the coming weeks.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bahrani, Laith
Consultee Full Name	Laith Bahrani
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS113
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	15/02/2023 16:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Re: Local Plan – Whitehart Meadow, Theale</p> <p>As a resident of Theale village I wish to formally register vehement objection to the proposed local plan referenced above which raises many serious concerns with respect to its impact on the village of Theale, the residents of the village, and the wider area.</p> <p>A non-exhaustive list of objections is presented as follows:</p> <p>Conservation Area</p> <p>The area, or access roads within the area, fall within a designated Conservation Area and setting, and is thus subject to protection as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as per Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act and as designated under Article 50 of the Planning (NI) Order 1991.</p> <p>Conservation Areas are also notable for their biodiversity value. Protected species and habitats need to be addressed when reviewing buildings, sites and planning works. See further point on Destruction of wildlife habitat and protected species.</p>

	<p>In addition, trees in a Conservation Area are automatically protected as if a Tree Preservation Order (TPO) was in place.</p> <p>Invasion of privacy of Theale residents</p> <p>The overlook that will result from any development will pose serious privacy issues especially for the properties surrounding the proposed site. As per Article 8 of the Human Rights Act states a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.</p> <p>Agricultural Land Classification (ALC)</p> <p>Natural England records that the proposed site is grade 3 ALC and thus the land should protected from development under the government policies and legislation to preserve the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals.</p> <p>Flood Risk, Ground Stability and Drainage</p> <p>The Environment Agency designates areas of the proposed site as at RISK from surface water flooding. The eradication of natural ground absorption inherent to this proposal will heighten this risk status for Theale village and adversely affect the foundational integrity of nearby properties and subsequently elevate Home & Buildings insurance premium rates for the surrounding area.</p> <p>Destruction of wildlife habitat and protected species</p> <p>The destruction of habitation required for this development would lead to a further decline in wildlife species such as deer, rabbit, birds, bats and hedgehogs. Hedgehogs are listed as a Species of Principle Importance in England under the Natural Environment and Rural Communities (NERC) Act 2006 Section 41 making hedgehogs a material consideration for Local Planning Authorities (LPAs) during the planning process.</p> <p>Highway safety, inadequate parking and access</p> <p>Theale village is already vastly strained with traffic and parking issues; this proposal will only serve to escalate these issues and stands in direct contradiction with both government and local council policies on congestion and pollution alleviation. Parking facilities in Theale are already oversubscribed and the proposed development would lead to an increase in traffic, congestion and parking issues correlating inversely with a decrease in highway safety.</p> <p>Pylons</p> <p>The site is unsuitable as it encompasses high voltage overhead power lines.</p> <p>Noise/Air/Light/Visual Pollution</p> <p>The development will increase noise, air, light and visual pollution in Theale village both during and post-construction.</p> <p>The proposed site has not been included in either the Strategic Transport Model or the Air Quality Assessment.</p> <p>Loss of natural light</p> <p>The proposed development is in extremely close proximity to numerous residential properties that have benefited from natural space and light for over 20 years. The proposed development would contravene the fair and reasonable 'right to light' claim by residents resulting from the obscuration of a South-East solar trajectory.</p> <p>Negative alteration to the character and nature of Theale village</p> <p>The encroachment on green/brown spaces surrounding Theale and the increased development and traffic will erode the character and identity of Theale village.</p> <p>In summary any proposals to include Whitehart Meadow as a development location should be wholly refused as it stands in direct contradiction to myriad land/heritage conservation policies and would also be to the detriment of the quality, character, safety and amenity value of the area, as outlined in the points above.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Spence, Diana
Consultee Full Name	Diana Spence
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS679
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to strongly object to your proposals to build yet more houses in Theale, due to the following reasons:-</p> <p><u>Whitehart Meadow</u> - Proposal to build 60 houses The area is a flood risk. There are high voltage overhead power units across the area.</p> <p>More important objections:</p> <p>You have already given consent for a total of 440 houses to be built at the western side of Theale - No doubt the building company will submit requests to increase the quantity, as that appears to be the norm. Has this figure been included in your allocation for building in Theale? You mention "infrastructure". Does that mean you will build/extend Theale Medical Centre and arrange employment of more doctors and paramedics? The Medical Centre is struggling to cope with the sheer number, and every increasing number, of patients it already has, so this is an issue of great concern.</p> <p>The horrendous increase in traffic – also taking into account the houses to be built in Thatcham. The sheer volumes will surely increase congestion at the Theale roundabouts with traffic wishing to gain access to the M4.</p> <p>Lastly, Theale is a village. The residents wish it to remain a village. We do not wish to be joined up with Calcot or become a town. Theale has already taken a huge allocation of newbuild houses/flats and has, therefore, heavily committed to the need for more housing.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	National Grid plc (Represented by Avison Young)
Consultee Full Name	National Grid UK
Consultee Organisation	National Grid UK
Agent Full Name	Mr Matt Verlander
Agent Organisation	Avison Young
Comment ID	PS365
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 09:09:00
Attached Files	PS365 National Grid Map (RSA10).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below.</p> <p>RSA10 Whitehart Meadow, Theale (THE1) - Asset Description: 4YG ROUTE TWR (040 - 110): 400Kv Overhead Transmission Line Route: BRAMLEY - DIDCOT 1 (<i>see attachment for map</i>)</p> <p>Further Advice</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS620
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>29. RSA10 C. Access is proposed from the High Street which already cannot cope with the volume of traffic and is often single file. This needs revisiting.</p> <p>30. RSA10. Whitehart Meadow has been struck out and a reason should be given as to why. A Landscape Assessment needs to be referred to.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Central Corporation Projects Ltd (Represented by Bell Cornwell)
<p>Consultee Full Name</p>	Central Corporation Projects Ltd
<p>Consultee Organisation</p>	Central Corporation Projects Ltd
<p>Agent Full Name</p>	Michael Cole
<p>Agent Organisation</p>	Bell Cornwell LLP
<p>Comment ID</p>	PS687

Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:55:00
Attached Files	PS687 Bell Cornwell (Central Corporation Projects) Full Resposns
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>Extract of representation relevant to consultation point</i> The Council previously assessed the site as suitable for a residential development of approximately 100 dwellings and gave it the reference number RSA16. This has subsequently changed to RSA10 and the number of dwellings has been reduced to 40 along with a reduction in identified area for the allocation.

These representations continue to support the proposed allocation with reference to the Council's evidence base and our own detailed technical work but challenge the decision for a reduction in units to 40 and the size of the allocation.

We make some additional comments regarding the capacity of the site and enclose in Appendix 2 a revised indicative masterplan which shows how, to ensure effective use of land, a residential development could be delivered, including a mix of houses of different sizes, appropriate to this sustainable location. This plan utilises the previously approved and constructed existing access road and bridge over the brook and, importantly, ensures that the separate identities of Calcot and Theale are maintained by providing a significant area of green infrastructure/public open space in accordance with the Council's draft policy for the site. Alongside this is a revised allocation plan contained in Appendix 1.

We have previously promoted the site as suitable for either residential or employment uses, given the highly sustainable location. We are flexible regarding the final numbers to be accommodated on the site subject to making effective use of land which remains a key principle of national policy. In order to achieve this the number of dwellings should be no less than 70.

We have submitted evidence to the Council through our previous representations of a successful flood map challenge which has resulted in the Environment Agency reclassifying the flood risk of the site and updating the national flood maps to reflect this information. This matter, which was an issue for a previous residential planning application at the site in 2017 has therefore been addressed.

We confirm that the site can be delivered as proposed, and the proposed developable area of the site is entirely within flood zone 1 and is therefore in a sequentially preferable location, appropriate for development.

We have had a significant quantum of technical work prepared to support a future development at the site so are able to confirm that the site can be delivered for the proposed use without technical concerns. We refer to this elsewhere in these representations.

Additionally, the site is in the ownership of a developer who is actively promoting the site for development and has already invested in the necessary technical work to inform the detailed development of the site. The Council can therefore have the necessary confidence that the site is deliverable in terms of the definition in the National Planning Policy Framework (NPPF).

We note that whilst the site at Blossom Lane is retained as an allocation (RSA11), there is an unresolved access issue which could be addressed by the consideration of an access through White Hart Meadow. We have therefore again shown this in indicative form as part of our proposal and would be pleased to discuss this further with the Council and/or the site promoter as appropriate.

OUTLINE PROPOSALS FOR THE SITE (RSA10)

The White Hart Meadow site has a long planning history, and it benefits from an extant consent for a 160 bed hotel which has had the access and bridge constructed. Site Layout Plan provided below and it should be noted this extends the development footprint north east of the overhead pylons into the proposed landscaped zone and beyond the currently proposed red line allocation.

<map given in attached Full Rep>

A planning application for up to 130 dwellings (16/03613/OUTMAJ) was refused in 2017. The only technical reason for refusal however was a flooding issue, which has been overcome. The proposed layout at that time was as follows:

<site plan given in attached Full Rep>

The Council, on preparation of the emerging plan had also previously assessed the site as suitable for a residential development of approximately 100 dwellings and given it the reference number RSA16. At the regulation 18 stage we evidenced that, to ensure effective use of land, up to 134 units could be delivered, including a mix of houses and flats of different sizes, appropriate to this sustainable location.

The illustrative layout advanced is detailed <see attached Full Rep> for ease of reference:

On 28th April however, we were informed that following the commission of a landscape assessment for the Theale sites (Sewage Treatment Works, Whitehart Meadow and land at Hoads Way) the Council has revised their position with a recommendation to contain the developable area to a smaller area than what is currently being proposed, with design parameter recommendations such as restricting the developable area to the west of the power lines, height to two storeys, extensive landscaping and tree planting, and buffer to Sulham Brook.

Taking the recommendations of the landscape assessment into account, this would reduce the site area to some 1.8ha, and development potential to approximately 42 dwellings, at a density of 30dph and 75% of the site, using the Council's Pattern Book approach. This relates to the area shaded purple only, as shown in the following plan

<plan given in full rep>

As part of the Council's evidence gathering, other responses were received by the Council stating that "The AONB Board and Natural England comment that the power lines form a 'natural' break point for defining the developable area, whilst still providing a buffer to the M4. Open space can be provided beyond the power lines and used to enhance the area. The Environment Agency require a 10m wide undeveloped buffer zone on both sides of the Sulham Brook."

CONSIDERATIONS

For the avoidance of doubt our client remains flexible regarding the final numbers to be accommodated on the site but this has to be subject to making effective use of land which remains a key principle of national policy.

The illustrative plan and revised allocation plan provided meets the criteria of draft policy RSA10 other than the proposed density, quantum of development and area for consideration.

We are of the firm view that by reducing the extent of development, as recommended by the landscape assessment, does not achieve this and as evidenced in the updated LVIA submitted, we see no reason why the south western part of the site cannot be developed when presented with an enhanced landscape plan and revised layout in this area, as the masterplan submitted will retain an open/sylvan character between Theale and Calcot, which is in line with the comments from the AONB Board and Natural England.

We have previously submitted evidence to the Council through our previous representations of a successful flood map challenge which has resulted in the Environment Agency reclassifying the flood risk of the site and updating the national flood maps to reflect this information. This matter, which was an issue for a previous residential planning application at the site in 2017 has therefore been addressed and we are more than content to retain a 10m wide undeveloped buffer zone on both sides of the Sulham Brook alongside the undeveloped buffer zone surrounding the pylons.

Using the AONB Board and Natural England's comments, that the power lines form a 'natural' break point for defining the developable area, as a starting point, the master plan provided has been revised to remove any development on the east side of the pylons with a reduction in the mass of car parking under the pylons with enhanced landscaping along the west side of the access into the site and an increased landscape buffer on the frontage of the High Street. Retaining significant expanses of semi wooded/scrub and wetland areas screening the development from the M4.

The masterplan should be seen as illustrative at this stage, however this is submitted to show how the site could be delivered for a residential development of approximately 72 dwellings in an area identified within our revised allocation plan submitted. A reduction of 62 dwelling from that previously promoted at the Regulation 18 stage and only 30 more than that recommended in the council's landscape assessment. The revised 72 dwellings scheme is shown below within a site area of 3.17 hectares amounting to a density of approximately 23 dph.

<site plan given in attached full rep>

The proposal has been informed by the technical work that has been carried out for the site, in particular the more recent Landscape and Visual Impact Assessment dated June 2022, as well as by the policies set out in the emerging Local Plan. Photomontages have been prepared and appending in Appendix 4.

View 1 is taken travelling east along the High Street; View 2 is looking back at the proposed access onto the High Street and View 3 is taken from the foot bridge which was previously identified as a view of concern.

What is evident from these views is that the development to the front of the site, as proposed in the submitted layout, will only have a very localised impact at the point of the access with medium and long-distance views being obscured by existing and proposed soft landscaping. The localised view in viewpoint 2 is also well screened with only roof top on show forming an acceptable transition to the countryside in one direction and the settlement beyond and not out of character with residential development in the area.

This reinforces, our submission that the revised masterplan conserves and enhances the special qualities of the nationally designated landscape of the adjacent North Wessex Downs AONB. In turn conserving and strengthening existing boundaries elements assisting in the retention of the of the individual identity of settlements, maintaining a sense of separation between Theale and Calcot ensuring no suburbanisation or loss of wooded character to the setting to the AONB.and providing a transition of development between the settlement and the countryside by a proposal designed around more family housing only 2 storeys in height, rather than the 3 storeys previously proposed.

This amendment provides for a continuation of the character of housing within Theale and its network of footpaths, ensuring no suburbanisation or loss of wooded character to the setting to the AONB.

In fact, the enhancement of this area to the east will provide an ideal opportunity to create a positive buffer to the nearby AONB at the same time retaining the open character of the setting of Theale and there is also the potential opportunity to consider a more comprehensive approach to development in this part of Theale alongside the semi adjacent site THE7 (to the north (and identified in Policy RSA11)). To demonstrate how this may be achievable, the landscape strategy provided identifies a possible future improved access and amenity area linking this site to THE7.

In terms of the mix of development, the illustrative masterplan shows how a mix of dwelling sizes and types could be provided on the site, including 2, 3 and 4-bed houses and 1 bed flats. This mix takes into account the location of the site and the surrounding character of the area. The mix broadly reflects the indicative need shown in table 3 of the emerging Local Plan. The policy is clear that the mix is not intended to be prescriptive.

In terms of tenure, the delivery of the site is intended to be policy complaint – the emerging policy (SP19) seeks 30% of affordable housing provision on brownfield sites of this scale. There may also be scope to provide an element of self-build and custom-build provision in accordance with emerging Local Plan policy DC17.

Parking spaces are shown on the masterplan, for both residents and visitors. The quantum of these reflects the Council's policy. Turning areas are also indicated, together with garden and amenity spaces and the linkages to the surrounding residential development. Additionally, we have included electric charging points on the plan in accordance with emerging policies DC35 and DC36.

We propose a high-quality design which is well proportioned and responsive to local vernacular. It is considered that the revised design and parameters of the site, together with the proposed landscaping, can assist in the mitigation of noise from the M4 motorway for adjoining neighbours of the site, as well as residents.

We also show the significant area of open space/green infrastructure that will be included to the east of the site to provide an improved edge to the settlement in this location and to ensure that the separate identities of Calcot and Theale are maintained. This area has the potential to provide play areas and facilities, as needed and to make a positive contribution to biodiversity net gain.

An access from the site through to the proposed allocation at Blossom Lane is shown on the masterplan, in indicative form.

TECHNICAL WORK

Our client has had a range of technical work carried out in order to inform the key parameters of the development of the site. It confirms that the site is deliverable without technical constraints.

This includes the following studies:

- Level 2 Flood Risk Assessment and Drainage Strategy prepared by Archibald Shaw.
- Transport Assessment and Workplace Travel Plan, prepared by Stuart Michael Associates
- Preliminary Noise Impact Assessment prepared by Sharps Acoustics (preliminary at this stage).
- Revised Landscape and Visual Impact Assessment and a Landscape Strategy prepared by Draffin Associates (Appendix 3)
- Ecological appraisal prepared by Richard Tofts Ecology has informed the proposal and follows on from earlier ecological work at the site which included specific protected species survey work.

The technical work will continue to be refined as the proposal progresses. We are happy to provide the work that has been carried out to date to the Council.

WEST BERKSHIRE'S ASSESSMENT AND EVIDENCE BASE

We have reviewed the Council's emerging Local Plan, evidence base, site assessment and interim Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA).

We support the continued recognition of Theale as a Service Centre within the hierarchy set out within the Local Plan and support that Theale is seen as a focus for additional housing within the Eastern Area of the District. Whilst we do not object to its definition as a 'Rural Service Centre' (Policy SP3), as noted in the Regulation 18 consultation we consider that this could be appropriately simplified to 'Service Centre'. It is not accurate to describe Theale as a rural area, given its location on the edge of Reading and in very close proximity to the major roads network as well as large scale housing and employment areas.

Rural Service Centres are described in the emerging local plan as having 'reasonable accessibility'. Theale's accessibility is higher than this and could justifiably be described as 'excellent'. It may therefore be more appropriate to separate Theale out from the other 'rural' service centres which are smaller scale and less accessible and put it in a separate category of 'service centre' or 'small town'.

In terms of the detailed assessment of the site set out in the SA/SEA, the Landscape Sensitivity and Capacity Assessment for: THE1 land at Whitehart Meadow and the Council's Site HELAA we note the detail of the history of the site, including the successful flood map challenge. In some ways this information is now merely historic - all that is required is a simple reference to the fact that the developable area of the site lies within flood zone 1.

We confirm that we have had careful regard to the surrounding character of the area and the surrounding landscape and that the proposal has been informed by technical work on landscape in the form of an LVIA. The purpose of the LVIA is to identify the special characteristics of the existing landscape, to assess the likely impacts of the proposal and to consider the most appropriate mitigation measures and their residual impact to integrate the proposal with the local context.

We have addressed the points raised through the HELAA through the technical work that has been carried out to inform the proposal for the site.

With regards to viability, the proposal will provide a policy compliant quantum of affordable housing and a mix which accords with the housing need at the time of an application.

We support the recognition in the site assessment that the site is in single ownership and can come forward in the next five year period. This means that the site can make a timely contribution to housing delivery in the District.

CONCLUSION

We support the proposed allocation of White Hart Meadow for residential development but not the identified density and area of allocation.

This is a positive approach by the Council which reflects the highly sustainable location of the site. We have included an indicative masterplan (Appendix 2) as part of these representations which shows how the site can be delivered.

Whilst the site is allocated in policy RSA 10 for 'approximately' 40 dwellings, we seek flexibility with regard to the final numbers for the site to ensure that an effective use of land is achieved, at an appropriate density for the site and the surroundings. The final number is proposed to be informed by the technical work for the site of which we anticipate a density of approximately 72 dwellings on an enlarged allocation area as submitted, could be achievable whilst conforming to the criteria of emerging Poly RSA10.

Policy RSA10, as drafted, is not an appropriate strategy to maximise and make efficient use of land inconsistent with the NPPF.

The site has the benefit of being able to provide a high level of green infrastructure to provide a buffer to separate the developable area from the highways network and to ensure the separate identity of Theale is maintained.

We confirm that White Hart Meadow can be confirmed as a deliverable site and is being actively promoted by a willing developer who is committed to bringing the site forward.

Attachments:

- Full response inc. Appendix 1 (Revised Allocation Plan), Appendix 2 (Illustrative Master Plan), Appendix 3 (Revised LVIA), Appendix 4 (Photomontages of promoted scheme)

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>To discuss matters in dispute relating to Policy RSA10 in respect of the area of allocation and, density and quantum of development.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sivyer, John
Consultee Full Name	Mr John Sivyer
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS292
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 14:52:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Good afternoon,</p> <p>These developments are of concern to me. The extra traffic to access these will be on unsuitable roads that are already congested with on road parking and the car repair business in Theale High Street.</p> <p>Furthermore school places and the doctor surgery are already over used and unable to cope with the existing residents needs.</p> <p>Currently the parking in the High Street serves the businesses and residents well, but extra traffic will cause issues with deliveries and bus services.</p> <p>Theale village is under threat from these developments and would just become another part of the Reading sprawl. The noise from the M4 traffic will make living in these new houses unpleasant and the air quality detrimental to the residents health.</p> <p>For these reasons I object to the proposed developments.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cox, John
Consultee Full Name	John Cox
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS300
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 16:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>West Berkshire Council are proposing to allocate Whitehart Meadow as a site for 40 homes in its Local Plan review. This is despite the fact that there are several reasons why most or all of the site should not be built on. This is for the following reasons:</p> <ol style="list-style-type: none"> 1. Flood risk 2. High voltage overhead power lines cross the site 3. Noise and pollution from the motorway 4. The site has not been included in the Air Quality Assessment 5. The site has not been included in the Strategic Transport Model, meaning that the effect of traffic generated from the site has not been assessed. 6. Need to preserve the gap between Theale and Calcot/Tilehurst 7. Possible land contamination.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bush, Oliver
Consultee Full Name	Mr Oliver Bush
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS305
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 21:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Following the news that two housing sites have been proposed for unsuitable land in Theale, I would like to register my objection to such a plan.</p> <p>Ref:</p> <p>40 houses on Whitehart Meadow</p> <p>60 homes on the site of the old sewage works, off Blossom Lane</p> <p>The land is a greenspace, and a wet area for most of the year. There is not enough infrastructure to handle this plan alongside the housing plans at the end of Theale (Lakeside).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Turner, Steph
<p>Consultee Full Name</p>	Mrs Steph Turner
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS295
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 15:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I have received your recent 'intouch' leaflet where you claim to oppose inappropriate developments. Yet you are considering housing applications in several areas in Theale. Our village cannot sustain anymore housing developments.

	Roads are already congested, the doctors surgery is not big enough to take on more patients, it already takes weeks to have a face to face appointment. Theale has already been overdeveloped.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Dowdeswell, Barnaby
Consultee Full Name	Mr Barnaby Dowdeswell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS308
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 23:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Frankly it's ridiculous that this is even allowed to be considered - these areas of green space are known and evidenced habitats for local deer, rabbits, foxes and other other wildlife. We are meant to be protecting green space, not destroying it. This simply cannot be allowed to go ahead</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Scott-Picton, Virginia
Consultee Full Name	Virginia Scott-Picton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS464
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I would like to express my concerns regarding the proposed development at Whitehart Meadow and Blossoms Lane. These green spaces provide habitat for wildlife as well as recreational areas for both children and adults to enjoy. I do understand that we do need houses built, and inevitably this will encroach on green spaces but I think that we do need to have green pockets for our children to learn in and play in, and wildlife corridors to balance the cost benefit with the nature around us that is vital for health and well-being, and the world that we need to preserve for the next generation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Fletcher, Malcolm
Consultee Full Name	Mr & Mrs Malcolm

	Fletcher
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS970
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	

* No	
Please give reasons for your answer	The Plan is unsound for the following reasons: RSA10 & RSA11 1 Flood risk to the land. 2 High voltage overhead power lines across the site. 3 Noise and pollution from the motorway. 4 No air quality assessment 5 Theale would not cope with the increased traffic. 6 Land contamination – possible for both sites 7 RSA11 -access to the site is by a single track road. 8 Developments would no longer mean Theale would have a village feel. Local medical and educational would not be able to meet the increased need
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS993
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Batchelor, Deirdre & John
Consultee Full Name	Mr & Mrs Deirdre & John Batchelor
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS310
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 00:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>To who it may Concern</p> <p>We have lived in There for 22 years and you have been trying to build on Whitehart Meadow for all this time as well ass the Sewage Works nearby.</p> <p>Again we would stress that the infrastructure on the village - i.e. roads, services, doctors' surgery would be greatly affected. We always thought you could not build houses under pylons.</p> <p>We strongly object to all these houses going up which will affect our nice village.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Painter, Jacqueline
<p>Consultee Full Name</p>	Jacqueline Painter
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS960
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I am submitting my objection to LPR RSA10 Whitehart Meadow, Theale – 40 properties, as part of the West Berkshire Local Plan Review 2022 – 2039. I am a current resident of Woodfield Way and I object to the plans on the following grounds:

	<ul style="list-style-type: none"> - Flood risk - High voltage overhead power lines cross the site - Noise and pollution from the motorway - Possible land contamination - Need to preserve the gap between Theale and Calcot/Tilehurst - Impact on the Area of Outstanding Natural Beauty - Risk from fluvial, surface water and ground water flooding - Impact on the Theale High Street Conservation Area - Impact on surrounding housing - Impact on infrastructure and amenities - Impact on Theale's highways network
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hudson, Lauren
Consultee Full Name	Lauren Hudson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS812
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	02/03/2023 13:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I would like to submit my objection to the proposed housing developments for whitehart meadow and blossom Lane in theale.</p> <p>Reasons for objection:</p> <ol style="list-style-type: none"> 1 Infrastructure. Theale currently is unable to accommodate the number of users for the GP surgery. There are no plans to expand the doctors surgery. In addition, the schools will also likely be unable to cope with the number of new families. 1 Environmental. Those sites both flood in the winter months, the run off will impact both the proposed and existing housing estates. There are many wild birds and animals in that current habitat who will be displaced. The current vegetation also provides a buffer from the noise and pollution of the m4

	<p>1 Increased traffic and people into a village which is already is small.</p> <p>1 Why would you expect people to live in homes directly under huge electricity pylons and directly next to the m4? Would you? There are more viable sites. These are not practical.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Powell, Claire
<p>Consultee Full Name</p>	Mrs Claire Powell
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS889
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 10
<p>Chapter / Policy / Appendix Title</p>	Whitehart Meadow, Theale (Site Ref THE1)
<p>Order</p>	101
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	01/02/2023 16:38:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I live in <address redacted>.</p> <p>I am writing with deep concerns about the proposed developments of 40 and 60 new homes near my house, in the scrub land next to the M4.</p> <p>The views from the back of my property over <road redacted> have already been changed from lovely greenery to houses which now look into my back windows. Now I am worried about the impact from these new developments.</p> <p>First, the mini roundabout at the junction of the High Street and Hoad Way will have significantly more traffic, and will contribute much more noise to me - and to the old people who are residents of Elizabeth Court <comment redacted>. We already have too much traffic using the High Street on their way to the M4 and elsewhere. To the detriment of my health and wellbeing, this will cause more exhaust fumes and noise.</p> <p>Secondly, Theale Medical Centre is already in a parlous state. I won't go there any more <comment redacted>. In part this is obviously because they are under such huge strain that they simply cannot cope. It shows already. There is not an infinite stretch to the the capacity of infrastructure in our village, and it seems irresponsible of Council and builders to think of new housing if there is not commensurate responsibility to all the other needs, such as the Medical Centre, roads and schools.</p> <p>I register these points with the utmost concern for my own wellbeing and that of the village.</p> <p>I must oppose these new developments under the current circumstances.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	I must oppose these new developments under the current circumstances.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Townsend, James
Consultee Full Name	James Townsend
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS940
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>A) Specific to Whitehart Meadow site (RSA10)</p> <ol style="list-style-type: none"> 1 There is flood risk to this site. In the last Local Plan, this site was put forward and rejected due to this. Nothing has changed. 2 High voltage overhead power lines cross the site. In the last Local Plan, this site was put forward and rejected due to this. Previous site proposals including hotel, housing going back some 25 years have all been rejected in relation to this concern. Nothing has changed. 3 Noise and pollution from the motorway - this site is adjacent to the M4 and junction 12. In the last Local Plan, this site was put forward and rejected due to this. Nothing has changed. What's more, there is a need to preserve a gap between Theale and Calcot/Tilehurst which Whitehart Meadow provides. 4 The site has not been included in either the Air Quality Assessment or the Strategic Transport Model, meaning that the effect of traffic generated from the site has not been assessed. This is essential, given the current bottlenecks (mini-roundabout at East end of Theale high street; Woodfield Way and no "in and out" thoroughfare around the current housing estate with all traffic being forced through one entrance to the estate) <p>B) In combination with Old Sewage Works site (RSA11)</p> <ol style="list-style-type: none"> 1 A combined total of 100 homes is proposed for Theale <i>which is in addition to</i> the over 440 homes on the western side of Theale that are yet to be built but have been granted planning permission. 2 There are artificial deadlines which we know is why this plan is being rushed through. Yet the Local Plan Core Strategy says that "If this development [350 homes at Lakeside site] goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". No justification has been given as to why this requirement, still much needed, has not been carried forward into the Local Plan Review. 3 <i>Neither</i> site has been included in either the Strategic Transport Model or the Air Quality Assessment. 4 The proposed extra homes will put extra pressure on local health services that are already stretched to the limit. 5 Traffic from these two proposed sites puts huge pressure on the two mini-roundabouts at either end of Theale High Street making local road congestion even worse.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ambrose, Rosemary
Consultee Full Name	Mrs Rosemary Ambrose
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS858
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I have been a resident of Theale for 16 enjoyable years and wish to oppose this plan. There is only one surgery in Theale, one primary school and one secondary school. Today, I have seen a noticeboard from Croudace Group announcing building on greenfield near the A4 roundabout. Planning permission is for approximately 230 homes on this site. Please stop. Theale does not need more homes! The additional cars in the village will be dangerous as the High Street is quite narrow and 'near misses' do occur.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please stop. Theale does not need more homes!</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Capewell, Adam
Consultee Full Name	Dr Adam Capewell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS973
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to voice my concerns over the Local Plan that appears to include up to 200 extra homes being built in Theale.</p> <p>According to the plan an extra 100 houses could be built to the West of the village (policy RSA 9) and a further 100 houses to the East (policies RSA10 and RSA 11).</p> <p>This would be a notable increase in the amount of housing in Theale, and my biggest concern is that these extra homes would put significant extra pressure on local facilities, and in particular the local schools.</p> <p>I have lived in Theale for about <redacted> months, and have a <redacted> year old son. We applied for him to attend Theale Primary School when we moved here. However, we are continually told that there is no space for him due to over subscription at the school. Instead, we have to drive 5 miles each way to his old school in Ford's Farm in Calcot, meaning we are driving about 100 miles a week to take him to school and pick him back up.</p> <p>I do not see how having a further 200 families in the village is tenable, considering the likely extra number of school places that this would require. As our experience shows, there are not enough school places for even one extra family, let alone 200. I seriously doubt that the capacity of the school could be increased enough to accomodate the likely extra number of children in the village.</p> <p>I further note that the High Street already suffers from bad traffic congestion (which we have no choice but to drive through to take our son to school each day), and the increased housing would only make this significantly worse.</p> <p>Whilst I understand the need for extra housing, I would say that Theale is not a suitable place for them.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Painter, Ami
Consultee Full Name	Ms Ami Painter
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1087
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am submitting my objection to LPR RSA10 Whitehart Meadow, Theale – 40 properties, as part of the West Berkshire Local Plan Review 2022 – 2039.</p> <p>I am a current resident of <i><personal details removed></i> and I object to the plans on the following grounds:</p> <p><u>Your Vision:</u> 3.3 The development will negatively impact the infrastructure meaning it will not be sustainable either for the existing residents of Theale, or those who would be likely to settle in the new development if it were to be built. It will not foster community cohesion, health and wellbeing as it will blur the division of local areas between Theale and Calcot with the location of the site next to the M4, it will eliminate a natural area that people use to walk and exercise which will negatively impact the mental health of the existing residents who utilise this space.</p> <p><u>Strategic Objectives:</u> 7. Building on this site will not conserve or enhance the character or identity of the village. The village is already overpopulated, and this site would not be in keeping with the natural area where the land is located and would be detrimental to the rural feel of the village/community by becoming more brown land than green land which is already limited within this service centre.</p> <p><u>Infrastructure:</u> 4.2 The proposed development for this site is not a positive vision for the future. The impact to the village's infrastructure would be significant e.g. amenities such as the GP Surgery, Schools and high street facilities are already struggling to cope with the current population, without the additional proposed 200+ properties that are designated for Theale overall. This also contravenes the effective use of previously developed land. 4.12 The plans contravene the rural setting of Theale, as the additional development would reduce the rural space, negatively impacting the rural nature of the village. 4.19 The village does not need regenerating, as there already numerous areas of the village that have been redeveloped, as well as the growth of the commercial side of this service centre, with the upgrading of units within Arlington Business Park and the surrounding commercial areas near to the railway line. The site is also not an existing urban area which would be regarded as a more suitable location for future development. 4.20 This site does not meet the strategy's aim of making effective use of brownfield land. 4.30 Theale's infrastructure struggles to cope with key services and opportunities with the Primary school being relocated to a larger site, which reduced the open recreational green space of North Street playing fields, due to the demand on the school that the previous location could not support. There are no regular public transport links compared with other rural service centres, as the bus service is approx. every 30 minutes, with trains being the same if not marginally more frequently. Due to the location of the village and the lack of frequent public transport options, residents use their own vehicles, with most having a least 2 cars which causes an abundance of parking issues within the currently overpopulated residential areas of the village. 5.i. This development would not improve the wildlife habitat and species conservation in line with climate change. There are numerous types of wildlife living or frequenting the Whitehart Meadow, with deer and other such animals using the space from the local Englefield Estate. This is as well as red kites and other species of birds that nest and hunt in that area. 5.1 In response to climate change, if extreme weather events such as flash floods are a concern, this development would cause an issue as this area is a flood risk. The properties that run alongside the meadow already have to take flood risk into account when considering mortgages etc. and a development on this site would only increase that risk. This could make it harder for people to purchase existing homes in this area if the risk were deemed too high that it would create an issue for mortgages and making existing homes in the area depreciate in value and not viable to sell. The development would increase the number of people, properties and infrastructure at risk of flooding due to the reduction of the floodplain (section L) and would not mitigate flood risk but increase it. It would also exacerbate flooding problems on the proposal site and elsewhere as the flooding would increase in the recreational space between Whitehart Meadow and the old sewage works (RSA11 Former sewage treatment works, Theale). 5.28A The development would not fit into the life and texture of the village, nor would it be an improvement of the place. This is due to the significant impact on the infrastructure of the amenities of the village (as</p>

mentioned previously) as well as the highways infrastructure. There is already access issues at the M4 end of the High Street whereby traffic from junction 12 or any issues on the A4 cause a build-up and essentially block access to and from this end of the High Street and into the estates down Woodfield Way. This is already a significant concern with the lack of access for emergency vehicles for the residents in this area, as well as the abundance of street parking in that area where properties do not have adequate parking spaces and often narrow and limit easy access further into the estate.

5.30 The above also demonstrates how the development would contravene the practical use of the site by ensuring it is well connected, accessible, safe and easy for people to find, as it would not meet any of this criteria based on the location being at a dead end with a severe pinch point when traffic both through the High Street and on the A4/junction 12 are at its peak.

Landscape Character:

C: The development in conjunction with that planned for the old sewage works is not in context of the existing settlement. If the 2 sites were to go ahead, the developments would envelop the existing recreational space that would be left on Woodfield Way, effectively strangling the only remaining open land at the M4 side of the village. This would adversely affect the conservation (5.36) of the site in addition to being at odds with West Berkshire Council's plan of keeping the recreational space between the 2 proposed sites as a wildflower meadow to encourage wildlife habitation.

5.42 This development would not retain an actual or perceived visual break in settlements, as the residential areas of the village would populate the land up to the M4 and would not be a distinguished break between where Theale ends and the Calcot boundary starts. It would also eliminate the 'green routes' (F) used to commute or travel on foot or cycle, where residents use the meadow to walk through to access the only footpath to cross the M4.

Green infrastructure G: the development would not improve biodiversity and increase natural capital as it would displace many animals that use the meadow as their habitat, as well as obliterating West Berkshire Council's desired extension of wildlife corridors to provide habitat connectivity.

5.64 The planned development at this site does not meet the Council's commitment for strengthening local and strategic green infrastructure across the district for the benefit of the natural environment and health and wellbeing of the community. It reduces the green space and also areas for residents to exercise in and take time away from the built-up urban areas of the village.

Nationally Designated Sites:

There are suitable alternative sites with lesser impacts than proposed with the development on Whitehart Meadow. There is already a site at the end of the village at The Green/A4 junction which has planning permission for 100 units which would negate the need to build a development in restricted areas at the opposite end of the village.

5.70 The development on Whitehart Meadow would significantly reduce the buffer zone landscape feature protecting the residents from the M4 corridor. Residents along Woodfield Way and adjacent roads already experience an issue with air quality and noise from the M4. A development closer to the M4 would increase the effects experienced with black soot and dust being a common build-up in homes along Woodfield Way from the heavy motorway traffic, as well as the noise experienced from the motorway and roadworks that consistently take place at junction 12.

5.80 This development would destroy an irreplaceable habitat.

Policy SP 11

This development would not provide or retain an appropriate buffer zone between development proposals and designated sites. Both in terms of existing properties, and the planned development of the old sewage works next to Whitehart Meadow.

5.67 The development would not promote conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and would not secure opportunities for a net gain for biodiversity.

6.4 Although collaborative working between West Berkshire Council, Wokingham Borough, Reading Borough and Bracknell Forest Councils can support local residents, it is having a detrimental impact to Theale with this planned development. If RBC have a shortfall of properties in their district, it should not mean that the required properties should be forced upon neighbouring areas which would lead to a detrimental impact on that area, its amenities and overall infrastructure. Theale should not have to bear the brunt of the failings of RBC's Reading Local Plan within their own district.

6.8 If no shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire HMA have been identified, Theale should not be negatively affected by the developments proposed in order to satisfy the failings of other Councils, especially when there hasn't been a housing need/crisis identified in Theale specifically. This development would not serve local people and would only encourage residents to move in from surrounding areas, putting further pressure on the highways network, the limited public transport links, as well as local amenities that are already stretched beyond capacity. This would also not enhance or deepen the existing bonds in the community and could cause resentment from existing residents both in terms of the development taking place as well as towards the residents who may not be local to the area or contribute to immediate community.

6.73 This development contravenes the approach of the Council supporting the development of housing schemes that are initiated by local communities, as this site has not been initiated by local communities as an area for development that would benefit the village, landscape or community.

Town and District Centres: This develop would contravene the following principles that the development should:

- Not have an adverse impact on the safety and capacity of the local highway network; and
- Not have an adverse impact on local amenity.

As it would create both.

7.52 This development would not be supported by adequate and appropriate infrastructure. The GP Surgery is already oversubscribed and cannot cope with the current level of patients. The amenities in the High Street are not adequate for the current number of residents in Theale. The parking is restricted, there are no longer any Banks, the pharmacy constantly under performs due to the pressures of struggling to fulfil orders based on the over subscription of patients at the GP Surgery, as well as the highways network struggling due to the number of residents as well as those commuting through Theale to the larger areas of Newbury and Reading where Theale sits in between.

This development would place undue burdens on the existing infrastructure and facilities.

Environmental Nuisance and Pollution Control:

The development would create an unacceptable increase in pollution, including from light, noise, dust, vibration and/or odour. It would also cause noise or vibrations of a level which would disturb areas that are valued for their tranquillity in terms of recreation or amenity.

10.45 Where the trees have been cut down already in Whitehart Meadow, this has now exposed Woodfield Way and surrounding streets to higher levels of light and noise pollution where the natural buffer has been removed. If a development were to be built on this site, it would increase the light and noise pollution as well as being an impact on those residents who would be living closer to the M4 and pylon.

Water Framework: Woodfield Way and the surrounding roads already suffer from poor wastewater treatment and water resources. There is often Thames Water working on the water station based in Alderfield Close, as well as regularly having to work on drains etc. along Woodfield Way. During extremes of weather in the summer, the water pressure dropped so severely that residents experienced issues with pipes rattling and air blocks where the infrastructure could not cope with the hose pipe ban and reduced water pressure levels with the existing numbers of residents/properties in the village.

Policy DM 8

Trees, woodlands and hedge rows:

There does not seem to be an exceptional circumstance for the loss or deterioration of protected trees, groups of trees, woodland or important hedgerows for this development.

Residential Amenity:

The development would cause unacceptable harm to existing residential dwellings in terms of the following criteria:

- Significant loss of daylight and/or sunlight to land and buildings;
- Significant overlooking of land and buildings that results in a harmful loss of privacy;
- Development resulting in an undue sense of enclosure, overbearing impact, or a harmful loss of outlook; and
- Noise, dust, fumes and odours.

Additional Comments:

The development would create further parking issues in Theale and would negatively impact existing residents would already experience problems with the roads and highways infrastructure in Theale.

The development would also create a burden in relation to the AWE 12km consultation zone for both the Aldermaston and Burghfield sites. The additional residents that would fall within this zone as a result of the development would create an unsafe environment within an already precarious position given the locality of the AWE sites to Theale.

In summary:

- Flood risk
- High voltage overhead power lines cross the site
- Noise and pollution from the motorway
- Possible land contamination
- Need to preserve the gap between Theale and Calcot/Tilehurst
- Impact on the Area of Outstanding Natural Beauty
- Risk from fluvial, surface water and ground water flooding
- Impact on the Theale High Street Conservation Area
- Impact on surrounding housing
- Impact on infrastructure and amenities

The objections I have stated above would also apply to my objections for RSA11 Former sewage treatment works, Theale planned development.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Josey, Naomi
Consultee Full Name	Naomi Josey
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1575
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am in objection to the proposed sites in Theale in the West Berkshire Local Plan Review, this being the 40 homes on Whitehart Meadow and 60 homes on the old Theale Sewage Works for the following reasons:</p> <p>The impact of additional traffic on the village. The proposed access route is a major route used by pedestrians to access the footbridge over the motorway. Additional traffic will raise risks to pedestrians, particularly school children. The high street is narrow and already ill-equipped to deal traffic. The junction is already busy due to its proximity to the motorway, business parks and the A4.</p> <p>The impact on the estates that will be adjacent to the developments – Woodfield Way, Rotherfield Close, Alderfield Close, Blossom Avenue, Blossom Lane etc, resulting in an impact on view, traffic through the local area. This is currently predominately a residential area and this development will impact on the living standards of existing residents. Blossom Lane is a narrow and very quiet road, construction traffic and eventual residents cars would cause risks to pedestrians and inconvenience to all.</p> <p>The development will reduce the protective barrier between their homes and the motorway.</p> <p>The negative impact on working standards in regard to the new development being in extremely close proximity to the overhead power lines and the motorway, leading to poor air quality, noise pollution and poor working environments.</p> <p>The environmental impact on the wildlife that currently lives in the area including deer.</p> <p>The visual impact of the structure will affect the outlook of the village on approach.</p> <p>There are already two approved areas of development in Theale (The Green and The Lakeside site) resulting in the potential building of 400+ homes. The facilities in Theale including the Medical Centre and the School are already under strain. Currently there are wait times of up to 3 weeks for a GP appointment and 45 minutes plus on the phone to try and get a duty appointment. It needs to be considered that this is before the building of the proposed 400+ homes, adding another 100 homes, plus a proposed large site of 1500 between Theale and Thatcham will add huge stress to these services and traffic to the area.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Painter, Carrie
Consultee Full Name	Carrie Painter
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS963
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 20:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am submitting my objection to LPR RSA10 Whitehart Meadow, Theale – 40 properties, as part of the West Berkshire Local Plan Review 2022 – 2039.</p> <p>I am a previous resident of <redacted> and I object to the plans on the following grounds:</p> <p><u>Your Vision:</u> 3.3 The development will negatively impact the infrastructure meaning it will not be sustainable either for the existing residents of Theale, or those who would be likely to settle in the new development if it were to be built. It will not foster community cohesion, health and wellbeing as it will blur the division of local areas between Theale and Calcot with the location of the site next to the M4, it will eliminate a natural area that people use to walk and exercise which will negatively impact the mental health of the existing residents who utilise this space.</p> <p><u>Strategic Objectives:</u> 7. Building on this site will not conserve or enhance the character or identity of the village. The village is already overpopulated, and this site would not be in keeping with the natural area where the land is located and would be detrimental to the rural feel of the village/community by becoming more brown land than green land which is already limited within this service centre.</p> <p><u>Infrastructure:</u> 4.2 The proposed development for this site is not a positive vision for the future. The impact to the village's infrastructure would be significant e.g. amenities such as the GP Surgery, Schools and high street facilities are already struggling to cope with the current population, without the additional proposed 200+ properties that are designated for Theale overall. This also contravenes the effective use of previously developed land.</p> <p>4.12 The plans contravene the rural setting of Theale, as the additional development would reduce the rural space, negatively impacting the rural nature of the village.</p>

4.19 The village does not need regenerating, as there already numerous areas of the village that have been redeveloped, as well as the growth of the commercial side of this service centre, with the upgrading of units within Arlington Business Park and the surrounding commercial areas near to the railway line. The site is also not an existing urban area which would be regarded as a more suitable location for future development.

4.20 This site does not meet the strategy's aim of making effective use of brownfield land.

4.30 Theale's infrastructure struggles to cope with key services and opportunities with the Primary school being relocated to a larger site, which reduced the open recreational green space of North Street playing fields, due to the demand on the school that the previous location could not support. There are no regular public transport links compared with other rural service centres, as the bus service is approx. every 30 minutes, with trains being the same if not marginally more frequently. Due to the location of the village and the lack of frequent public transport options, residents use their own vehicles, with most having a least 2 cars which causes an abundance of parking issues within the currently overpopulated residential areas of the village.

5.i. This development would not improve the wildlife habitat and species conservation in line with climate change. There are numerous types of wildlife living or frequenting the Whitehart Meadow, with deer and other such animals using the space from the local Englefield Estate. This is as well as red kites and other species of birds that nest and hunt in that area.

5.1 In response to climate change, if extreme weather events such as flash floods are a concern, this development would cause an issue as this area is a flood risk. The properties that run alongside the meadow already have to take flood risk into account when considering mortgages etc. and a development on this site would only increase that risk. This could make it harder for people to purchase existing homes in this area if the risk were deemed too high that it would create an issue for mortgages and making existing homes in the area depreciate in value and not viable to sell.

- 1 The development would increase the number of people, properties and infrastructure at risk of flooding due to the reduction of the floodplain (section L) and would not mitigate flood risk but increase it. It would also exacerbate flooding problems on the proposal site and elsewhere as the flooding would increase in the recreational space between Whitehart Meadow and the old sewage works (RSA11 Former sewage treatment works, Theale).

5.28A The development would not fit into the life and texture of the village, nor would it be an improvement of the place. This is due to the significant impact on the infrastructure of the amenities of the village (as mentioned previously) as well as the highways infrastructure. There is already access issues at the M4 end of the High Street whereby traffic from junction 12 or any issues on the A4 cause a build-up and essentially block access to and from this end of the High Street and into the estates down Woodfield Way. This is already a significant concern with the lack of access for emergency vehicles for the residents in this area, as well as the abundance of street parking in that area where properties do not have adequate parking spaces and often narrow and limit easy access further into the estate.

5.30 The above also demonstrates how the development would contravene the practical use of the site by ensuring it is well connected, accessible, safe and easy for people to find, as it would not meet any of this criteria based on the location being at a dead end with a severe pinch point when traffic both through the High Street and on the A4/junction 12 are at its peak.

Landscape Character:

C: The development in conjunction with that planned for the old sewage works is not in context of the existing settlement. If the 2 sites were to go ahead, the developments would envelop the existing recreational space that would be left on Woodfield Way, effectively strangling the only remaining open land at the M4 side of the village. This would adversely affect the conservation (5.36) of the site in addition to being at odds with West Berkshire Council's plan of keeping the recreational space between the 2 proposed sites as a wildflower meadow to encourage wildlife habitation.

5.42 This development would not retain an actual or perceived visual break in settlements, as the residential areas of the village would populate the land up to the M4 and would not be a distinguished break between where Theale ends and the Calcot boundary starts. It would also eliminate the 'green routes' (F) used to commute or travel on foot or cycle, where residents use the meadow to walk through to access the only footpath to cross the M4.

Green infrastructure G: the development would not improve biodiversity and increase natural capital as it would displace many animals that use the meadow as their habitat, as well as obliterating West Berkshire Council's desired extension of wildlife corridors to provide habitat connectivity.

5.64 The planned development at this site does not meet the Council's commitment for strengthening local and strategic green infrastructure across the district for the benefit of the natural environment and

health and wellbeing of the community. It reduces the green space and also areas for residents to exercise in and take time away from the built-up urban areas of the village.

Nationally Designated Sites:

There are suitable alternative sites with lesser impacts than proposed with the development on Whitehart Meadow. There is already a site at the end of the village at The Green/A4 junction which has planning permission for 100 units which would negate the need to build a development in restricted areas at the opposite end of the village.

5.70 The development on Whitehart Meadow would significantly reduce the buffer zone landscape feature protecting the residents from the M4 corridor. Residents along Woodfield Way and adjacent roads already experience an issue with air quality and noise from the M4. A development closer to the M4 would increase the effects experienced with black soot and dust being a common build-up in homes along Woodfield Way from the heavy motorway traffic, as well as the noise experienced from the motorway and roadworks that consistently take place at junction 12.

5.80 This development would destroy an irreplaceable habitat.

Policy SP 11

This development would not provide or retain an appropriate buffer zone between development proposals and designated sites. Both in terms of existing properties, and the planned development of the old sewage works next to Whitehart Meadow.

5.67 The development would not promote conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and would not secure opportunities for a net gain for biodiversity.

6.4 Although collaborative working between West Berkshire Council, Wokingham Borough, Reading Borough and Bracknell Forest Councils can support local residents, it is having a detrimental impact to Theale with this planned development. If RBC have a shortfall of properties in their district, it should not mean that the required properties should be forced upon neighbouring areas which would lead to a detrimental impact on that area, its amenities and overall infrastructure. Theale should not have to bear the brunt of the failings of RBC's Reading Local Plan within their own district.

6.8 If no shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire HMA have been identified, Theale should not be negatively affected by the developments proposed in order to satisfy the failings of other Councils, especially when there hasn't been a housing need/crisis identified in Theale specifically. This development would not serve local people and would only encourage residents to move in from surrounding areas, putting further pressure on the highways network, the limited public transport links, as well as local amenities that are already stretched beyond capacity. This would also not enhance or deepen the existing bonds in the community and could cause resentment from existing residents both in terms of the development taking place as well as towards the residents who may not be local to the area or contribute to immediate community.

6.73 This development contravenes the approach of the Council supporting the development of housing schemes that are initiated by local communities, as this site has not been initiated by local communities as an area for development that would benefit the village, landscape or community.

Town and District Centres: This develop would contravene the following principles that the development should:

- Not have an adverse impact on the safety and capacity of the local highway network; and
- Not have an adverse impact on local amenity.

As it would create both.

7.52 This development would not be supported by adequate and appropriate infrastructure. The GP Surgery is already oversubscribed and cannot cope with the current level of patients. The amenities in the High Street are not adequate for the current number of residents in Theale. The parking is restricted, there are no longer any Banks, the pharmacy constantly under performs due to the pressures of struggling to fulfil orders based on the over subscription of patients at the GP Surgery, as well as the highways network struggling due to the number of residents as well as those commuting through Theale to the larger areas of Newbury and Reading where Theale sits in between.

This development would place undue burdens on the existing infrastructure and facilities.

Environmental Nuisance and Pollution Control:

The development would create an unacceptable increase in pollution, including from light, noise, dust, vibration and/or odour. It would also cause noise or vibrations of a level which would disturb areas that are valued for their tranquillity in terms of recreation or amenity.

10.45 Where the trees have been cut down already in Whitehart Meadow, this has now exposed Woodfield Way and surrounding streets to higher levels of light and noise pollution where the natural buffer has been removed. If a development were to be built on this site, it would increase the light and noise pollution as well as being an impact on those residents who would be living closer to the M4 and pylon.

Water Framework: Woodfield Way and the surrounding roads already suffer from poor wastewater treatment and water resources. There is often Thames Water working on the water station based in Alderfield Close, as well as regularly having to work on drains etc. along Woodfield Way. During extremes of weather in the summer, the water pressure dropped so severely that residents experienced issues with pipes rattling and air blocks where the infrastructure could not cope with the hose pipe ban and reduced water pressure levels with the existing numbers of residents/properties in the village.

Policy DM 8

Trees, woodlands and hedge rows:

There does not seem to be an exceptional circumstance for the loss or deterioration of protected trees, groups of trees, woodland or important hedgerows for this development.

Residential Amenity:

The development would cause unacceptable harm to existing residential dwellings in terms of the following criteria:

- Significant loss of daylight and/or sunlight to land and buildings;
- Significant overlooking of land and buildings that results in a harmful loss of privacy;
- Development resulting in an undue sense of enclosure, overbearing impact, or a harmful loss of outlook; and
- Noise, dust, fumes and odours.

Additional Comments:

The development would create further parking issues in Theale and would negatively impact existing residents would already experience problems with the roads and highways infrastructure in Theale.

The development would also create a burden in relation to the AWE 12km consultation zone for both the Aldermaston and Burghfield sites. The additional residents that would fall within this zone as a result of the development would create an unsafe environment within an already precarious position given the locality of the AWE sites to Theale.

In summary:

- Flood risk
- High voltage overhead power lines cross the site
- Noise and pollution from the motorway
- Possible land contamination
- Need to preserve the gap between Theale and Calcot/Tilehurst
- Impact on the Area of Outstanding Natural Beauty
- Risk from fluvial, surface water and ground water flooding
- Impact on the Theale High Street Conservation Area
- Impact on surrounding housing
- Impact on infrastructure and amenities

The objections I have stated above would also apply to my objections for RSA11 Former sewage treatment works, Theale planned development.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

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

- * Yes
- * No

5. Independent Examination

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Church, Joanna
Consultee Full Name	Joanna Church
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1096
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/01/2023 13:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to object to planning on whitehart meadows and theale sewage works for the following reasons: Whitehart Meadows: More than anything over populating the village that is on it's knees already with trying to get doctors appointments and the new built school cannot take much more.this area suffers flooding, overhead power lines and a lot of wildlife live here. Adding to the traffic won't help either. Over all there is already planning given to 400 odd houses in theale and on top of that windfall sites . This village is struggling to cope as it is and to add anymore would cripple it. I have not seen any plans to make the surgery bigger for the planning already permitted. This village will be ruined and no one will want to live here if its expanded from a lovely village to an ugly town that cannot cope.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Watson, Ken
Consultee Full Name	Dr and Mrs Ken & Rebecca Watson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1785
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We are writing to you regarding the proposed plan to build 60 homes on the Old Sewage works in Theale - RSA11 and to build 40 homes on Whitehart Meadow - immediately next to the Old Sewage Works.</p> <p>We live on <redacted> and are very concerned regarding access to this number of properties via this road. The road already struggles with the number of vehicles using it, given it is essential a single carriageway due to the parking. Similarly the pathways are thin and sometimes disappear entirely, making it unsuitable for greater numbers of people to try and walk down. Access to the centre of the village from Blossom Lane involves a complex junction with a mini-roundabout which is often used incorrectly, and the road surface through the high street, and the far end of Blossom Lane leading to Englefield Road both suffer from road damage, leading to dangerous pot holes. If these roads were to be used increasingly we'd need to see a better level of upkeep and substantial changes to the roads i.e. making them wider, which isn't possible given the need for parking.</p> <p>The actual site proposed seems highly unsuitable for major development given the proximity to the M4, which cause issues of air and noise pollution. Plus there is the presence of multiple pylons, which seems highly unsafe - how would the presence of these be mitigated for people's safety, particularly children? The area is also currently an undeveloped site. It's full of wildlife, and we can't understand how it would be deemed ok to destroy this. We recently also learned the area is potentially contaminated due to the previous use of the site for sewage works. Again, this seems unsafe and that it would require undue workarounds to make sure foundations could be built. Finally, the area proposed is known as a high risk area for flooding. Given the increased likelihood of flooding when you take away trees and add in tarmac and other non-soluble surfaces, the likelihood of flooding is only going to get worse. Last year we experienced intense rainfall which caused areas of Blossom Lane to flood.</p> <p>Crucially there doesn't seem to be any plan for how Theale will be able to serve this level of new people. The medical centre has struggled over the winter and the pharmacy often has long queues. Similarly, has the influx of people been considered for the local schools and other services. At the moment there would be no access for buses to serve the new development, making it a lengthy walk for anyone wanting to use it. Given the issues regarding the pavements this would be totally unsuitable, particularly for people with additional needs such as wheelchair users and people with prams/pushchairs.</p> <p>Lastly, it's important to remember that Theale is a village, which is currently managing to retain a village community and spirit. To build 100 new homes on these sites would bring such a high number of people all at once, it seems a major threat. Making Theale just another suburb of Reading rather than the village all of the current residents enjoy and love.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1789
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	Yes

delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1837
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>This site is partly in Flood Zone 2. Main river along site boundary. The site is on secondary A superficial and principal bedrock aquifer</p> <p>We support the limitation of development to Flood Zone 1 on this site as this is in line with the sequential approach to development.</p> <p>The Sulham brook which runs along the site is a main river and a headwater and is home to Brown Trout and Bullhead that makes it more ecologically important, therefore apart from the provision of a 10m buffer, an ecological assessment should be provided and approved before planning permission is granted. This should be included in the policy wording.</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1439
Chapter / Policy / Appendix Number	Policy RSA 10
Chapter / Policy / Appendix Title	Whitehart Meadow, Theale (Site Ref THE1)
Order	101
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	PS1439 Cllr Alan Macro attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Section 4.35 of the Core Strategy contained the following statement: "The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". Housing construction on this development has not yet commenced, although Outline permission has been granted for up to 325 homes and Reserved Matters permission has been granted for part of the site. In addition, outline permission has been granted for 104 homes on the adjacent site between The Green and the A340 (LPR site RSA9). These two sites will increase the number of homes in Theale by almost 25% when built out.</p> <p>Therefore, that statement is still valid and no justification has been given for not carrying that section forward to the LPR.</p> <p>Theale still needs that "period of consolidation".</p> <p>This site is important to the setting of Theale and to its maintenance as a separate settlement. Any development on this site would erode Theale's separation from Calcot and Tilehurst, contrary to the requirement in policy SP1 that "the individual identities of the separate settlements within this [Eastern Spatial] area will be maintained"</p> <p>The site is bounded by the M4 motorway and the elevated A4. Thus, residents on the site would be subject to significant noise and air pollution. The latter is exacerbated in the morning peak because the M4 eastbound frequently slows to a crawl or standstill past this site. This worsens air pollution because:</p> <ul style="list-style-type: none"> • The density of vehicles increases as they close up, producing more pollution in a given length of road • Vehicle engines produce more pollution when idling or running slowly • The pollution does not disperse so widely because it is not dispersed by moving traffic. <p>High voltage power lines cross the site. In addition to visual intrusion and danger of electrocution (e.g. from climbing ladders or scaffolding or from flying kites), scientific research shows that they generate ozone and nitrogen oxide air pollution (increased by 13% and 30% over normal levels according to paper "Emissions of</p>

	<p>pollutants and air quality in the area of influence of high voltage overhead electrical lines" by Cociorva Danut, Mihaela Andreea Mitiu and Natalia Raischi: <Hyperlink removed - see attachment> would add to the pollution to residents on the site caused by traffic on the M4 and Theale Bypass</p> <p>The site suffers from groundwater flood risk and much of it is in flood zone 2</p> <p>High groundwater levels (25cm blow ground level according to the Drainage Officer's comment in the HELAA) preclude infiltration as a SUDS solution.</p> <p>The site is the source of the Sulham Brook and the high peat content of its soil attenuates surface water run-off into the brook. Any development of the site would significantly reduce this attenuation and increase the flood risk downstream (the brook flooded part of Pangbourne in 2007).</p> <p>Traffic generated from housing on the site would contend with the traffic from the congested High Street at the Hoard Way Junction and with that on the busy A4, particularly in the morning peak. This would add to congestion in the High Street, at the Hoard Way/A4 roundabout and at M4 J12. It would also exacerbate traffic problems elsewhere in the highway network in Theale as described in the comments on Policy SP14</p> <p>The use identified in the HELAA is "Employment uses (B2/B8)". Residential use is therefore contrary to policy SP1 of this plan which states that "allocations will be related to the role and function of settlements and the development opportunities identified through the HELAA".</p> <p>The reasons for removing this site from the Housing Site Allocations DPD are still valid: The site was assessed in the 2013 Strategic Housing Land Availability Assessment (HELAA site ref was THE002) as 'potentially developable'. The site was subsequently assessed in more detail during the preparation of the Housing Site Allocations Development Plan Document, whereby the site was not recommended for allocation due to the location of the site adjacent to the M4 (and resultant noise and air quality issues), and the location of a pylon in the centre of the site.</p> <p>In addition, the Environment Agency strongly recommended that the site was not allocated due to majority of it being in Flood Zone 2. A sequential test would have been required to allocate the site in the Housing Site Allocations Development Plan Document. Other suitable sites with a lower risk of flooding were not available in Theale and across the district, so the Council would have been unable to carry out the sequential test.</p> <p>The site is not included in the West Berkshire Strategic Traffic Model, meaning that the model is not accurate and that the effect of traffic generated from this site has not been assessed.</p> <p>The site is not included in the Air Quality Assessment, meaning that the Assessment is not accurate</p> <p>The subsoil has a high peat content. Peat is a major store of carbon. Excavation of the soil would therefore release CO2 into the atmosphere and exacerbate climate change. This would be contrary to policy SP5 of this LPR</p> <p>This site is very close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which makes the site not sustainable</p> <p>Site RSA10 is missing from the table [Air Quality Report Table 8-13] SA/SEA App 7, 9b, 5b</p> <p>9 (b) The proposal would NOT sustainably manage flood risk as the loss of attenuation of surface water entering the Sulham Brook caused by removal of peat subsoil during construction will increase flood risk to properties downstream</p> <p>3 (a) The policy would NOT improve access to education, health and other services as local healthcare and primary education services are already over subscribed</p> <p>5(b) The proposal would NOT conserve and enhance the character of the landscape as it would:</p> <ul style="list-style-type: none"> • Change the setting of Theale from a green field to a housing estate • Erode the gap between Theale and Calcot/Tilehurst
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>This site should be removed from the LPR</p> <p>Site RSA10 should be included in the Transport Modelling</p> <p>Site RSA10 should be included in the Air Quality Assessment and the table</p> <p>The effects of the policy objectives should be changed from positive to negative.</p> <p>The cumulative impact of the policy should be changed to negative</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain to the inspector why the Core Strategy policy should be carried forward and implemented</p> <p>To explain why the site should have been included in the Transport Model</p>

	<p>To explain why it is important for the site to be included in the Air Quality Assessment</p> <p>To explain why development of this site would be unsustainable</p> <p>To explain why the sustainability impact of the policy is negative</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy RSA 11 Former Theale Sewage Treatment Works, Theale (Site Ref THE7)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Francis, Jamie
Consultee Full Name	Jamie Francis
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS49
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 18:57:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am emailing to object to the proposed building of further homes in theale village. There is not the infrastructure to support this at all in terms of doctors, dentists or schooling. The roads cannot cope with the volume of traffic as it stands, let alone the increase that these proposed houses would bring.</p> <p>I would be very concerned that anymore homes built in theale would be damaging to the village.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Way, Joelle
<p>Consultee Full Name</p>	Joelle Way
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS33
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 11
<p>Chapter / Policy / Appendix Title</p>	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
<p>Order</p>	103
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	E-Mail

* Web * Unknown	
Response Date	06/02/2023 17:03:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	<p>I would also like to add on the follow reasons to object the proposed work in Theale (Plan Review 2022-19) - 40 homes on Whitehart Meadow. Whitehart Meadow is the area of land between the Woodfield Way estate and the M4 and 60 homes on the site of the old Theale sewage works. This would be off the end of Blossom Lane.</p> <p>I live very close to the proposed sites, and I am very concerned these developments would heavily impact the environmental and ecological habitats and animals that occupy these areas. There are herds of deer who regular use that area, along with the everyday British wildlife species we are so lucky to have</p>

	<p>in Theale. Also, Theale is a small countryside looking town and that is what makes the area so beautiful and appealing, building an extra 100 homes would not look good for the small town Theale currently provides and even more of a reason against it is that Theale village would not be able to cope with the increased pressures to the public services, food demands, parking spaces etc. I am very against these developments from being built and I wish the plans would be dropped and we can enjoy appreciating the greenspace and wildlife we still thankfully have. Furthermore, the ground is already a concerning flood risk zone and should be excluded from any future developments as it is not safe or stable due to ground conditions.</p> <p>The 100 homes proposed for Theale would be on top of over 440 homes on the western side of Theale that have been given planning permission but not yet built.</p> <p>The proposed extra homes for Theale will put extra pressure on local health services that are already stretched to the limit.</p> <p>Traffic from the proposed extra homes in Theale, in conjunction with that generated by the north east Thatcham site, will make local road congestion worse.</p>
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ferrier, Sally
Consultee Full Name	Sally Ferrier
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS42
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2023 18:22:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I'm responding to the proposed Local Plan review consultation for 2022-39. My name is <name redacted>, I live at <address redacted>. My main concern is the Theale area. "- 40 houses built on Whitehart Meadow - the area of land between the Woodfield Way estate and the M4. - 60 houses built on the site of the old sewage works, off Blossom Lane - 1,500 houses built on the Theale side of Thatcham." At least 50% of each of these if they are approved MUST be social housing. This is the biggest need in our increasingly unaffordable area. These social and maybe 5% affordable homes shouldn't just be flats either! Just because people can't afford to stay in their village doesn't mean they don't want a garden or basic things many people take for granted. It's a village, they are green and plentiful, NO PLACE for flats. My own social home is a maisonette and gives everyone outside space and a garage and is an ideal fit for the village if inspiration is needed. My next concerns is the doctors surgery and schools that are very over subscribed as it is. We would need them making larger & an NHS dentist in the area. Theale already has a bad smell of sewage outside the new Red Lion Flat development on the Englefield road/church street junction. The flats at Leonard court/Elizabeth court already have sewage issues so Theale's entire village will need its sewage waste pipes upgraded and enlarged.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Off the back of this we have already got several hundred houses coming to the village maybe they need to be the "Guinea pig" and in 5 years after they have been built a new review for Theale can take place to see if they can even cope with those?
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holland, Alex
Consultee Full Name	Mr Alex Holland
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS80
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/01/2020 23:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing in opposition of the planned development in Northeast Thatcham.</p> <p>As a resident of Chapel Row, I am extremely concerned about the increase in the volume of traffic that would be generated along the Avenue and down Hatch lane, with commuters seeking ways to the A4 and onwards.</p> <p>The traffic is already heavy in this area.</p> <p>The traffic is generating a situation where children are walking to their school buses, with no street paths or streetlights, so walking in the road with their torches. Combining this with an increase of commuters rushing to work in their cars. Is a very clear accident waiting to happen. Which will result in a child being seriously injured or killed.</p> <p>The proposed extra houses would see more commuters seeking a route to the A4 via Hatch Lane, and thus increasing the probably of this accident happening.</p> <p>For this reason, I don't think the council should support this development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holland, Alex
Consultee Full Name	Mr Alex Holland
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS81
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 11:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I strongly object to the proposed planning application that has been submitted in theale (whitehouse meadow and the old sewage works) as I don't believe theale can cope with it.</p> <p>Myra it will be good for the local businesses (shops / pubs etc) however I don't believe that the village can deal with this amount of building work.</p> <p>Firstly it's difficult enough to get an appointment at the local doctors surgery and if you add another 100 homes to the equation it will be near on impossible.</p> <p>Secondly I don't think the schools will be able to deal with it either.</p> <p>Thirdly the amenities in the village struggle from time to time and by adding more homes in the village then this will only get worse.</p> <p>My fourth point is that traffic in the village can be a nightmare at the best of times and by adding another 100 homes to this then the problem will only increase.</p> <p>My fifth point is that the 2 proposed sites both flood and are also homes to local wildlife.</p> <p>My sixth concern is that by building this there will be no boundaries between Theale and Calcot.</p> <p>My seventh concern is the overhead power lines that run across both proposed sites, will this be safe?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Clifton, Mari
Consultee Full Name	Mari Clifton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS99
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	30/01/2023 17:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Please find my objections for the proposed planning of 40 homes on whitehart meadow and 60 homes on the old Theale sewage works.</p> <ul style="list-style-type: none"> • The already very over stretched facilities in the village inc the schools , medical centre surgery , chemist, dentist, facilities for young people. • Traffic that over 500 vehicles will cause to already congested very narrow roads. inc the 400 + homes that already have planning approval. • Congestion of traffic in the high st which has parking on both sides and is gridlocked when buses are trying to get past delivery lorries. • The A4 is very busy and the amount of traffic already using it is gridlocked during the rush hour. • The extra traffic due to the building of homes in Newbury and thatcham. • The negative affect to the local environment, air pollution , green spaces and wildlife. • This would be on top of over 400 homes that already has approval and will be terrible for the small community village of Theale. • There are very little facilities for young people which will encourage them to wander around the village in groups which is very disconcerting for people walking alone.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bahrani, Laith
Consultee Full Name	Laith Bahrani
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS112
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	15/02/2023 16:36:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Re: Local Plan – RSA11 Old Sewage Works, Theale</p> <p>As a resident of Theale village I wish to formally register vehement objection to the proposed local plan referenced above which raises many serious concerns with respect to its impact on the village of Theale, the residents of the village, and the wider area.</p> <p>A non-exhaustive list of objections is presented as follows:</p> <p>Conservation Area The area, or access roads within the area, fall within a designated Conservation Area and setting, and is thus subject to protection as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as per Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act and as designated under Article 50 of the Planning (NI) Order 1991.</p> <p>Conservation Areas are also notable for their biodiversity value. Protected species and habitats need to be addressed when reviewing buildings, sites and planning works. See further point on Destruction of wildlife habitat and protected species.</p> <p>In addition, trees in a Conservation Area are automatically protected as if a Tree Preservation Order (TPO) was in place.</p> <p>Invasion of privacy of Theale residents The overlook that will result from any development will pose serious privacy issues especially for the properties surrounding the proposed site. As per Article 8 of the Human Rights Act states a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.</p> <p>Agricultural Land Classification (ALC) Natural England records that the proposed site is grade 3 ALC and thus the land should protected from development under the government policies and legislation to preserve the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals.</p> <p>Flood Risk, Ground Stability and Drainage The Environment Agency designates areas of the proposed site as at RISK from surface water flooding. The eradication of natural ground absorption inherent to this proposal will heighten this risk status for Theale village and adversely affect the foundational integrity of nearby properties and subsequently elevate Home & Buildings insurance premium rates for the surrounding area.</p> <p>Destruction of wildlife habitat and protected species The destruction of habitation required for this development would lead to a further decline in wildlife species such as deer, rabbit, birds, bats and hedgehogs. Hedgehogs are listed as a Species of Principle Importance in England under the Natural Environment and Rural Communities (NERC) Act 2006 Section 41 making hedgehogs a material consideration for Local Planning Authorities (LPAs) during the planning process.</p> <p>Highway safety, inadequate parking and access Theale village is already vastly strained with traffic and parking issues; this proposal will only serve to escalate these issues and stands in direct contradiction with both government and local council policies on congestion and pollution alleviation. Parking facilities in Theale are already oversubscribed and the proposed development would lead to an increase in traffic, congestion and parking issues correlating inversely with a decrease in highway safety.</p> <p>Pylons The site is unsuitable as it encompasses high voltage overhead power lines.</p> <p>Contamination The site is unsuitable as it is contaminated from its prior use processing sewage.</p> <p>Noise/Air/Light/Visual Pollution The development will increase noise, air, light and visual pollution in Theale village both during and post-construction.</p> <p>The proposed site has not been included in either the Strategic Transport Model or the Air Quality Assessment.</p> <p>Loss of natural light</p>

	<p>The proposed development is in extremely close proximity to numerous residential properties that have benefited from natural space and light for over 20 years. The proposed development would contravene the fair and reasonable 'right to light' claim by residents resulting from the obscuration of a South-East solar trajectory.</p> <p>Negative alteration to the character and nature of Theale village</p> <p>The encroachment on green/brown spaces surrounding Theale and the increased development and traffic will erode the character and identity of Theale village.</p> <p>In summary any proposals to include RSA11 as a development location should be wholly refused as it stands in direct contradiction to myriad land/heritage conservation policies and would also be to the detriment of the quality, character, safety and amenity value of the area, as outlined in the points above.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Young, David
<p>Consultee Full Name</p>	David Young
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS149
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 11
<p>Chapter / Policy / Appendix Title</p>	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
<p>Order</p>	103
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	21/02/2023 12:00:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I have been alerted by my local Councillor (Alan Macro) regarding several proposals for building more new homes in Theale, to be included in the revised Local Plan.</p> <p>The proposals are as follows :-</p> <ul style="list-style-type: none"> • 40 houses built on Whitehart Meadow - the area of land between the Woodfield Way estate and the M4. • 60 houses built on the site of the former sewage works, off Blossom Lane <p>I have previously responded to object to both these proposals in recent years when they have been submitted as formal planning applications to West Berks Council.</p> <p>As a resident living close to both these sites in Theale, as previously I would also like to register my objection to these proposals being included in a revised Local Plan for Theale. Aside from the more detailed objections that were submitted previously, I would add that we have already had approval granted for many new homes to be built in the village and we should not have to suffer yet more house-building and loss of green space.</p> <p>I would be grateful if you could take the above into account when reviewing the Local Plan in the coming weeks.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Button, Andy
Consultee Full Name	Andy Button
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS109
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	20/02/2023 15:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing in response to the consultation on the Local Plan. I wish to object most strongly to the two proposed development sites in Theale.</p> <p>The site at Whitehart Meadow for 40 homes is totally unsuitable – many of the houses would be underneath the electricity pylons, they would be next to the M4, and building there would remove the green space between Theale and Reading. This would also increase the amount of traffic using the mini roundabout at the eastern end of the High Street, which is already a pinch point for vehicles.</p> <p>The site at the old sewage works for 60 homes is also totally unsuitable – it could only be accessed by vehicles using Crown Lane and Blossom Lane, both of which are narrow and already congested and have narrow or non-existent pavements.</p> <p>The addition of these potential 100 homes to the 429 already planned for the Lakeside site and the land between The Green and the A340 would represent an increase in Theale's population of over 40%, completely changing the nature of the village for the worse. The current infrastructure is barely coping with the current population as it is.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Spence, Diana
Consultee Full Name	Diana Spence
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS680
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I wish to strongly object to your proposals to build yet more houses in Theale, due to the following reasons:-</p> <p><u>The Old Sewage Works</u> – Proposal to build 40 houses</p> <p>Access to the houses would have to be investigated, the current access is definitely not suitable.</p> <p>More important objections:</p> <p>You have already given consent for a total of 440 houses to be built at the western side of Theale - No doubt the building company will submit requests to increase the quantity, as that appears to be the norm. Has this figure been included in your allocation for building in Theale? You mention "infrastructure".</p> <p>Does that mean you will build/extend Theale Medical Centre and arrange employment of more doctors and paramedics?</p> <p>The Medical Centre is struggling to cope with the sheer number, and every increasing number, of patients it already has, so this is an issue of great concern.</p> <p>The horrendous increase in traffic – also taking into account the houses to be built in Thatcham. The sheer volumes will surely increase congestion at the Theale roundabouts with traffic wishing to gain access to the M4.</p> <p>Lastly, Theale is a village. The residents wish it to remain a village. We do not wish to be joined up with Calcot or become a town. Theale has already taken a huge allocation of newbuild houses/flats and has, therefore, heavily committed to the need for more housing.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Turner, Steph
Consultee Full Name	Mrs Steph Turner
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS296
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 15:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I have received your recent 'intouch' leaflet where you claim to oppose inappropriate developments. Yet you are considering housing applications in several areas in Theale. Our village cannot sustain anymore housing developments.</p> <p>Roads are already congested, the doctors surgery is not big enough to take on more patients, it already takes weeks to have a face to face appointment. Theale has already been overdeveloped.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Dowdeswell, Barnaby

Consultee Full Name	Mr Barnaby Dowdeswell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS362
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 23:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Frankly it's ridiculous that this is even allowed to be considered - these areas of green space are known and evidenced habitats for local deer, rabbits, foxes and other other wildlife. We are meant to be protecting green space, not destroying it. This simply cannot be allowed to go ahead
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Batchelor, Deirdre & John
Consultee Full Name	Mr & Mrs Deirdre & John Batchelor
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS312
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 00:50:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>To who it may Concern</p> <p>We have lived in There for 22 years and you have been trying to build on Whitehart Meadow for all this time as well ass the Sewage Works nearby.</p> <p>Again we would stress that the infrastructure on the village - i.e. roads, services, doctors' surgery would be greatly affected. We always thought you could not build houses under pylons.</p> <p>We strongly object to all these houses going up which will affect our nice village.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS622
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>31. RSA11 P. 'Desk based' is not adequate and a survey should be carried out.</p> <p>32. RSA11. Access into Blossom Lane is not suitable. Crown Lane already has issues with traffic often single file as two vehicles cannot pass due to the narrow access. It will also not be safe for pedestrians due to the narrowness of the road.</p> <p>33. RSA11. The sewerage works were removed from the last Local Plan as they were rejected as a suitable site so this should be removed from the Plan, no changes to access the site have been made since the last plan.</p> <p>34. RSA11. The water main is not mentioned and needs to be.</p> <p>35. RSA11. Sulham Brook. This is a main river and a 10m buffer will not be sufficient. It should be a minimum of 30m. We object to this section as it is an increased flood risk.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1102
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	PS1102 Thames Water – Site Area Plans_RSA11.pdf PS1102 Thames Water - Biodiversity Net Gain_RSA11 Report.pdf PS1102 Thames Water - BNG calculator_RSA11.xlsm PS1102 Thames Water - Concept Plan_RSA11.pdf PS1102 Thames Water - Vision Doc_RSA11.pdf PS1102 Thames Water - 2 Nov 22 Letter_RSA11 PS1102 Thames Water_Illustrative Masterplan_RSA11.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>We fully support the allocation of the former Theale STW for residential development as per our previous representations.</p> <p>However, the site area has been reduced from the previous Dec 2020 draft allocation for Policy RSA 17 which included the open space to the east as per plans below:</p> <p><i>[See attachment PS1102 Thames Water – Site Area Plans_RSA11]</i></p> <p>It is understood that the current allocation is based on the developable area, which has been informed by the landscape sensitivity and capacity assessment the council had undertaken for the site. However, the landscape assessment does also highlight that the land beyond the pylons, within the ‘undevelopable areas’, could be used to design and create a positive buffer to the adjacent AONB, and retaining the open character. So, officers have agreed that open space/landscaping/BNG could go beyond the pylons, and can be shown on any future planning application. We consider that this should be made clear in the policy text.</p> <p>In November 2022 we submitted the following documents in support of the draft allocation (we have not resubmitted here but please let us know if this would be helpful):</p> <ul style="list-style-type: none"> • Former Theale Sewage Treatment Works Vision Document, November 2022, prepared by Carter Jonas <i>[see attachment PS1102 Thames Water - Vision_RSA11 Doc]</i>; • Former Theale Sewage Treatment Works Concept Plan, J0059808_002, prepared by Carter Jonas <i>[see attachment PS1102 Thames Water - Concept Plan_RSA11]</i>; • Former Theale Sewage Treatment Works Illustrative Masterplan, No. J0059808_V2_003, prepared by Carter Jonas <i>[see attachment PS1102 Thames Water - Illustrative Masterplan_RSA11]</i>; • Former Theale Sewage Treatment Works Biodiversity Net Gain Report <i>[see attachment PS1102 Thames Water - Biodiversity Net Gain Report_RSA11]</i> and Biodiversity Calculator, November 2022, prepared by ADAS <i>[see attachment PS1102 Thames Water - BNG Calculator_RSA11]</i>. <p><i>[A covering letter was also submitted and this is attached - see 'PS1102 Thames Water Letter 11 Nov 2022_RSA11']</i></p> <p>The Vision Document demonstrates the key considerations for a residential development at the site and includes the additional landscape buffers around the site edges resulting from the Council's commissioned Landscape Sensitivity and Capacity Assessment in September 2021.</p> <p>The Vision Document and the Illustrative Masterplan confirm that, having regard to the site considerations, the site can readily deliver 62 dwellings. This represents a relatively low density and appropriate character, having regard to the site's location and context. The development would provide a range of dwelling sizes and affordable housing in accordance with the Local Plan requirements.</p> <p>Further, a Biodiversity Net Gain (BNG) Report has been prepared which considers the potential for development at the site to deliver at least 10% BNG, as required by the emerging Local Plan Review. The strategy confirms that a BNG of at least 10% can be delivered on site, based on the illustrative scheme provided. The calculations confirm that the following is achievable:</p>

	<ul style="list-style-type: none"> • A 12.7% net gain for habitat units; • 5% net gain for hedgerow units; • A 58.1% net gain for river units.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Amend Policy RSA 11 b. as follows: i. Development will not extend beyond the north-east of the High Voltage Power Lines. The area beyond is not to be developed contrary to the Landscape and Sensitivity and Landscape Assessment' to be undeveloped, to retain the open character between Theale and Calcot, within the AONB. This area can be used to provide open space and biodiversity improvements required in association with the residential development.....
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To fully respond to any issues raised as landowner
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Aylett, Kevin
Consultee Full Name	Mr Kevin Aylett
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS968
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 00:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Proposed vehicular access to the site is not suitable: Observation clearly shows that local car ownership levels in Blossom Lane and Chestnut Close are at least two cars per household. An additional 60 homes will be another 120 cars. (Planning policy DN44 requires 2 or more parking spaces). Most of which will exit and enter each day, with couples both needing to work and young children taken to nursery/school, plus delivery vans. The proposed access is where 6 houses of Chestnut Close have cars parked in the road on one side and a narrow footpath the other. This stretch is currently heavily used by adults and children, walking and cycling to school from Woodfield way. Along with commuters to Ikea / Sainsburys, plus is a popular route for dog walkers. The road access into the continuation of Blossom lane has narrow/no pavement on one side and cars parked across the pavement on the other. To exit Theale these cars then need to negotiate the cars parked along one side of either Crown Lane or Blossom Avenue. Soil contamination: Thames Water / Kennet Properties have said in the past that the land is contaminated with heavy metals and underground gas chambers, from it's previous use, such that it is not fit for animal grazing, so cannot, be fit for human habitation. Wild life:

	<p>The site is currently home to wild deer, hedge hogs and other animals.</p> <p>Infrastructure: The current infrastructure of doctor's surgery is struggling to cope with the current population of Theale before the current sites in Theale with planning permission have even been built.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Sivyer, John
<p>Consultee Full Name</p>	Mr John Sivyer
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS293
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 11
<p>Chapter / Policy / Appendix Title</p>	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
<p>Order</p>	103
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	25/02/2023 14:52:00
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Good afternoon,</p> <p>These developments are of concern to me. The extra traffic to access these will be on unsuitable roads that are already congested with on road parking and the car repair business in Theale High Street.</p> <p>Furthermore school places and the doctor surgery are already over used and unable to cope with the existing residents needs.</p> <p>Currently the parking in the High Street serves the businesses and residents well, but extra traffic will cause issues with deliveries and bus services.</p> <p>Theale village is under threat from these developments and would just become another part of the Reading sprawl. The noise from the M4 traffic will make living in these new houses unpleasant and the air quality detrimental to the residents health.</p> <p>For these reasons I object to the proposed developments.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Cox, John
Consultee Full Name	John Cox
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS301
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	24/02/2023 16:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site of the old Theale sewage works off Blossom Lane is being proposed by West Berkshire Council as a site for 60 homes in its Local Plan review. They have labelled the site "RSA11". There are several reasons why this site is not suitable for housing:</p> <ol style="list-style-type: none"> 1. Flood risk 2. High voltage overhead power lines cross the site 3. The site has not been included in the Air Quality Assessment 4. Noise and pollution from the motorway 5. The site is contaminated from its past use a sewage works 6. The site has not been included in the Strategic Transport Model, meaning that the effect of traffic generated from the site has not been assessed. 7. Need to preserve the gap between Theale and Calcot/Tilehurst
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bush, Oliver
Consultee Full Name	Mr Oliver Bush
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS306
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 21:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Following the news that two housing sites have been proposed for unsuitable land in Theale, I would like to register my objection to such a plan. Ref: 40 houses on Whitehart Meadow 60 homes on the site of the old sewage works, off Blossom Lane The land is a greenspace, and a wet area for most of the year. There is not enough infrastructure to handle this plan alongside the housing plans at the end of Theale (Lakeside).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Scott-Picton, Virginia

Consultee Full Name	Virginia Scott-Picton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS465
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	I would like to express my concerns regarding the proposed development at Whitehart Meadow and Blossoms Lane. These green spaces provide habitat for wildlife as well as recreational areas for both children and adults to enjoy. I do understand that we do need houses built, and inevitably this will encroach on green spaces but I think that we do need to have green pockets for our children to learn in and play in, and wildlife corridors to balance the cost benefit with the nature around us that is vital for health and well-being, and the world that we need to preserve for the next generation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Powell, Claire
Consultee Full Name	Mrs Claire Powell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS893
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	01/02/2023 16:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I live in <address redacted>.</p> <p>I am writing with deep concerns about the proposed developments of 40 and 60 new homes near my house, in the scrub land next to the M4.</p> <p>The views from the back of my property over <road redacted> have already been changed from lovely greenery to houses which now look into my back windows. Now I am worried about the impact from these new developments.</p> <p>First, the mini roundabout at the junction of the High Street and Hoard Way will have significantly more traffic, and will contribute much more noise to me - and to the old people who are residents of Elizabeth Court <comment redacted>. We already have too much traffic using the High Street on their way to the M4 and elsewhere. To the detriment of my health and wellbeing, this will cause more exhaust fumes and noise.</p> <p>Secondly, Theale Medical Centre is already in a parlous state. I won't go there any more <comment redacted>. In part this is obviously because they are under such huge strain that they simply cannot cope. It shows already. There is not an infinite stretch to the the capacity of infrastructure in our village, and it seems irresponsible of Council and builders to think of new housing if there is not commensurate responsibility to all the other needs, such as the Medical Centre, roads and schools.</p> <p>I register these points with the utmost concern for my own wellbeing and that of the village.</p> <p>I must oppose these new developments under the current circumstances.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	I must oppose these new developments under the current circumstances.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ambrose, Rosemary
Consultee Full Name	Mrs Rosemary Ambrose
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS866
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I have been a resident of Theale for 16 enjoyable years and wish to oppose this plan. There is only one surgery in Theale, one primary school and one secondary school. Today, I have seen a noticeboard from Croudace Group announcing building on greenfield near the A4 roundabout. Planning permission is for approximately 230 homes on this site. Please stop. Theale does not need more homes! The additional cars in the village will be dangerous as the High Street is quite narrow and 'near misses' do occur.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please stop. Theale does not need more homes!</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Capewell, Adam
Consultee Full Name	Dr Adam Capewell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS974
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 10:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to voice my concerns over the Local Plan that appears to include up to 200 extra homes being built in Theale.</p> <p>According to the plan an extra 100 houses could be built to the West of the village (policy RSA 9) and a further 100 houses to the East (policies RSA10 and RSA 11).</p> <p>This would be a notable increase in the amount of housing in Theale, and my biggest concern is that these extra homes would put significant extra pressure on local facilities, and in particular the local schools.</p> <p>I have lived in Theale for about <redacted> months, and have a <redacted> year old son. We applied for him to attend Theale Primary School when we moved here. However, we are continually told that there is no space for him due to over subscription at the school. Instead, we have to drive 5 miles each way to his old school in Ford's Farm in Calcot, meaning we are driving about 100 miles a week to take him to school and pick him back up.</p> <p>I do not see how having a further 200 families in the village is tenable, considering the likely extra number of school places that this would require. As our experience shows, there are not enough school places for even one extra family, let alone 200. I seriously doubt that the capacity of the school could be increased enough to accomodate the likely extra number of children in the village.</p> <p>I further note that the High Street already suffers from bad traffic congestion (which we have no choice but to drive through to take our son to school each day), and the increased housing would only make this significantly worse.</p> <p>Whilst I understand the need for extra housing, I would say that Theale is not a suitable place for them.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Fletcher, Malcolm
Consultee Full Name	Mr & Mrs Malcolm Fletcher
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS971
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The Plan is unsound for the following reasons:</p> <p>RSA10 & RSA11</p> <ol style="list-style-type: none"> 1 Flood risk to the land. 2 High voltage overhead power lines across the site. 3 Noise and pollution from the motorway. 4 No air quality assessment 5 Theale would not cope with the increased traffic. 6 Land contamination – possible for both sites 7 RSA11 -access to the site is by a single track road. 8 Developments would no longer mean Theale would have a village feel. <p>Local medical and educational would not be able to meet the increased need</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Thames Water</p>
<p>Consultee Full Name</p>	<p>Thames Water</p>
<p>Consultee Organisation</p>	<p>Thames Water Utilities Ltd</p>
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS995
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	<p>No</p>

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Clarkson, Candy
Consultee Full Name	Candy Clarkson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS965
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 23:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Observation clearly shows that local car ownership levels in Blossom Lane and Chestnut Close are at least two cars per household. An additional 60 homes = a minimum 120 cars. Crown Lane and Blossom Lane are currently single file traffic, taking it in turn to give way to oncoming traffic. Any heavier usage would result in gridlock.</p> <p>Due to the lack of pavement in Crown Lane and Blossom Lane, wheelchair and disability scooter users, prams, pushchairs, children cycling to school, pedestrians and equestrians are all currently forced onto the road to compete with oncoming traffic. Heavier traffic would be even more hazardous to vulnerable road users than at present.</p> <p>Blossom Lane at the proposed access point to Whitehart Meadow is not wide enough to accommodate two lanes of traffic. Any traffic flow at this point would cut off egress and access to numbers 41, 43, 37 and 39 Blossom Lane. Utilities vehicles and the emergency services would be unable to attend when necessary.</p> <p>Thames Water and Kennet Properties confirm that the land is contaminated with heavy metals and underground gas chambers, such that it is not fit even for animal grazing. It cannot, therefore, be fit for human habitation.</p> <p>The current infrastructure will not support an increased population. e.g. the primary school is now full and it currently takes four weeks to get a telephone appointment at the doctor's surgery.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1440
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	PS1440 Cllr Alan Macro attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Section 4.35 of the Core Strategy contained the following statement: "The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". Housing construction on this development has not yet commenced, although Outline permission has been granted for up to 325 homes and Reserved Matters permission has been granted for part of the site.</p> <p>In addition, outline permission has been granted for 104 homes on the adjacent site between The Green and the A340 (LPR site RSA9). These two sites will increase the number of homes in Theale by almost 25% when built out.</p> <p>Therefore, that statement is still valid and no justification has been given for not carrying that section forward to the LPR. Theale still needs that "period of consolidation".</p> <p>The site is close to the M4 motorway and thus subject to noise and air pollution. The latter is exacerbated in the morning peak because the M4 eastbound frequently slows to a crawl or standstill past this site. This worsens air pollution because:</p> <ul style="list-style-type: none"> • The density of vehicles increases as they close up, producing more pollution in a given length of road • Vehicle engines produce more pollution when idling or running slowly • The pollution does not disperse so widely because it is not dispersed by moving traffic. <p>High voltage power lines run past the site. In addition to visual intrusion and danger of electrocution (e.g. from climbing ladders or scaffolding or from flying kites), scientific research shows that they generate ozone and nitrogen oxide air pollution (increased by 13% and 30% over normal levels according to paper "Emissions of pollutants and air quality in the area of influence of high voltage overhead electrical lines" by Cociorva Danut, Mihaela Andreea Mitu and Natalia Raischi: <hyperlink removed - see attachment> This would add to the pollution caused to the site's residents by traffic on the M4.</p> <p>The site is severely contaminated from its history as a sewage works (until the mid-1980s) and as a depot for the old Bradfield Rural District Council. It is also rumoured to have been used as a waste site by the RDC. The cost of de-contamination could make the provision of affordable housing on the site unviable, and perhaps make development of the site unviable.</p> <p>A large proportion of the site is in flood zone 2. The site also is at risk from surface water and groundwater flooding (please see relevant section in the HELAA). This significantly reduces the extent of deliverable land and the latter makes SUDS problematic.</p> <p>The access to the site would be from the single-track end of Blossom Lane. Blossom Lane is very narrow in places and also has narrow footways. The footway on its southern side (that most likely to be used by pedestrians from the site) is not continuous, meaning that pedestrians would either have to walk in the road or cross it twice giving road safety concerns.</p> <p>The majority of pedestrians walking to the western end of Theale High would walk along Blossom Lane and Crown Lane. Crown Lane's footways are extremely narrow, only 60cm in places, meaning that pedestrians would have to step off footways to pass each other. There is no footway at all on the west side of Crown Lane at its southern end.</p> <p>The combination of increased pedestrian traffic and narrow and missing footways means increased numbers of pedestrians walking in, and crossing, the road. This, in combination with increased vehicle movements caused by the development would pose serious road safety dangers.</p> <p>The majority of traffic accessing the site would use Crown Lane*. It would impose another 41 to 44 movements in the am peak and 34 to 41 in the pm peak on this road**. This would cause the following problems:</p> <ul style="list-style-type: none"> • The lane is effectively single-track because its eastern side is a parking bay reserved for residents. • Opposing vehicles could cause gridlock. • Contention with traffic on the convoluted junction with the High Street would increase tailbacks on Crown Lane. • It would add to congestion on the High Street and at the Station Road mini roundabout. <p>10 to 14 vehicles accessing the site would use the Play Platt/Englefield Road junction in both peaks*.</p>

	<p>This would exacerbate the existing delays of 40 seconds in the am peak at this junction. It would also exacerbate traffic problems elsewhere in the highway network in Theale as described in the comments on Policy SP14</p> <p>* Traffic movement information from the traffic assessment in the planning statement for planning application 16/02850/OUTMAJ, 88 homes at Former Sewage Treatment Works Theale, adjusted for 60 homes</p> <p>The reasons that the site was not allocated in the Housing Site Allocations DPD are still valid:</p> <p>“When the preferred options version of the Housing Site Allocations Development Plan Document was consulted upon, significant concern was raised regarding access to the site, with limited scope for improvements to be made without acquiring third party land. Further technical work was carried out following preferred options, in particular landscape assessment work indicated that the site would be suitable for development subject to various mitigation measures, including a buffer to separate the site from the existing village. As a result, the site was not considered to be well related to the existing settlement and could result in a negative impact in terms of impact on the character of the built environment.</p> <p>At the submission stage, the site was not recommended for allocation.”</p> <p>The site is not included in the West Berkshire Strategic Traffic Model, meaning that the model is not accurate and that the effect of traffic generated from this site has not been assessed.</p> <p>The site is not included in the Air Quality Assessment, meaning that the Assessment is not accurate Site is missing from the table [Air Quality report table 8 - 13]</p> <p>The subsoil on the site is made up of peat (when the adjacent part of the Woodfield Way estate was built, peat to a depth of approximately two metres was excavated).</p> <p>Peat is a very good store of carbon. This carbon would be released as CO2</p> <p>This site is close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which is unsustainable</p> <p><u>SA/SEA App 7 9b</u></p> <p><i>9 (a) The policy would NOT reduce West Berkshire’s contribution to greenhouse gas emissions as excavation of the deep peat subsoil would release carbon dioxide into the atmosphere</i></p> <p><i>9 (c) The policy would NOT reduce flood risk as removal of peat subsoil during construction will reduce attenuation of surface water entering the Sulham Broo, increasing flood risk to properties downstream</i></p> <p><i>3(a) The policy would NOT improve access to education, health and otherservices as health and primary education services in Theale are already over-subscribed</i></p> <p><i>5(b) The policy would NOT conserve and enhance the character of the landscape because it will replace a green area with a housing estate and negatively affect the setting of Theale as viewed from the M4</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The site should be removed from the LPR</p> <p>The site should be included in the Transport model and any necessary mitigations carried out</p> <p>The site should be included in the Air Quality Assessment and the table [8-13]</p> <p>The effect of the policy on these sustainability objectives should be changed from positive. The cumulative impact of the policy should be changed to negative.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain why this section of the core strategy is still valid</p> <p>To explain the problems caused by high voltage power lines close to homes</p> <p>To explain the effect on pedestrians in Theale</p> <p>To describe how the local subsoil is made up of a peat to a deep level</p> <p>To explain why the policy is not sustainable</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	<p>Yes</p>

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Townsend, James
Consultee Full Name	James Townsend
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1023
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:37:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>I wish to raise issues regarding the proposal by West Berkshire Council to allocate Old Sewage Works (off Blossom Lane) in its Local Plan review.</p> <p>A) Specific to Old Sewage Works site (RSA11)</p> <ol style="list-style-type: none"> 1 There is flood risk to this site and high voltage overhead power lines cross the site. 2 It's close proximity means that, in addition to noise, pollution from the motorway needs to be investigated and the site has not been included in the Air Quality Assessment. 3 The site is contaminated from its previous use as a sewage works. 4 The site has not been included in the Strategic Transport Model, meaning that the effect of traffic generated from the site has not been assessed. Blossom Lane is currently one lane road to two houses at its northernmost point. Blossom Lane links to Crown Lane (congested with parking bays on one side meaning that is a single lane road for most of its length) and then to the mini-roundabout on the West side of Theale High Street. The effect of 40 houses built on Old Sewage Works needs to be carefully assessed before any consideration as to the suitability of this site. <p>B) In combination with Whitehart Meadow site (RSA10)</p> <ol style="list-style-type: none"> 1 A combined total of 100 homes is proposed for Theale <i>which is in addition to</i> the over 440 homes on the western side of Theale that are yet to be built but have been granted planning permission. 2 There are artificial deadlines which we know is why this plan is being rushed through. Yet the Local Plan Core Strategy says that "If this development [350 homes at Lakeside site] goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". No justification has been given as to why this requirement, still much needed, has not been carried forward into the Local Plan Review. 3 <i>Neither</i> site has been included in either the Strategic Transport Model or the Air Quality Assessment. 4 The proposed extra homes will put extra pressure on local health services that are already stretched to the limit. 5 Traffic from these two proposed sites puts huge pressure on the two mini-roundabouts at either end of Theale High Street making local road congestion even worse. <p>Thanks in advance for your consideration.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Church, Joanna
Consultee Full Name	Joanna Church
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1100
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/01/2023 13:01:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I would like to object to planning on whitehart meadow and theale sewage works for the following reasons:</p> <p>Sewage works:</p> <p>Unsuitable access it's way to narrow and would be made more dangerous for chilling already using this area to walk to school. Again wildlife and countryside. The land is also flood area and contaminated.</p> <p>Over all there is already planning given to 400 odd houses in theale and on top of that windfall sites . This village is struggling to cope as it is and to add anymore would cripple it. I have not seen any plans to make the surgery bigger for the planning already permitted. This village will be ruined and no one will want to live here if its expanded from a lovely village to an ugly town that cannot cope.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Watson, Ken
Consultee Full Name	Dr and Mrs Ken & Rebecca Watson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1243
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We are writing to you regarding the proposed plan to build 60 homes on the Old Sewage works in Theale - RSA11 and to build 40 homes on Whitehart Meadow - immediately next to the Old Sewage Works.</p> <p>We live on <redacted> and are very concerned regarding access to this number of properties via this road. The road already struggles with the number of vehicles using it, given it is essential a single carriageway due to the parking. Similarly the pathways are thin and sometimes disappear entirely, making it unsuitable for greater numbers of people to try and walk down. Access to the centre of the village from Blossom Lane involves a complex junction with a mini-roundabout which is often used incorrectly, and the road surface through the high street, and the far end of Blossom Lane leading to Englefield Road both suffer from road damage, leading to dangerous pot holes. If these roads were to be used increasingly we'd need to see a better level of upkeep and substantial changes to the roads i.e. making them wider, which isn't possible given the need for parking.</p> <p>The actual site proposed seems highly unsuitable for major development given the proximity to the M4, which cause issues of air and noise pollution. Plus there is the presence of multiple pylons, which seems highly unsafe - how would the presence of these be mitigated for people's safety, particularly children? The area is also currently an undeveloped site. It's full of wildlife, and we can't understand how it would be deemed ok to destroy this. We recently also learned the area is potentially contaminated due to the previous use of the site for sewage works. Again, this seems unsafe and that it would require undue workarounds to make sure foundations could be built. Finally, the area proposed is known as a high risk area for flooding. Given the increased likelihood of flooding when you take away trees and add in tarmac and other non-soluble surfaces, the likelihood of flooding is only going to get worse. Last year we experienced intense rainfall which caused areas of Blossom Lane to flood.</p> <p>Crucially there doesn't seem to be any plan for how Theale will be able to serve this level of new people. The medical centre has struggled over the winter and the pharmacy often has long queues. Similarly, has the influx of people been considered for the local schools and other services. At the moment there would be no access for buses to serve the new development, making it a lengthy walk for anyone wanting to use it. Given the issues regarding the pavements this would be totally unsuitable, particularly for people with additional needs such as wheelchair users and people with prams/pushchairs.</p> <p>Lastly, it's important to remember that Theale is a village, which is currently managing to retain a village community and spirit. To build 100 new homes on these sites would bring such a high number of people all at once, it seems a major threat. Making Theale just another suburb of Reading rather than the village all of the current residents enjoy and love.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1838
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is Partly Flood Zone 2 and is approx. 20m from main river. The site is on secondary A superficial and principal bedrock aquifer</p> <p>The Sulham brook which is located some distance from the site is a main river and a headwater and is home to Brown Trout and Bullhead that makes it more ecologically important, therefore apart from the provision of a 10m buffer, an ecological assessment should be provided and approved before planning permission is granted. This should be included in the policy.</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1790
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 11

Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes

Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Josey, Naomi
Consultee Full Name	Naomi Josey
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1576
Chapter / Policy / Appendix Number	Policy RSA 11
Chapter / Policy / Appendix Title	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
Order	103
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:07:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am in objection to the proposed sites in Theale in the West Berkshire Local Plan Review, this being the 40 homes on Whitehart Meadow and 60 homes on the old Theale Sewage Works for the following reasons:</p> <p>The impact of additional traffic on the village. The proposed access route is a major route used by pedestrians to access the footbridge over the motorway. Additional traffic will raise risks to pedestrians, particularly school children. The high street is narrow and already ill-equipped to deal traffic. The junction is already busy due to its proximity to the motorway, business parks and the A4.</p> <p>The impact on the estates that will be adjacent to the developments – Woodfield Way, Rotherfield Close, Alderfield Close, Blossom Avenue, Blossom Lane etc, resulting in an impact on view, traffic through the local area. This is currently predominately a residential area and this development will impact on the living standards of existing residents. Blossom Lane is a narrow and very quiet road, construction traffic and eventual residents cars would cause risks to pedestrians and inconvenience to all.</p> <p>The development will reduce the protective barrier between their homes and the motorway.</p> <p>The negative impact on working standards in regard to the new development being in extremely close proximity to the overhead power lines and the motorway, leading to poor air quality, noise pollution and poor working environments.</p> <p>The environmental impact on the wildlife that currently lives in the area including deer.</p> <p>The visual impact of the structure will affect the outlook of the village on approach.</p> <p>There are already two approved areas of development in Theale (The Green and The Lakeside site) resulting in the potential building of 400+ homes. The facilities in Theale including the Medical Centre and the School are already under strain. Currently there are wait times of up to 3 weeks for a GP</p>

	<p>appointment and 45 minutes plus on the phone to try and get a duty appointment. It needs to be considered that this is before the building of the proposed 400+ homes, adding another 100 homes, plus a proposed large site of 1500 between Theale and Thatcham will add huge stress to these services and traffic to the area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1213
Chapter / Policy / Appendix Number	Policy RSA 12
Chapter / Policy / Appendix Title	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)
Order	105
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Our client has an agreement with the landowners of the site, known as 'Land to the rear of The Hollies' in the District, which currently forms part of an allocated site for approximately 60 dwellings under Policy HSA16 in the adopted Housing Site Allocations Development Plan Document (HSADPD) (May 2017).</p> <p>It is understood the 'emerging draft' Local Plan Review (LPR) no longer seeks to carry this allocation forward. This is despite part of the allocated site having already been built out and now occupied by residents. The Council say this is because the site now falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield. The DEPZ was extended as a result of the updated Radiation (Emergency Preparedness and Public Information) Regulations (REPPPIR) 2019.</p> <p>Our client does not support the removal of this allocated site from the Development Plan. Our client is keen to work collaboratively with the Council to secure the development of the remaining part of this currently allocated site. These representations therefore focus on responding to the removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield.</p> <p>These representations also seek to respond to the Council's development strategy (including Policies SP1 and SP3, SP12 and SP14) and decision-making in relation to an effective 'moratorium' on new development within Burghfield Common, despite the village remaining as a 'Rural Service Settlement', which offers 'development potential appropriate to the character and function of the settlement', according to the proposed Spatial Strategy.</p> <p>These representations also discuss Policy RSA12, which seeks the provision of approximately 100 dwellings within Burghfield Common1, within the extended DEPZ.</p> <p>In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework (NPPF) (July 2021) paragraph 35. This identifies that a sound Plan is:</p> <ol style="list-style-type: none"> 1 a) Positively Prepared– 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development'; b) Justified– 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence'; c) Effective – 'deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground'; and d) Consistent with National Policy – 'enabling the delivery of sustainable development in accordance with the policies in this Framework'. <p>It is in light of these criteria that the LPR (Regulation 19) version has been considered. We find the de-allocation of site HSA16 is not consistent with the Council's approach to its development strategy and the settlement hierarchy. In addition, its approach towards a 'moratorium' on further development within the parish of Burghfield Common is flawed.</p> <p>Notwithstanding the very clear and unreasonable inconsistency in the Council's decision making between HSA15 and HSA16, Policy RSA12 is to be carried forward as an allocated site within the LPR despite Burghfield Common now being within the extended DEPZ. That site has apparently been accommodated as part of the Emergency Plan. This does clearly demonstrate that the Emergency Plan can be made to be adaptable should the Council wish to make it in order to accommodate additional development. The Emergency Plan even states at paragraph 1.6 that "<i>West Berkshire District Council will ensure the plan is updated in accordance with:</i></p> <ol style="list-style-type: none"> 1 c) <i>following any organisational or progress changes</i> 2 d) <i>on at least a 3 yearly basis a full formal review will be undertaken</i>". <p>Given the most recent Emergency Plan was in place from June 2022, Reserved Matters at the Pondhouse Farm site were granted in July 2022 and that the formal review date of the Emergency Plan is scheduled for 2022/2023, it is entirely feasible that our client's site allocation for the remaining 32 dwellings can be accommodated within an updated version of the Emergency Plan.</p> <p>As previously discussed, the Council have failed to provide clear justification over why having outline planning permission on an allocated site in the HSADPD 2017 (Policy HSA14) can be accommodated within an Emergency Plan, where the DEPZ was only extended post-2019 and reserved matters for that site was not then approved until July 2022, whilst provisions in the Emergency Plan for an adjacent allocated site, which had only been partially approved at the time the DEPZ was extended, cannot be made. This appears illogical and subject to personal views influencing proceedings rather than due process, and in terms of plan making is clearly unsound.</p> <p>Our client's site has since been removed from Policy SP14, despite being included in the Regulation 18 version of the draft Plan. Policy RSA16 has also been removed from the draft Plan. This results in the plan failing to be justified given the lack of any evidence provided to support the removal of the site.</p> <p>Paragraph 6.33 identifies that "<i>if in the future the DEPZ is reviewed and the emergency planning arrangements are amended, then future reviews of the Local Plan will consider whether strategic allocations in this area would be suitable</i>", suggesting that contrary to the Pre-application Advice received,</p>

	<p>there is no 'moratorium' on development, particularly as Policy SP3 still seeks to promote housing and economic development within Burghfield Common.</p> <p>Referring back to the REPP19 Regulations, these clearly expect there to be changes over the life of an Emergency Plan, such that the Plan will need to be updated at least every three years. There is therefore no sound reason why the Council's Emergency Plan cannot be updated to accommodate the remaining 32 dwellings on the allocated site, or that an arbitrary 'line', based on personal judgement alone, needed to be drawn to exclude half of an allocated site in an adopted Development Plan. That personal decision should not support the removal of this site from the LPR.</p> <p>We therefore consider the Council has not properly reviewed or justified its approach towards development within the DEPZ of the AWE sites, particularly in relation to the provision of housing around AWE Burghfield and that there is confusion over the spatial strategy in relation to development within Burghfield Common.</p> <p>We consider there are fundamental inconsistencies in the way in which other applications for development have been determined in the area, as an allocated site should hold the same weight as a site with planning permission having regard to the definition of deliverable in the Framework. In order to overcome our objections to this regulation 19 LPR, the Council should reinstate the allocation of the site in the Local Plan and update the Emergency Plan to accommodate it.</p> <p>Conclusion</p> <p>These representations have been prepared by Pro Vision on behalf of our client, T A Fisher & Sons, in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039 (Regulation 19) (January 2023).</p> <p>Our client has an agreement with the landowners of the site known as 'Land to the rear of The Hollies' in the District, which currently forms part of allocated site 'HSA16', in the adopted HSADPD (May 2017).</p> <p>We note the allocation for the site is no longer included within the 'emerging draft' LPR, as the site falls within the extended Detailed Emergency Planning Zone (DEPZ) of AWE Burghfield, despite there being a remainder of 32 units still to be delivered.</p> <p>Our client does not support the removal of this allocated site from the LPR.</p> <p>These representations have therefore focused on responding to the unjustified removal of the allocated site from the LPR and the changes proposed to Policy SP4 in relation to AWE Aldermaston and AWE Burghfield as well as the development strategy and spatial hierarchy proposed by the LPR.</p> <p>In particular, we consider the remaining number of dwellings should be carried forwards in the LPR as the development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To ensure that the views of our client in respect of the removal of the allocated site known as 'Land to the rear of The Hollies, Burghfield Common' and the inconsistencies in the spatial strategy, particularly towards development within the DEPZ, are heard</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS996
Chapter / Policy / Appendix Number	Policy RSA 12
Chapter / Policy / Appendix Title	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)
Order	105
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Woodland Trust
Consultee Full Name	Ms Bridget Fox
Consultee Organisation	The Woodland Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS857
Chapter / Policy / Appendix Number	Policy RSA 12
Chapter / Policy / Appendix Title	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)
Order	105
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 00:23:00
Attached Files	PS857 Woodland Trust - Ancient Woodland.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	The policy provides protection for ancient woodland in line with the NPPF.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	The NPPF requires protection for ancient woodland. We support the policy wording <i>k. Retain existing woodland on the site and provide an appropriate buffer of at least 15 metres between the development and the areas of ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development;</i> However, we note that the map on p110 suggests that the ancient woodland is further from the red line site boundary than is recorded on the Ancient Woodland Inventory (Defra Magic Maps) where the ancient woodland is directly adjacent. This should be corrected in the final version of the Local Plan.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	n/a
4. Proposed Changes	<i>[See attached Woodland Trust Map]</i> We request that an accurate map of the adjacent ancient woodland be provided to accompany the policy. A screenshot of the relevant layer of Defra Magic Maps is given below.
5. Independent Examination - If your representation is seeking a change, do you consider it	No

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	n/a
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1205
Chapter / Policy / Appendix Number	Policy RSA 12
Chapter / Policy / Appendix Title	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)
Order	105
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	As per comments made in relation to SP14, AWE object to the re-allocation of land adjoining Pondhouse Farm, Clayhill Road. Despite this allocation being within the current local plan, due to the redefining of the DEPZ during the plan period, this allocation for 100 residential units would now be in direct contravention of SP4 as the site is located within the Burghfield DEPZ; in applying policy SP4 the allocation is "likely to be refused planning permission..... especially when the ONR and/or MOD have advised against the development and/or object".
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1791
Chapter / Policy / Appendix Number	Policy RSA 12
Chapter / Policy / Appendix Title	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)
Order	105
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1839
Chapter / Policy / Appendix Number	Policy RSA 12
Chapter / Policy / Appendix Title	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)
Order	105
Submission Type * E-Mail	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A superficial and bedrock aquifer</p> <p>The policy requires an ecological impact assessment and the avoidance of the adverse impacts on protected habitats/species. It will be useful to require a protected species survey as well.</p> <p>This is a large development compared to the size of the receiving Burghfield STW. Burghfield is a high spiller, mostly due to Ground Water infiltration. We would not support a large development within this catchment as it will lead to higher frequency of spills. Burghfield STW does not have a permitted phosphorus discharge value now.</p>

	There are options to tighten permit limits at Burghfield to mitigate the impact of the development. We are happy to discuss these options with West Berkshire Council.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy RSA 13 Land north of A4 Bath Road, Woolhampton (Site Ref MID4)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Molloy, Stephanie
Consultee Full Name	Stephanie Molloy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS450
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I object to the West Berkshire Local Plan Review 2022-2039 proposed submission as it is unsound, due to the following reasons:</p> <p>West Berkshire Council needs to understand that this is a rural county, not a built up conurbation. This is how the A4 will end up if Policy RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4); Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation and Policy RSA9 Land between A340 and The Green, Theale (Site Ref: HSA 14) are allowed to go ahead. Being a rural council, and due to the landscape, West Berkshire is never going to be a rich council due to the number of inhabitants. But it must remember that each and every one of its inhabitants is entitled to a decent quality of life, easy and acceptable access to work; home; food provision; activities in the open air; decent healthcare provision for both health and dentistry; and schooling for all ages, and in my view this plan does not support that.</p> <p>Why is West Berkshire Council not insisting on all the new properties being built with solar and wind power as from now, as well as any other long term eco building practices. You do not need to wait for the Government's target date before taking action. Brownfield sites should be used first and not just built to make up government target numbers. Woolhampton is a rural village and not part of a town, and should never be part of any aim to build along the A4 from Bristol to London, so there are no green fields visible.</p> <p><u>Policy RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</u> The plan for these 16 houses has been rejected already and has been refused on appeal. This should be dropped from the plan.</p> <p>Transport:</p> <p>The current roads in West Berkshire are no longer fit for current capacity and purpose. Adding all these homes in both Policy RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4) and Policy SP17 HSA17 RSA13 North East Thatcham Strategic Site Allocation, would have a catastrophic and detrimental impact to Woolhampton and other villages along the A4. As it is, it takes long enough to get onto the A4 from Woolhampton Hill when the traffic is clear (taken over 20 minutes before), and not just at peak times, when you can wait much longer.</p> <p>We all know the car is and will remain king as this is a rural place and all transport options are not going to be available. Safety is a priority, and I do not think this has been achieved in this plan. I believe that any traffic trip rates used by West Berkshire Council are unreliable - who takes traffic readings at 09.30 on a school day and calls it peak time? What proper assessments have been made of the routes that are most likely to be affected by the increase in traffic?</p> <p><u>Policy RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</u> looks like it will go straight onto the A4 - this will add another junction within a few feet of New Road Hill and the entrance to the</p>

	<p>Village Hall and the houses there. So far there does not seem to be a proper solution to enable traffic to access these properties and then how they move properly through the village.</p> <p>Water, Waste Water and Sewage:</p> <p><u>Policy RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</u>, 16 houses to add to the already overburdened Waste Water Treatment Works in Woolhampton. Site Ref MID4 is located in the Parish of Midgham, the sewage and water come from the Parish of Woolhampton, there is no impact on the Parish of Midgham of these buildings. So far there seems to be no solution to this issue.</p> <p>Environmental Impacts:</p> <p><u>Policy RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</u> has an ancient woodland next to it. The Planning document says there will be a buffer of at least 15 metres between this and the development. How is this implemented? And will the same buffer be applied between Mariners Lodge and the development, to allow access for wildlife to New Road Hill?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chatten, Robert
Consultee Full Name	Robert Chatten
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS449
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p>	Web

* Web * Unknown	
Response Date	02/03/2023 10:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	I would be surprised if this was illegal. But I do not dare navigate to the guidance note, because getting to this page was too difficult to navigate away from
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	RSA 13 Has been, at least, once, to my knowledge refused. Access: It's a dangerous location-a bad accident has only recently happened where they are proposing to junction the A4. Drainage: I understand it is questionable. We have had bad floods in the village caused by water cascading down the hill. Untouched countryside: Is this genuinely the right place? Have genuine attempts been made to find more appropriate locations? Capacity: the village's infrastructure is too small to accommodate yet more housing. Pollution and visual intrusion: a virgin field becomes a place of urbanisation. It's going to be an eyesore for me, living opposite.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	Yes

* No	
Please give reasons for your answer	Again I'm not leaving this page, but I would hope and expect and hope the local authority is following correct procedure
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	I know I'm not the only one objecting to this, and more eloquent people can speak for me
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jordan, Daryl
Consultee Full Name	Daryl Jordan
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS252
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	25/02/2023 12:29:00
Attached Files	PS252 Daryl Jordon redacted.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	No guidance is provided in the document.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	No

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Consideration has not been given to previous objections and been included regardless.</p> <p>I wish to strongly object to the inclusion of the development of 16 dwellings on land at the junction between Bath Road and New Road Hill, Midgham, Berkshire in the West Berkshire Local Plan Review 2022-2039</p> <p>I am staggered that once again I am writing to object to this application for development, having been rejected in May 2022 after a thorough discussion within the planning council. Having read the design statement, it is clear that nothing has changed and so therefore why is it even being attempted for another application within the local plan? I assume the council who rejected it and those members of the public who objected to the development last time would eventually give up. Well this is absolutely not the case and the reasons for rejection last time are just as relevant this time around as well as three additional points namely a serious road traffic accident at the proposed entrance in December 2022, significant ice across the road on the hill running alongside the development site in recent cold weather and the significantly sized development (1500 plus) along the A4 on the edge of Thatcham. This also doesn't reflect the biodiversity loss on the site...</p> <p>The appeal document (statement of case), describes the proposed site as having a low probability of flooding. This may be so, but I do not believe consideration has been taken into how this development would affect the likelihood of flooding on other residents of the village. Currently, following a downpour, rain water runs down New Road Hill and across the A4 into already filled drains. This in turn causes flooding around the hall/children's park area to the south of the proposed development. During the past 12 months, the volume of water caused significant flooding as seen in the photos I have attached. <i>[document attached]</i> This is an annual occurrence. As I live <i>[personal information removed]</i> just north of the village hall, the thought of a large development and the subsequent increase of water that will inevitably run off to the existing properties is of great concern. I have included photographs to emphasise this concern.</p> <p>One of the other points that appears not to have been given enough thought is the issue of increased traffic. The appeal document states the new development would help reduce vehicle speeds into the village; there is no evidence to suggest this would happen. However, there would certainly be an increase in the number of cars using the A4 in an already busy stretch of the road; a busy stretch that would have to cope with an increase of traffic having to access the development via the only entrance to it, on the A4. <i>[personal information removed]</i>, I see on a daily basis the volume of traffic and can foresee the dangers involved in adding the complication of an access point, with cars waiting to turn right and causing a build up of traffic turning left into the development. This is made all the more difficult with the entrance to the village hall opposite the junction. Currently, at peak times, it can take a wait of up to five minutes to turn right from the village hall, which will only be made more treacherous with an increase in vehicles using the junction. At the end of the design statement, the first reason given for choosing the location/site</p>

	<p>was that it provided the safest single point of access. This is simply ludicrous. Anyone who lives along this stretch of the A4 are well aware of how busy the road has become and to increase the number of cars entering and exiting this access point will only add to the perils of this stretch of road.</p> <p>The appeal document lists the current infrastructure in the village of Woolhampton as satisfactory for the development of 16 new dwellings. I would strongly disagree. The infrastructure might be acceptable for the village as it is currently, but considering there are many new dwellings built at the east end of the village, the facilities simply cannot support further development on top of that which is already taking place. For example, the primary school is at maximum capacity and would need significant investment and new buildings in order to offer places to a greater number of children. I wonder if West Berks council have considered an expensive extension to the local primary school into their decision on this application? With the inevitable extra children the development at the east end of the village will create, there simply are not the places locally for primary aged children. Also access to the primary school is an issue. The design statement states that the school is within walking distance; unfortunately, villagers cannot walk to the school because of the lack of a footpath up the hill. The appeal document continually states inaccuracies such as this one, which casts doubts on the credibility of the statement of case.</p> <p>One of the key reasons why I object to this development is the inevitable change that it will make on the landscape character of the village, especially considering the substantial new development currently taking place at the east end of the village. The appeal document says that West Berkshire Council overstated this argument when refusing the original planning application. In my opinion, the landscape character of a village is at its very heart and essential to preserve the rural nature of Woolhampton for all the residents. In my view, little regard has been taken into considering conservation issues, including protected species, and in reading the statement of case it appears the appellant/developers have completed very little since the original application to address this fundamental issue. If planning was refused first time round due to, amongst other reasons, landscape character and conservation issues, if the points have not been addressed or anything changed, then surely the original decision must stand. The transition between countryside and built-up area has not been successfully secured and I believe the proposed dwellings will significantly alter the setting of Woolhampton in a negative way. Has the appeal document provided evidence that the development won't have a detrimental effect on wildlife? Have surveys for bats and dormice been completed? I see an application that has very little regard for any of these things that local villagers feel strongly about.</p> <p>In conclusion, West Berkshire Council viewed that the proposed development is not on land identified as suitable for new residential development and the reasons above are just a few of the issues which mean that in my opinion, they were correct in their decision to originally refuse this planning application. I hope they stay strong and resolute when dealing with this unwanted application with the West Berkshire Local Plan 2022-2039.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	No guidance provided.
<p>4. Proposed Changes</p>	An accurate guidance document being provided with clear explanations would help considerably.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gauci, Patricia
Consultee Full Name	Patricia Gauci
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS698
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 13:41:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Whilst legally the review may have ticked the required legal boxes, as a resident it has not only been hard to access this representation form, the fact that this local plan review is taking place has not been advertised widely. The consultation process has been poor and this could have easily been missed, and indeed I am sure it has been missed by many residents who will be affected by housing development in their area. With regards to RSA13, this is a repeated pattern of poor consultation of residents. In addition the house allocation information was published after the plan which is the wrong way round.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	1. It has not been positively prepared as the consultation has been poor (again). 2. I don't believe it has been justified as with regards to RSA 13, it does not seem to have taken into account other significant development in the village where a large number of houses have been recently built having a massive impact on the local infrastructures - this is not sustainable way forward. 3. There is no evidence that there has been a cross boundary approach: RSA13 is in the parish of Midgham (literally on the boundary with Woolhampton); the recent large development is in Woolhampton only 3-400 metres further down the road so development impacting an area is not be considered holistically. 4. For the above reason I don't believe his is consistent with national policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	I do not see how it can be cooperative because as residents, the information on this review has not been forthcoming. The consultation process was poorly advertised, and as this is not the first time this has happened, it seems that this is a deliberate policy. In addition, this process of representation is not straightforward to complete and take part in - again, not being inclusive and trying to work with the communities affected. There needs to be thorough consultation with the local communities and not just a box ticking approach to get things pushed through as quickly as possible; due process also has to be completed which I don't believe is the case because the plan should have been created following the house allocation.
4. Proposed Changes	There needs to be thorough consultation with the local communities and not just a box ticking approach to get things pushed through as quickly as possible; due process also has to be completed which I don't believe is the case because the plan should have been created following the house allocation.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	

Comment ID	PS997
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Waste Response

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Woodland Trust
Consultee Full Name	Ms Bridget Fox
Consultee Organisation	The Woodland Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS859
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 00:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	The policy provides protection for ancient woodland in line with the NPPF.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	Yes

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The NPPF requires protection for ancient woodland.</p> <p>This site is adjacent to ancient woodland Great Mounts Copse (SU57016687) PAWS 0.31 Ha, which in turn is adjacent to a larger area of Ancient Semi-Natural Woodland.</p> <p>We support the policy wording</p> <p><i>h. Provide an appropriate buffer of at least 15 metres between the development and ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development;</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	n/a
<p>4. Proposed Changes</p>	n/a
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	n/a
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stace, Roger
Consultee Full Name	Roger Stace
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS916
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:05:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The consultation was poorly advertised and almost prohibitively difficult to engage with. The housing allocation information was published after the plan which is the wrong order
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As a resident of Rowlands Copse on New Road Hill I strongly object to the inclusion of RSA 13 in the local plan. Planning applications for this site have already been rejected twice. To put it in the Local Plan so it can get through the back door is not acceptable. It will put additional pressure on the amenities of the village and cause damage to wildlife, their habitats and the local, rural character of the village.</p> <p>Wildlife and rural character of the village:</p> <p>The village lies just to the south of the North Wessex Downs AONB, as such the natural and rural character of the landscape is an important feature. The urban creep locally is already very evident with Reed Gardens to the east of the village adding over 30 properties. To the west in Thatcham, multiple developments are underway or proposed, blurring and diminishing the important green spaces between our villages and towns.</p> <p>This proposed development is immediately adjacent to Great Mounts Copse, an ancient woodland and priority habitat. The grassland and hedges of the development site are important habitats in their own right and a vital buffer to the woodland and providing connectivity for wildlife to move across the landscape. The hedges may well be retained and the woodland buffered in the new development but the disturbance, initially from construction and then in perpetuity from light, noise, pets and people living their lives in the new development cannot be ignored. The area will inevitably become poorer for wildlife.</p> <p>New Road Hill does not have street lighting and beautiful views of the night sky can be enjoyed. The additional lighting of 16 new properties packed into the plot of land will cause additional light pollution. Additional lighting, however sensitive, will impact on invertebrates such as moths and other night-flying insects as well as foraging bats and owls.</p> <p>The field as it currently is, also retains rain water and reduces the speed of run off from the hills to the north, into the River Kennet, a Site of Special Scientific Interest. Natural retention and slowing of water is the best way to prevent flooding of property lower in the valley. The additional drainage and waste from the development will increase pressure on the sewerage network and the works on Station Road. Again additional weather risk to the River Kennet SSSI. During recent cold weather the run-off from existing roads onto the A4 already caused dangerous icy patches. More hard standing from this development will further exacerbate this.</p> <p>Road Junction and Parking:</p> <p>The proposal to have another road junction onto the A4 a mere 50m west of the New Road Hill junction is adding complexity and risk to an already difficult road junction. As someone who regularly turns right out of New Road Hill I know how difficult this can be at rush hour. The speed limit change means judging pulling out onto the A4 is difficult. This will be even harder for cars turning out of a new junction further west. The addition of more cars turning out of a new junction to the west combined with those vehicles already joining the A4 from both New Road Hill and Woolhampton Hill will make accidents that much more likely. This was exemplified by a recent accident with a vehicle joining the A4 from the village hall car park south of the A4, almost directly opposite the proposed location of the new junction.</p> <p>I also take my young children south across the A4 to the play park using the traffic island just west of New Road Hill. This crossing is difficult to use already and will become more dangerous to pedestrians like my family and other families living on New Road Hill.</p> <p>Parking locally is also an issue with multiple cars regularly parking next to the sub station on the west side of New Road Hill where it joins the A4. These are cars of residents on New Road Hill and the Bath Road who simply have no other option. Will the development remove this opportunity to park? If so, the inevitable result will be more cars parking in increasingly dangerous and inconvenient locations. The development and resulting increase in cars within the village will exacerbate the parking issues further. During the development, will construction workers be provided with parking or will parking on New Road Hill increase further?</p>

	<p>Local School:</p> <p>The application makes little reference to the capacity of local schools. The Woolhampton CE Primary School was oversubscribed last year and with the Reed Garden development completed this situation will only become worse.</p> <p>We moved to this area 7 years ago to start a family in a village surrounded by beautiful countryside. The developments we have seen in the village are slowly chipping away at the beauty of the area and putting additional pressures on infrastructure and amenities that are already stretched beyond capacity in many cases.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Partridge, Matt
Consultee Full Name	Matt Partridge
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1045
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 15:26:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Despite significant objections, a petition containing 118 signatures, 39 formal responses and much visible opposition, it seems that we once more have to resist this proposal.</p> <p>Woolhampton cannot, and should not, be subject to yet another new build development, it is incredibly disappointing to see the open green space at the foot of New Road Hill, Midgham being included in the local plan for the development of 16 dwellings.</p> <p>Please refer to my previous significant objection dated 26/01/2021 against planning application 20/03028/OUTMAJ for my steadfastly unchanged views on the proposal, and I urge you to listen to the community whom you are here to represent.</p> <p>It is ridiculous that for now the fourth time we need to submit our reasons as to why this plot is not suitable, but I will add two more to the content of my previous submittal:</p> <p>During January 2023, during a prolonged period of significant cold weather, the brow of the New Road Hill 100 yards up from the A4 was completely covered in an ice sheet which remained there for over a week. It was insanely dangerous, and occurs every time there is a long cold spell. This is caused by water runoff from the field concerned during the day which freezes overnight. To build on this field would make an already dangerous problem significantly worse, with far more runoff due to less drainage.</p> <p>I joined the planning committee call on zoom for 20/03028/OUTMAJ - in, I believe May 2022 - as the public representative for the village, and I believe stated our case with the strength it deserved. During this call I made a comment that the section of A4 between Woolhampton Hill and the exit from the village to the west "is treacherous". I was not taken seriously, and was even mocked by one of the committee members for using that term, which although I took offence to at the time, I did not rise to.</p>

	<p>I refer you to an incident reported in the local press on 10th December 2022 which happened within yards of where the proposed access road is to the new site. Car do not simply drive into lamposts on a straight road. This crash was a direct result of the situation in this exact location, where the slip lanes are too narrow, the already existing junctions very close together, and the exit from a 30mph zone to national speed limit tempts far too many drivers to accelerate to unacceptably high speeds far too early despite the dangers.</p> <p>It is, as I stated at the time, and in my previous formal objection, a treacherous piece of road.</p> <p><i>Weblink inserted:</i> https://www.newburytoday.co.uk/news/update-crash-shuts-a4-9288865/</p> <p>There is NO support for this build in the local area, and MUCH opposition. Please remove this site from the local plan and listen to your residents.</p> <p>Do something constructive with this land instead. Develop it as a green leisure space, a solar field for a community power project, perhaps.</p> <p>We don't need more houses, and have received nothing in return as residents from the local government for those we have already absorbed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Marsh, Daniel and Victoria
<p>Consultee Full Name</p>	Daniel and Victoria Marsh
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1065
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 13
<p>Chapter / Policy / Appendix Title</p>	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
<p>Order</p>	107
<p>Submission Type * E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 13:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I am writing to object about the Local plan and specifically policy RSA13 / Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</p> <p>This site has previously been refused for development by WBC (Application reference 20/03028/OUTMAJ) , being unsuitable for residential development and outside the defined settlement boundary.</p> <p>Also advising a satisfactory conclusion could not be found to overcome the above.</p> <p>Nothing has changed and this proposed development site should finally be removed from the list of potential development sites.</p> <p>I wish to repeat a number of strong objections that I have in relation to the proposed development of greenfield space, at the western edge of Woolhampton village, application reference as above.</p> <p>As a close neighbour of the site of the proposed development, I am of the view that this will have a severe negative impact on the village and its inhabitants, detracting from their standard of living, and enjoyment of residing in Woolhampton.</p> <p>1/ Visual impact on village / character of the area. This paddock / open space forms part of the defined rural landscape on approach to the village from the West, creating clear definition between the village</p>

and open countryside. To develop / expand housing on this site will certainly detract from the small village feel currently enjoyed.

2/ Greenfield site / Wildlife. My understanding is that this is a greenfield site, which borders ancient woodland, to develop this site can only have a negative impact on the local wildlife and their habitat, regardless of any mitigating efforts put in place by the developers. Surely it would be better to develop a brownfield site locally, within a defined settlement boundary, where these issues would not be encountered.

3/ Overdevelopment. Woolhampton is a small village and would think most of the residents like it this way, that is why they live here. We currently have the new Reed Gardens development of 34 properties, (mainly 3 & 4 bedroom homes) along with new housing by Midgham station This will roughly equate to 150 more people in the village, a massive increase considering the village has less than 1000 inhabitants. To then add another 16 dwellings, roughly 50 more people added to the 150 above, is just not wanted, viable, or sustainable. It will have a large negative impact on local facilities and amenities.

4/ Noise and light pollution. There will be a significant increase in noise and light pollution both during any development and after completion. New Road Hill does not have street lights, and a lot of people prefer it like that for it's rural feel + it's much better for stargazing. Any development from a rural paddock will increase noise and light pollution, regardless of any mitigating action taken by developers, which will impact existing local residents. Sure this will not be good for the local wildlife in the paddock / adjoining woodland, and local area either.

5/ Parking issues. There are already parking issues with not enough parking spaces for existing Woolhampton residents. This is even more evident when friends and families are visiting. Locals who reside along the Bath Road and New Road Hill have been forced to park on the corner of the Bath Road and New Road Hill junction due to the lack of parking. (by the sub station) I have seen up to 8 vehicles parked there, and would have concerns if this space was no longer available, that people would be forced to park somewhere less safe and cause obstruction to others(pedestrians and road users).

6/ There is a plan to develop a significant site in Thatcham (SP16 & 17) of 3000 new houses, less than 2 miles away, which will more than cover requirements for any new housing in the immediate area.

In conclusion, I believe that this development is neither needed or wanted. I would be grateful if the council would take these objections into consideration, I will be happy to provide any further information should you have any questions.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	JPP Land Ltd (Represented by Woolf Bond Planning)
<p>Consultee Full Name</p>	JPP Land Ltd

Consultee Organisation	JPP Land Ltd
Agent Full Name	Mr Douglas Bond
Agent Organisation	Woolf Bond Planning
Comment ID	PS1542
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:49:00
Attached Files	PS1542 Woolf Bond (JPP Land) Committee Report_RSA13.pdf PS1542 Woolf Bond (JPP Land) Decision Notice_RSA13.pdf PS1542 Woolf Bond (JPP Land) Planning Statement_RSA13.pdf PS1542 Woolf Bond (JPP Land) RSA13 LPR Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	Yes

delivery of sustainable development in accordance with the policies of the NPPF.
 * Yes
 * No

Please give reasons for your answer

Introduction

We refer to the above consultation event and respond on behalf of our client, JPP Land Ltd. Our client's interests relate to land located north of Bath Road, Woolhampton. The site has a significant planning history, including its previous identification as a preferred allocation within the Draft Housing Site Allocations Local Plan (preferred option 15 – site ref WOOL001). This draft allocation indicated that the 0.83ha site could accommodate approximately 20 dwellings.

It is acknowledged that within the Draft Submission Local Plan, our client's land is included as a proposed allocation for approximately 16 dwellings (site ref RSA13) in policies SP14 and RSA13. We concur with the Council that the site is suitable for allocation, as assessed in Appendix 7 of the Sustainability Appraisal/Strategic Environmental Assessment alongside the Council's Housing and Economic Land Availability Assessment (HELAA) (December 2023).

The suitability of the site for residential development is further demonstrated by the technical evidence that was submitted to the Council as the planning application for 16 dwellings on the site (ref 20/03028/OUTMAJ). Whilst the application was refused by the Council on 21st September 2022, this was not on the basis on any technical reasons, rather this was due to the lack of a legal agreement alongside its current location outside of (but adjoining the settlement boundary). These are both factors which can readily be addressed, especially as through the Draft Submission Local Plan, the site is proposed for inclusion in the settlement boundary of Woolhampton.

Therefore, we reconfirm that the 0.83ha site is suitable for housing development comprising between 16 and 20 dwellings in a sustainable location as an extension to the settlement of Woolhampton. We consequently endorse its inclusion as an allocation in policy RSA13, subject to the response outlined in this statement.

The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period. This is supported by the Technical evidence which accompanied the recent planning application (LPA ref 20/03028/OUTMAJ). This therefore further supports the inclusion of the site as an allocation within the draft plan, subject to the response below.

National Planning Policy Framework (NPPF) and the Tests of Soundness

The NPPF (July 2021) sets out the principal components to be included in local plans. Paragraph 35 requires that in order to be "sound" a Development Plan Document ('DPD') should be positively prepared, justified, effective and consistent with national policy.

In order to be justified the DPD must be founded upon a proportionate evidence base and represent an appropriate strategy when considered against the reasonable alternatives.

Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the Statement of Common Ground.

The positive preparation test requires plans to as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical.

For the reasons set out in these submissions there are a number of potential matters that need to be addressed in future iterations of the emerging Plan. These are outlined following the relevant questions and supporting information within the consultation document.

Further matters - Comments on draft Policy RSA13 regarding the allocation of land north of Bath Road, Woolhampton

The draft policy indicates that the site is proposed to be allocated for a residential development comprising approximately 16 dwellings. On behalf of our clients, an outline application for the erection of 16 dwellings was submitted to the authority on 21st December 2020 and validated on 5th January 2021 (LPA ref 20/03028/OUTMAJ). This application was refused by the Council on 21st September 2022 for the following two reasons [see attachment 'PS1542 Decision Notice_RSA13' for decision notice]:

1. The proposed development is not on land identified as suitable for residential development. The application site is located outside of a defined settlement boundary, below the district settlement hierarchy, where there is a presumption against residential development. The site is not land that has been allocated for residential development. The proposed development is not for rural exception housing, to accommodate rural workers, or limited infill within a closely knit cluster of 10 or more dwellings. As such the proposed development is contrary to Policy C1 of the Housing Site Allocations DPD 2006-2026, the Council's strategy for locating new homes in Policies ADPP1, ADPP6 and CS1 of the West Berkshire Core Strategy 2006-2026, and the National Planning Policy Framework.

2. The application fails to provide a planning obligation to secure:

(a) on-site provision of 40% affordable housing, without which the proposal fails to comply with the National Planning Policy Framework, Policy CS6 of the West Berkshire Core Strategy 2006-2026, and the Planning Obligations SPD; and

(b) the provision, transfer (with commuted sum for maintenance) and governance of on-site public open space, without which the proposal fails to comply with the National Planning Policy Framework, Policy CS18 of the West Berkshire Core Strategy 2006-2026, Policies RL.1, RL.2 and

RL.3 of the West Berkshire District Local Plan 1991-2006 (Saved Policies 2007), and the Planning Obligations SPD.

The first reason is clearly addressed by the Draft Submission Local Plan which confirms its inclusion within the defined settlement boundary for Woolhampton alongside its identification as an allocation for approximately 16 dwellings through policy RSA13. The second reason for refusal can also be readily resolved through the preparation and agreement of a legal agreement, especially as when application 20/03028/OUTMAJ had been reported to committee, it was recommended for approval as all technical matters had been resolved. Whilst Councillors resolved to refuse the application as the site was not within a settlement, as explained this is resolved through the Draft Submission Local Plan.

Application 20/03028/OUTMAJ followed an earlier outline application (19/01942/OUTMAJ) for 16 dwellings on the site which was also refused by the authority on 23rd January 2020. The earlier application was determined by the authority before it agreed the Regulation 18 version of the Plan [*Footnote 1: Draft Local Plan Review December 2020, consulted upon from 11 December 2020 until 5 February 2021*] which included the site as a draft allocation (then policy RSA20, now policy RSA13). The most recent application was submitted during the Council's consultation on the earlier Draft Local Plan which ended in February 2021.

The technical information submitted with the current application confirms that development of the site could proceed with mitigation to address any potential impacts upon the adjoining Local Wildlife Site. The inclusion of a 15m buffer along the site's western boundary ensures development of the site also safeguards the ancient woodland which is the designated Local Wildlife Site. This is shown on the illustrative layout submitted with the application.

The Council's determination of application 20/03028/OUTMAJ confirms The Council's determination of the earlier application together with the technical information submitted with the current scheme highlight those matters which are most likely to be relevant for inclusion in a policy for the development of the site.

In contrast, the assessment of the site for the Local Plan (through the most recent Housing and Economic Land Availability Assessment (HELAA) (January 2023) does not fully take account of the information submitted for the application, which as confirmed in the determination of the proposal (LPA ref 20/03028/OUTMAJ) confirmed that there were no technical matters limiting development of the site.

The technical information submitted with the current application confirms that development of the site could proceed with mitigation to address any potential impacts upon the adjoining Local Wildlife Site. The inclusion of a 15m buffer along the site's western boundary ensures development of the site also safeguards the ancient woodland which is the designated Local Wildlife Site. This is shown on the illustrative layout submitted with the application [*see page 5 of attachment 'PS1542 Woolf Bond (JPP Land) RSA13 LPR Rep'*].

A review of the Council's appraisal of the land north of Bath Road, Woolhampton (MID4) within the January 2023 version of the HELAA is summarised below.

Stages 1a and 1b of the HELAA summarise the identification of the site and whether it is subject to an automatic exclusion. It is agreed that it is appropriate for site MID4 to be considered further within the HELAA.

Stage 2a includes consideration of "Development Potential". This notes that the site adjoins ancient woodland for which a buffer would be required and that it lies adjacent to an existing settlement boundary. The illustrative layout for 16 dwellings includes a buffer to the Ancient Woodland which lies to the west of the site. The Planning Committee Report on the most recent application (paragraph 6.79) [*see attachment 'PS1542 Woolf Bond (JPP Land) Committee Report_RSA13'*] confirmed:

An adequate buffer will be retained and protected to the adjacent woodland.

Therefore the matters within the "Development Potential" analysis can readily be resolved. This is illustrated by the Council's acceptance of the technical information for the earlier application alongside the proposed revision to the settlement boundary for Woolhampton associated with its allocation.

Stage 2b. This involves an assessment of suitability. Its overall conclusions are:

An ancient woodland (Great Mounts Copse) is immediately adjacent to site, suitability of site depends on appropriate avoidance and mitigation measures. Further ecological studies required.

Further landscape assessment required.

High risk of adverse nature conservation impacts.

Although these are noted, the Council accepted through the most recent planning application that these were all matters which could readily be addressed and not undermine its suitability.

Under availability within step 2c, this was accepted.

The achievability of the site (Step 2d) was also accepted.

The overall conclusion within the HELAA for the site (Step 2e - Deliverability) was that it was "potentially developable". The conclusions were:

The site is available (in single ownership and there is an option agreement with a developer) and achievable as there are no known market, legal, cost, ownership fragmentation or delivery issues.

An ancient woodland (Great Mounts Copse) is immediately adjacent to site, suitability of site depends on appropriate avoidance and mitigation measures. A buffer will be required between the ancient woodland and development.

There are a number of factors which would need to be investigated further to confirm that the site is developable - further landscape assessment required, and high risk of adverse nature conservation impacts and further ecological studies required.

Whether the site is considered developable is also dependent on further assessment through the plan-making process, in relation to whether circumstances exist to support the change to the settlement boundary.

The technical matters detailed above were all satisfactorily resolved and confirmed through the Council's determination of the most recent application (20/03028/OUTMAJ). As noted, there were only two reasons for refusing the application, the first being its location outside of a settlement boundary. Through the Draft Local Plan, this is amended and therefore the Council's analysis of the site through the HELAA together with the applications confirm the suitability of the site.

The annexe to this statement provides further details of the response to the HELAA appraisal of the site, having regard to the information submitted with application 20/0028/OUTMAJ, which was accepted by the authority.

The Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) for the site (within appendix 8b (page 50)) concludes:

The site is likely to have an overall neutral impact on sustainability. Positive sustainability impacts are identified in relation to social sustainability as the site would help to meet local housing needs as well as being close to local services and facilities accessible by walking and cycling, with opportunities for public transport close by. Potential negative sustainability impacts have been identified in relation to environmental sustainability as the site is close to a number of ecological designations. A number of unknown sustainability impacts have also been identified. Many of these may be able to be mitigated but further would be needed to determine what would be required.

Whilst negative impacts are identified on environmental sustainability, these relate to matters which were highlighted as issues within the HELAA (Ancient Woodland, ecology). As noted, these were all resolved and accepted by the Council in determining the earlier application.

The other evidence prepared by the Council is summarised in the conclusions of the HELAA and SA/SEA and this therefore confirms its suitability. The draft policy concerning development of the site (RSA13) therefore broadly reflects the conclusions of these documents. The draft policy is proposed to read:

The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:

- a. The provision of approximately 16 dwellings in a scheme that provides a mix of dwelling types appropriate to the local area;**
- b. Access to the site will be provided from A4 Bath Road;**
- c. Main internal walking and cycle routes for the site will be provided and will be linked to existing routes including the Public Rights of Way network; and**
- d. The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA);**
- e. The scheme will be informed by an Ecological Impact Assessment (EcIA). F. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected;**
- f. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy;**
- g. Measures will be included to improve accessibility by, and encourage use of, non-car transport modes. These measures will be set out in a Travel Information Pack;**
- h. Provide an appropriate buffer of at least 15 metres between the development and ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development;**
- i. A desk-based assessment to better understand archaeological potential and survival will be required. Subject to the results of the assessment, a field evaluation may be required;**
- j. An odour assessment will be required due to the nearby location of the Woolhampton Waste Water Treatment Works;**
- k. Part of the site is underlain by aggregate mineral deposits and a Minerals Resource Assessment will be required; and**
- l. A Construction and Operations Management Plan (COMP) will accompany any planning application on the site. The COMP will safeguard the oil pipeline from operational works, including the provision of an appropriate buffer.**

The only matter referenced in the policy which does not directly stem from the sites evaluation in the HELAA and SA/SEA is clause j. It is noted that this is derived from the conclusions of the Water Cycle Phase 2 – Outline Study (September 2021), primarily section 7. This states with respect to “odour assessments”:

7.1 Introduction

Where new developments encroach upon an existing Wastewater Treatment Works (WwTW), odour from that site may become a cause for nuisance and complaints from residents. Managing odour at WwTWs can add considerable capital and operational costs, particularly when retro fitted to existing WwTWs. National Planning Policy Guidance recommends that plan-makers consider whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure, due to the risk of odour nuisance. Phase 1 highlighted six sites that may be risk of nuisance odour, no new sites were identified in Phase 2. For completeness the sites identified in Phase 1 are listed below.

7.2 Results

Table 7.1 identifies the six sites within West Berkshire which fall within 800m of WwTW. The 800m buffer does not take into account the size of the works, the treatment processes present or the condition of the WwTW which can all affect the magnitude of the odour. Where there is already urban area closer to the treatment works than the proposed site, the nature of odour on the new site is likely to be known and reported so these sites represent are lower risk. There are no proposed sites which are closer to the WwTW than existing urban areas. Sites that are given an amber assessment will not necessarily experience nuisance odour but should undergo an odour assessment as part of the planning process.

The appraisal then lists the 6 sites where odour assessments should be considered. One of these is MID4 as confirmed in the table below (copy of Table 7.1 from the Phase 2 Study) [see page 9 of attachment 'PS1542 Woolf Bond (JPP Land) RSA13 LPR Rep'].

Alongside a lack of consideration of wind direction, there is also no explanation with respect to the reasons why 800m is the relevant distance from an existing treatment works for determining potential odour issues.

Taking account of these factors, it is not considered that this element of the policy is justified, as the evidence base is flawed. Either all the allocations associated with the sites listed in Table 7.1 of the Phase 2 Study should be subject to the requirement to provide an odour assessment or non should be.

To reflect the approach of the Plan for the Lower Way, Thatcham site allocated in policy RSA5 and listed in Table 7.1, clause j of policy RSA13 should therefore be omitted.

The annex to this statement explains the reasons why heritage and minerals assessments are not required within the policy.

The inclusion of our client's land north of the Bath Road in Woolhampton as envisaged by draft Policy RSA13, whilst assisting in the enhancement or maintenance of the vitality of rural communities as required by the NPPF (paragraph 78), will also contribute towards the minimum of 10% of housing allocations to meet the district's overall housing need on a site of less than 1ha, as required by paragraph 69.

The overall conclusions of the Phase 2 Study in paragraph 7.3 regarding Odour was:

Six sites across West Berkshire are close enough to a WwTW for there to be a risk of nuisance odour. If these sites were to be allocated in the Local Plan Review, and odour assessment is recommended as part of the planning process, funded by developers. The remaining sites have been given a rating of green. (my emphasis)

Although the table indicated that 6 sites were identified for consideration of odour assessments, the detailed sites schedule which accompanied the Phase 2 document only lists our clients site at Woolhampton as necessitating an odour assessment. This is notwithstanding the inclusion of the site on land at Lower Way Farm, Thatcham (THA9) as a housing allocation through policy RSA9 of the Local Plan. The table above confirms that this site should also be subject to the obligation to provide an odour assessment.

Since it is not the closest of the six sites to the treatment works and more importantly, is unlikely to be affected since the prevailing wind direction is from the south-west, ensuring any odour releases are blown away from the site north of Bath Road. The prevailing wind direction is illustrated by the wind rose for RAF Benson which confirms the prevalence of wind from the south-west [Footnote 2: The site in Thatcham included as an allocation is closer] and more importantly, is unlikely to be affected since the prevailing wind direction is from the south-west, ensuring any odour releases are blown away from the site north of Bath Road. The prevailing wind direction is illustrated by the wind rose for RAF Benson which confirms the prevalence of wind from the south-west [Footnote 3:RAF Benson lies approximately 25km NNE of Woolhampton].

RAF Benson meteorological station wind rose (2019). [See page 10 of attachment 'PS1542 Woolf Bond (JPP Land) RSA13 LPR Rep'].

Alongside a lack of consideration of wind direction, there is also no explanation with respect to the reasons why 800m is the relevant distance from an existing treatment works for determining potential odour issues.

Taking account of these factors, it is not considered that this element of the policy is justified, as the evidence base is flawed. Either all the allocations associated with the sites listed in Table 7.1 of the Phase 2 Study should be subject to the requirement to provide an odour assessment or non should be.

To reflect the approach of the Plan for the Lower Way, Thatcham site allocated in policy RSA5 and listed in Table 7.1, clause j of policy RSA13 should therefore be omitted.

The annex to this statement explains the reasons why heritage and minerals assessments are not required within the policy.

The inclusion of our client's land north of the Bath Road in Woolhampton as envisaged by draft Policy RSA13, whilst assisting in the enhancement or maintenance of the vitality of rural communities as required by the NPPF (paragraph 78), will also contribute towards the minimum of 10% of housing allocations to meet the district's overall housing need on a site of less than 1ha, as required by paragraph 69.

Representation

The approach of policy RSA13 is therefore unsound as it is not justified. This especially relates to criteria i to k of the policy.

Conclusion

Whilst we concur with the Council's inclusion of our client's land north of Bath Road, Woolhampton as an allocation for around 16 dwellings in policies SP14 and RSA13, for the reasons outlined in the statement, the Local Plan as draft is currently unsound. We therefore object to the Local Plan.

The objection to the plan can readily be resolved through the omission of criteria i to k of policy RSA13 for the reasons outlined.

Summary

We welcome the opportunity to open up dialogue with the Council in order to further proposals and the formulation of the detailed policy requirements associated with the allocation of our client's land as currently envisaged in policies SP14 and RSA13.

Annex detailing response to HELAA assessment

1. Development potential.

The first section of the HELAA deals with development potential. The Assessment highlights site specific issues which could affect capacity as relating to the ancient woodland and the need for a buffer. The illustrative scheme within application 20/03028/OUTMAJ includes such a buffer, consistent with Natural England guidelines, with a depth of 15 m. In withdrawing reason for refusal 3 in connection with the previous application, the Council now confirms that the site can be developed without harm to the ancient woodland.

The Assessment assumes a density of 30 dwellings per hectare and an estimated development potential of 20 dwellings. This contrasts to the more sensitive and agreed lower density of 19.4 dwellings per hectare and the 16 dwellings proposed.

2. Suitability

Under relevant planning history, the HELAA references the two earlier applications, as noted in the statement.

It also records the site being assessed as "potentially developable" in the 2013 strategic housing land availability assessment as recorded above. The Council's assessment notes that:

"During the site selection work for the Housing Site Allocations Development Plan Document, the site was recommended as an option for allocation in the Housing Site Allocations (HSA) DPD because it was well connected to existing settlement, close to local services and facilities.

At preferred options the Parish Council commented that development of the site would extend the village westwards. Concern was also raised over additional traffic movement on to New Road Hill. The Parish Council stated a preference for WOOL006 to be allocated for development."

Application 20/03028/OUTMAJ did not include an access onto New Road Hill. Whilst the proposal would "extend the village westwards", the alternative site was extending the settlement eastwards. There is no distinguishing difference between the principle of such an extension. In any event, the proposal is contained by a mature woodland block which screens and encloses the site from the more open and wider landscape further to the west. In this sense the suggested extension of the village is not out into the wider open countryside but up to a very well established and contained landscape feature. The relationship of the scheme to this landscape feature is also respected.

In respect of location (settlement hierarchy, relationship to settlement boundary) the HELAA Assessment notes that the site is adjacent to the settlement of Woolhampton, an identified Service Village that has a more limited range of services and "some limited development potential". The reference to the settlement having a limited range of services fails to acknowledge the significant, higher order, railway station within Woolhampton. The Assessment records that the site adjoins the settlement boundary on the northern and eastern sides. The A4 Bath Road together with a community facility, car park, allotments and some frontage dwellings lie to the south and south east.

The HELAA Assessment confirms that development on the site would not result in harm to the AONB.

In respect of highways and access, the Assessment confirms the position in respect of the planning applications that there are no objections to the proposed means of access off the Bath Road, no significant impact is expected in respect of local highway capacity, and Highways England has advised that individually, the site would be unlikely to materially impact on the operation of the strategic road network.

In respect of flooding, the Assessment confirms that the site lies within flood zone 1 with a low probability of flooding.

No issues are raised in relation to surface water, ground water flood risk and the Council's drainage officer confirms that the site is suitable for development.

The Assessment confirms that the site is not defined as public open space and that there is no requirement for additional public open space provision over and above development plan policy requirements.

The Assessment confirms that the site has not been identified as Local Green Space which reinforces the point that the site is not significant in townscape terms.

In respect of agricultural land, the site is classified as non-agricultural land. This is hardly surprising given the well contained nature of the site, and its divorced nature from the more open and usable countryside further to the west, all of which point to the site being of limited use other than paddock land on the settlement edge.

The Assessment under the heading air quality, pollution and contamination refers to the location of the site adjacent to the A4, with possible Nitrogen Dioxide and Particulate Matter from construction and operational impacts, and possible contamination and high risk of noise and vibration problems to future residents from the A4. It is relevant to note that no such objections were raised in relation to the planning application in respect of these matters. Furthermore, the site allocated and under construction at the eastern end of the village shares a similar frontage relationship onto the Bath Road. These are not therefore considered determinative issues.

In respect of potential adverse nature conservation impacts, the Thames Valley Environmental Research Centre highlights the site lying within 500m of priority habitats, ancient woodland, European protected species, priority species, statutory sites, SSSI Impact Risk Zone and local wildlife sites.

The Berkshire, Bucks and Oxon wildlife Trust highlight a number of potential impacts to these interests in the absence of any avoidance or mitigation measures. The planning application includes appropriate avoidance and mitigation measures such that the only outstanding nature conservation impacts relate

to bats and dormice surveys. The surveys submitted to the Council as part of the planning application 20/03028/OUTMAJ confirm that these do not present a constraint to the development of the site in the manner proposed. The Council's withdrawal of reason for refusal 3 to an earlier application confirms this too.

The 15m buffer zone also confirms appropriate avoidance and mitigation to the nearby ancient woodland. In respect of whether development would be appropriate in the context of existing settlement form, pattern and character of the landscape, a generic passage from the West Berkshire Landscape Character Assessment (2019) is set out in the HELAA. This could apply to any edge of settlement field thereby precluding any form of development at the edge of a sustainable settlement within the identified settlement hierarchy.

The site-specific comment does recognise the fact that there is existing residential development to the east and north of the site. It records: "Western boundary of the site nearby open countryside is well screened by mature trees. Further landscape assessment required". This does not rule out the development having regard to this consideration. "Further landscape assessment required" comes in the form of the application Landscape and Visual Impact Addendum report that accompanies this Statement.

The Assessment confirms no harm to or loss of significance to any designated heritage assets.

In terms of designated heritage assets, a desk-based archaeological assessment together with some possible fieldwork techniques may be necessary. However, the determination of the earlier application has not identified any such interest. The Planning Statement (paragraph 4.41) [*see attachment 'PS1542 Woolf Bond (JPP Land) RSA13 Rep'*] also notes that whilst heritage has been identified as a potential matter to be reviewed, this was not identified in the Council's earlier determination of applications 19/01942/OUTMAJ and 20/03028/OUTMAJ.

In terms of minerals and waste, it is noted that the site lies within an existing and proposed mineral safeguarding area. As the Planning Statement which accompanied application 20/03028/OUTMAJ confirms (paragraph 4.41):

The site could not reasonably be quarried in a standalone respect due to its limited area and the need to ensure appropriate buffers to the residential properties, oil pipeline and ancient woodland within or adjoining the site. However, should any minerals be observed on site during construction, these can be sent to a local processor rather than sent to landfill [*Footnote 4: It is understood that quarries within West Berkshire can accept such limited quantities of minerals for processing.*]. Again, this could be dealt with by condition. Consequently, mineral extraction is therefore not a constraint for the site.

This flexibility should be acknowledged within any policy although as explained above, this is not considered to be a relevant factor for the determination of the earlier application.

The suitability conclusions refer to the need for appropriate avoidance and mitigation measures in respect of the ancient woodland, the potential high risk of adverse nature conservation impacts. These have now been addressed as confirmed in the recent ecological survey report and Council's withdrawal of reason for refusal 3 to the earlier application. The only outstanding matter therefore relates to a further landscape assessment. This as noted was provided with application 20/03028/OUTMAJ and considered acceptable to the Council. Therefore as demonstrated by the application, the scheme and consequently the site is acceptable in landscape character terms.

The Assessment confirms that all other sites at the edge of Woolhampton are unsuitable, leaving the application site as the only suitable site at this sustainable Service Village, which the HELAA confirms is suitable and capable of accommodating additional development. To not support additional meaningful development at Woolhampton, bearing in mind the level of existing transport infrastructure (in particular the railway station), would not be sustainable.

3 and 4. Availability and Achievability

The HELAA confirms that the site is immediately available and achievable with no new issues constraining the development of the site. This representation and the current planning application reaffirm this matter.

5. Deliverability

Within this section of the HELAA the Assessment confirms that the site is available, achievable, potentially developable in part owing to a buffer required joining the ancient woodland on the western site boundary, with suitability unknown due to the outstanding nature conservation surveys and landscape assessment, both of which are now addressed through this application.

Concluding remarks on 2023 HELAA

Overall, the Council's most recent Assessment highlights the suitability of the site even for a higher level of development than that proposed through the application 20/03028/OUTMAJ. The lower number of dwellings proposed allowed for the appropriate identified mitigation and avoidance measures to be incorporated, in particular in relation to the ancient woodland buffer. The outstanding nature conservation constraints are now resolved through the recent season sensitive bat and dormice surveys, whilst the submitted Landscape and Visual Impact Assessment Addendum to the current application addresses landscape impact. That said, the acknowledgement of the well contained nature of the site confirms the landscape and visual impact is limited. Moreover, the planning officer's report on the earlier application confirms that "the presence of housing would be conspicuous in public views, albeit localised and filtered (to varying degrees) but would inevitably be an intrinsic change to the character of the area (the site) in this location".

There can be no doubt that with virtually every greenfield site the presence of housing would be conspicuous in public views, but in this case, it is acknowledged that these would be "localised and filtered". Furthermore, the change from a greenfield site to a housing development, albeit set within a settled and mature landscape, would bring about a change, however, the degree of change in this case is limited, as well as that change being well related to existing built form seen in the same context of the

	<p>site. This too reduces further the extent of change and impact to a level that is judged by the applicants to be acceptable.</p> <p>It is clear that the Council's determination of applications 19/01942/OUTMAJ and 20/03028/OUTMAJ has reviewed the various factors which would need to be addressed to enable residential development of the allocation to proceed.</p> <p>Although the HELAA and SA/SEA have listed other issues, it is evident that planning application 20/03028/OUTMAJ (including the material submitted with it) have addressed these. Council's provisional identification of heritage, minerals and odour as potential factors for development of the site should consequently not be incorporated into the specific expectations of the authority within the policy of the draft Submission Local Plan.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	To resolve the objection to policy RSA13, we advocate that criteria i to k of the policy are omitted.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To clarify the adjustments to policy RSA13 of the Local Plan
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Madders, Carly
Consultee Full Name	Carly Madders
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS919
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>I have no access to a printer so unable to print form but please accept this as objection for the development of the land at the bottom of New Road Hill, Woolhampton.</p> <p>I object due to the increase amount of traffic in and out onto the main A4 and the dangers this will incur, particularly in the winter weather. Woolhampton is a beautiful village and we are constantly losing green land to more houses. Our school is small and can not accommodate all these houses.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1840
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below> The site is on SPZ3
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1792
Chapter / Policy / Appendix Number	Policy RSA 13
Chapter / Policy / Appendix Title	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
Order	107
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn NDP Steering Group
Consultee Full Name	Lambourn NDP Steering Group
Consultee Organisation	Lambourn NDP Steering Group
Agent Full Name	
Agent Organisation	
Comment ID	PS442
Chapter / Policy / Appendix Number	Policy RSA 14
Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 09:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This comment is submitted by Lambourn Parish Council and the Lambourn Neighbourhood Development Plan:</p> <p>Policy SP15: Sites allocated for residential development in NWD AONB. Site RSA14/HSA19: Land adjoining Lynch Lane, Lambourn:</p> <p>The developers of the site have had pre-planning discussions with WBC and have held meetings with Parish Councillors. To make the development viable they have stated they wish to build a larger number of houses on the site than 60 (100+) and reduce the number of (locally much-needed) affordable houses.</p> <p>This site, so close to the River Lambourn SSSI/SAC and within the River Lambourn NNZ, is particularly sensitive. Taking into account the developer's expressed intentions and the need to put in place mitigation for nutrient neutrality, Lambourn Parish Council/Lambourn Neighbourhood Development Plan does not believe this policy is deliverable over the Plan period.</p> <p>WBC has not sought to find alternative sites for this allocation. The LPR requires the LNDP to find "additional sites", not alternatives.</p> <p>Following local, informal public consultation, a suggestion has been put forward that this site might accommodate fewer houses (possibly 30).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Thames Water
<p>Consultee Full Name</p>	Thames Water
<p>Consultee Organisation</p>	Thames Water Utilities Ltd
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS998

Chapter / Policy / Appendix Number	Policy RSA 14
Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure. The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments

on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1144
Chapter / Policy / Appendix Number	Policy RSA 14
Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Objection</p> <p><u>(Emerging) Policy HSA 20 (formerly RSA 19 Site LAM005) (Reg 19 site RSA14) Lynch Lane, Lambourn</u></p> <p>Our Clients have made representations elsewhere that the housing provision in the Plan is inadequate and extra sites should be included, in particular our Client's Site formerly known as "Land between Folly Road, Rockfel Road and Stork House Drive (SHLAA site reference LAM007)".</p> <p>However if the Council considers that extra sites are not required then LAM007 should be included instead of sites HSA 19 or more particularly HSA 20 in the Draft LPR document.</p> <p>RSA 22/HSA19 has the disadvantage of being a very large site for the village to accommodate. The capacity of the site has risen arbitrarily since the 2014 Preferred Options document and yet the constraints have increased. The Draft LPR introduces new constraints about nutrient neutrality etc. The site lies alongside an SSI/SAC and part of the site is liable to flooding from the River Lambourn which flows along the northern boundary. No work was carried out on a number of aspects including archaeology before its previous allocation. It appears that the site capacity has arbitrarily increased by 4 units from 56 in the 2014 document to 60 in the adopted document and the LPR notwithstanding that the LPR now reduces the developable area, merely so that, together with site RSA23/HSA20, it tried to compensate for the unjustified omission in this version of the Plan of site LAM007 which was previously included.</p> <p>The Summary of Lambourn Sites previously noted the negative points in relation to environmental sustainability and flooding. The need for a buffer zone and the inability to develop within the flood zone appear to reduce the size and capacity of the site and not to increase it as was previously suggested (from 56 to 60) in the adopted DPD. The LPR now omits a developable area, the implication being that this has decreased.</p> <p>When the site was proposed in the adopted Plan the Parish Council within their response included the following key points:-</p> <p><i>"Environment -the site is within the AONB. The site is immediately adjacent to the River Lambourn, the corridor of which is a Site of Special Scientific Interest.</i></p> <p><i>Housing and the Community – Lambourn needs a period of consolidation to adjust to the social impact resulting from recent rapid growth.</i></p> <p><i>Industry – impact on the racehorse industry– safety of horses and riders will be affected by increased traffic generation</i></p> <p><i>Archaeology – Lambourn formed part of the parkland of Lambourn Place, and the site is believed to be a site of a Saxon palace. Any development would destroy this.</i></p> <p><i>Roads – roads are narrow, with blind bends and dangerous junctions. Inadequate footpaths and the roads are busy. Any increase in traffic will be detrimental to the safety of the road users".</i></p> <p>These matters have not been satisfactorily addressed.</p> <p>The Lambourn Site Assessments document, in its summary notes that "the Parish Council had various concerns about this site, as does the local community". Indeed this was the least favoured site for development by the residents responding to the survey.</p> <p>Since being selected for the last Local Plan and accepted by the Inspector in April 2017 the site has not come forward.</p> <p>No applications have been made for its development.</p>

	It does not appear to be genuinely available and should now be omitted from the emerging Draft LPR. <i>The Plan's approach to the selection of sites is not justified.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	Please see other submissions on this specific point <See Rep: ID1170>
4. Proposed Changes	The Draft LPR's approach to the selection of sites is not justified. Land adj. Lynch Lane has not come forward for development since its inclusion in the former Plan in April 2017. Further the detailed examination of Policy RSA22 now HSA19 means that it may not be delivered in future either or may only delivered with reduced capacity and area. Our Clients would prefer that Site RSA22/HSA19 is now omitted. Failing this its capacity should be significantly reduced. However if there is a need for additional housing then our Client's site formerly LAM007 Land off Rockfell/Folly Road should be included as a site to ensure that the Local Plan Review is both sound and effective.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We do not consider the LPR is sound and would like to participate in the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn Parish Council
Consultee Full Name	Lambourn Parish Council
Consultee Organisation	Lambourn Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1129
Chapter / Policy / Appendix Number	Policy RSA 14
Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web

Response Date	02/03/2023 09:24:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>This comment is submitted by Lambourn Parish Council and the Lambourn Neighbourhood Development Plan:</p> <p>Policy SP15: Sites allocated for residential development in NWD AONB. Site RSA14/HSA19: Land adjoining Lynch Lane, Lambourn:</p> <p>The developers of the site have had pre-planning discussions with WBC and have held meetings with Parish Councillors. To make the development viable they have stated they wish to build a larger number of houses on the site than 60 (100+) and reduce the number of (locally much-needed) affordable houses.</p> <p>This site, so close to the River Lambourn SSSI/SAC and within the River Lambourn NNZ, is particularly sensitive. Taking into account the developer's expressed intentions and the need to put in place mitigation for nutrient neutrality, Lambourn Parish Council/Lambourn Neighbourhood Development Plan does not believe this policy is deliverable over the Plan period.</p> <p>WBC has not sought to find alternative sites for this allocation. The LPR requires the LNPD to find "additional sites", not alternatives.</p> <p>Following local, informal public consultation, a suggestion has been put forward that this site might accommodate fewer houses (possibly 30).</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1812
Chapter / Policy / Appendix Number	Policy RSA 14
Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Thakeham notes that this site was allocated in the 2017 Site Allocations Plan where the policy states "This site is expected to delivery early and to contribute immediately to the supply of land needed to demonstrate a five year housing land supply". Despite this, the site has not commenced, and successive Annual Monitoring Reports fail to give any justification. As stated elsewhere in these representations, the Council should not just allow these allocations to roll forward unless there is a reasonable prospect of them being delivered, or at least supporting them with additional allocations should they continue to prove undeliverable, with sites that are demonstrably available, suitable and deliverable, such as the Site at Wantage Road, Lambourn.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	<p>Yes</p>

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1793
Chapter / Policy / Appendix Number	Policy RSA 14
Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited

Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1818
Chapter / Policy / Appendix Number	Policy RSA 14
Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	Turley (Hathor Property) Table.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

<p>Please give reasons for your answer</p>	<p>Delivery of Proposed residential site allocations</p> <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been 'carried over' from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Following an initial review of this progress, the table below lists those sites where there has been no progress or where progress has stalled are listed in the table below <i>[for table in full, see attachment 'Turley (Hathor Properties) Table']</i>, along with a review of their current planning status.</p> <p>Retained allocation from Core Strategy: Land adjoining Lynch Lane, Lambourn. 60 dwellings</p> <p>Planning status: No planning application submitted at the current time.</p> <p>Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period.</p> <p>The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Environment Agency</p>
<p>Consultee Full Name</p>	<p>Judith Montford</p>
<p>Consultee Organisation</p>	<p>Environment Agency</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1841</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy RSA 14</p>

Chapter / Policy / Appendix Title	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
Order	110
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is partly Flood Zone 2+3. River Lambourn SAC and SSSI approx 25m from site. Principal bedrock aquifer and secondary aquifer</p>

	<p>Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. East Shefford STW has a 0.1mg/l stretch target for P. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. We would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. As with Newbury or any site with stretch targets for Phosphorous, any additional loading may impact their ability to meet the environment act objectives.</p> <p>As stated in our suggested amendments and notes on Policy DM7, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA14.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1145
Chapter / Policy / Appendix Number	Policy RSA 15
Chapter / Policy / Appendix Title	Land at Newbury Road, Lambourn (Site Ref: HSA 20)
Order	112
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	No

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Objection.</p> <p><u>Policy Site Ref HSA 20/(Emerging Policy)RSA 23. Now site RSA15 Formerly LAM015 Newbury Road Lambourn</u></p> <p>Site HSA 20/RSA 23 should be deleted and replaced by our Clients previously preferred Option Site "Land between Folly Road, Rockfel Road and Stork House Drive" (SHLAA site reference LAM007). Site HSA 20/RSA 23 has not commenced development since being allocated in April 2017. Indeed planning permission was refused that year because:-</p> <p>"1. Notwithstanding the fact that the application forms part of the HSADPD 2017 as adopted, the applicant has failed to enter into a s106 planning obligation to achieve an appropriate contribution, for affordable housing of £400,000, in accord with policy CS6 in the West Berkshire Core Strategy 2006 to 2026. It is thus contrary to policies GS1 and HSA20 in the HSADPD of 2017 and policy CS6 as identified and the advice in the NPPF".</p> <p>Please see application17/00825/FULD and the refusal notice dated 19th October 2017.</p> <p>A further application has been made to develop the site for eight houses (20/00972) which has been approved but apparently is not going ahead as a further application has been made (22/00277) for only five units - but that remains undetermined..</p> <p>In the 2017 application the Parish Council and Natural England objected because of the visual impact on the landscape. There was no information on flooding and archaeology and there were highways problems with bin storage, the need to move a bus stop and the lack of a foot path across the entire site frontage. No affordable housing was provided.</p> <p>This fact and the abandonment of the scheme for eight houses rather suggests that the site is not practical or economic to develop.</p> <p>Application ref.20/00972/FULMAJ was amended from 10 to 8 dwellings which exceeded the Local Plan density.</p> <p>The principal problem with the development is stated to be the effect on the wider landscape character of the area, in particular against the underlying objective to conserve and enhance the landscape character of the AONB. The proposed development due to its high density of dwellings is thought to form a hard settlement edge, which will be out of character with the adjacent settlement edge characterised by a low density of development in mature gardens. The proposals are currently considered to result in an adverse effect on the wider landscape character of the AONB.</p> <p>Policy HSA20/RSA 23 is a very small, inflexible site and makes little contribution to housing supply (five dwellings). It appears to have been included (and the notional capacity of HAS 19/RSA 22 increased) merely so that our Clients site LAM007, previously included as being acceptable, could be excluded.</p> <p>Policy HAS 20/RSA 23 (or LAM015) was not examined in the West Berks Landscape Sensitivity Assessment by Kirkham Landscape Planning.</p> <p>The reference to the site in The Lambourn Site Assessment was both cursory and inadequate.</p> <p>The Parish Council were not consulted (apparently it appears neither were statutory consultees).</p> <p>HAS 20/RSA 23 scored poorly when compared against the criteria in the settlement boundary review. It was accepted that it forms an extension of the existing settlement boundary.</p> <p>HAS 20/RSA 23 was selected at a late stage and has no identifiable feature to create its northern boundary. There is no landscaped boundary. It is on a ridge and can be described as an open area on the edge of the settlement seen at the entrance to the village. It also lies close to the Medieval Village of Bockhampton.</p> <p>Policy HAS 20/RSA 23 should be deleted and our Client's site formerly LAM007 "Land between Folly Road, Rockfel Road and Stork House Drive" (SHLAA site reference LAM007) should replace it.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Please see other submissions on this specific point <See Rep: ID1170></p>
<p>4. Proposed Changes</p>	<p>Site HAS 20/RSA 23 should be omitted. It did not go through the rigorous consultation process or selection procedure applied to other sites such as our Client's LAM007. Its impact on the landscape was never adequately assessed. It is further from services than LAM007 and has a number of other disadvantages. It is not practical or available for development currently.</p> <p>The inclusion of HAS 20/RSA 23 would undermine the Plan and would mean that it is both unsound and ineffective</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We do not consider the LPR is sound and would like to participate in the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS999
Chapter / Policy / Appendix Number	Policy RSA 15
Chapter / Policy / Appendix Title	Land at Newbury Road, Lambourn (Site Ref: HSA 20)
Order	112
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p>

	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Environment Agency
<p>Consultee Full Name</p>	Judith Montford
<p>Consultee Organisation</p>	Environment Agency
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1842
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 15
<p>Chapter / Policy / Appendix Title</p>	Land at Newbury Road, Lambourn (Site Ref: HSA 20)

Order	112
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on principal bedrock aquifer and secondary aquifer</p> <p>Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. East Shefford STW has a 0.1mg/l stretch target for P. East Shefford is an exceptionally high spilling site, mostly due</p>

	<p>to Ground Water infiltration. We would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. As with Newbury or any site with stretch targets for Phosphorous, any additional loading may impact their ability to meet the environment act objectives.</p> <p>As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA14.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA14.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	Historic England
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1794
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 15
<p>Chapter / Policy / Appendix Title</p>	Land at Newbury Road, Lambourn (Site Ref: HSA 20)
<p>Order</p>	112
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
<p>Response Date</p>	03/03/2023 11:13:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	No

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1000
Chapter / Policy / Appendix Number	Policy RSA 16
Chapter / Policy / Appendix Title	Land North of Southend Road, Bradfield Southend (Site Ref: BRAD5)
Order	114
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rivar Ltd (Represented by Pro Vision)
Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS1534
Chapter / Policy / Appendix Number	Policy RSA 16
Chapter / Policy / Appendix Title	Land North of Southend Road, Bradfield Southend (Site Ref: BRAD5)
Order	114
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 11:47:00
Attached Files	PS1534 Pro Vision (Rivar) RSA16 Landscape Plan.pdf PS1534 Pro Vision (Rivar) RSA16 Landscape Study.pdf PS1534 Pro Vision (Rivar) RSA16 Location Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the	

<p>area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>In summary, Rivar, in principle, support the allocation of the 'Land north of Southend Road, Bradfield Southend' for residential development. However, there are concerns with some of the criteria.</p> <p>Land north of Southend Road, Bradfield Southend</p> <p>Pro Vision is instructed by Rivar Ltd to submit representations in response to the West Berkshire Council ('the Council') Regulation 19 Consultation on the proposed submission version of the Local Plan Review (LPR) to 2039, herein after referred to as the 'the Plan'.</p> <p>Background</p> <p>Specifically, this representation is made in relation to our client's interest at Bradfield Southend and 'Land north of Southend Road'. We have previously submitted this site to the Council as part of the 'Call for Sites (CfS)' exercise and is identified in the Council's Housing and Economic Land Availability Assessment (HELAA) as site ref: BRAD5. The whole site (c. 2.24ha) was promoted for residential development of approximately 30 dwellings and the HELAA concludes that the site is 'potentially deliverable in part'.</p> <p>Policy SP15 of the Plan identifies part of the 'Land north of Southend Road, Bradfield Southend' as a site allocation for approximately 20 dwellings. A site-specific Policy is included at Policy RSA16.</p> <p>Rivar, in principle, support the allocation of the 'Land north of Southend Road, Bradfield Southend' for residential development in Policies SP15 and RSA16. We also support the increase in the capacity of the site to around 20 dwellings which is considered more appropriate given the site context and anticipated developable area.</p> <p>However, we have concerns regarding some of the specific criteria and wording in the site allocation Policy RSA16.</p> <p>Conclusion</p> <p>The site is suitable, available, and achievable for around 20 new homes, in a timely and sustainable manner. It is considered that the site is a developable option for the following reasons:</p> <p>a) There is a need to identify a range of scale of sites for housing in West Berkshire to meet the indicative housing requirements during the plan period. Due to its scale, the Site can be built out quickly in accordance with paragraph 69 of the Framework.</p> <p>b) Bradfield Southend is identified as a 'service village' in the settlement hierarchy and, therefore, a suitable location for reasonable additional growth.</p> <p>c) The site would adjoin the existing built-up area and is considered an appropriate extension to Bradfield Southend and in-keeping with the direction of growth in accordance with recently approved developments.</p>

	<p>d) Residential development in this location would be in keeping with the surrounding area and would not unduly compromise the purposes of the AONB.</p> <p>e) The provision of additional tree planting provides an opportunity to provide a robust boundary to the settlement and provide landscape and ecological enhancements.</p> <p>f) Further opportunity to deliver new areas of green infrastructure and the creation of areas of green amenity/open space, including biodiversity benefits.</p> <p>g) The site is located in Flood Zone 1 (i.e. low probability of flooding) and a sustainable drainage system would be provided.</p> <p>h) The development of the site will assist in supporting local facilities and other business services in the village through an uplift in population and their associated increase in local expenditure.</p> <p>i) The site is in close proximity to key local facilities and services available. Future residents would therefore benefit from these existing services.</p> <p>j) A vehicular access can be delivered along the existing commercial roadway via Southend Road.</p> <p>k) The scale of development proposed is capable of delivering housing in line with local objectives, such as need for affordable housing.</p> <p>l) The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.</p> <p>m) The site is available for a residential development immediately. The development land is within single ownership and Rivar has agreed to purchase the land. Rivar enjoys a reputation for building high quality homes in desirable locations throughout central southern England and is based in Newbury. In recent years, Rivar has delivered a range of sized housing schemes across West Berkshire.</p> <p>n) Furthermore, as far as we are aware, there are no factors which would prevent this site coming forward for residential development.</p> <p>Rivar would be willing to enter into a Statement of Common Ground with the Council to support the site's allocation at the examination stage. The proposed amendments to the criteria could be dealt with through minor modifications.</p> <p>We trust this Statement clearly sets out our client's position at this stage and respectively request that the above is given due consideration as part of the West Berkshire Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>Site-specific criteria</i></p> <p>A number of the criteria simply require information to be submitted with any planning application (i.e. criteria b. c. d. e. g. h.) or require consideration of other policies in the Development Plan.</p> <p>For ease and clarity, these could be removed as the criteria are covered by other relevant policies in the Plan and by local validation list requirements. The criteria could instead focus on the key matters that will shape development of the site.</p> <p><i>Criteria f - A substantial tree belt will be provided along the northern boundary, linking to the existing tree belt to the north of the site, on the eastern boundary and with new planting on land at Stretton Close;</i></p> <p>Rivar support the principle of the criterion and to create a strong defensible boundary to this part of the village. However, the site allocation boundary (i.e. red line) as shown on the accompanying plan (pg 118 of the Plan) does not extend to the existing northern tree belt. As such, this could potentially lead to uncertainty for decision-makers.</p> <p>As a result, the red line/site allocation boundary should be extended up to the existing northern tree belt to assist, particularly as it forms part of the objective of the policy and site allocation. See Site Location Plan appended to this letter for the suggested revised red line [see attachment 'PS1534 Pro Vision (Rivar) RSA16 Site Location Plan'].</p> <p>A Landscape Opportunities and Constraints Assessment prepared by Enderby Associates was submitted to the Council in June 2021 following discussions on the draft allocation – see enclosed [see attachment 'PS1534 Pro Vision (Rivar) RSA16 Landscape Study']. An extract of the landscape plan is included below to assist. This demonstrates how this criteria can be achieved with a substantial linked tree belt/landscape buffer to the north of the site allocation boundary</p> <p>Figure 1. Extract of Opportunities and Constraints Landscape Plan [see attachment 'PS1534 Pro Vision (Rivar) RSA16 Landscape Plan']</p> <p>Criteria i - Main internal walking and cycle routes for the site will be provided and will be linked to existing routes;</p> <p>Whilst Rivar support the principle of improving pedestrian and cycling connectivity with the village, it is not clear what the Council is trying to achieve with this criteria in this case. This criteria fails to consider the site and village context and the relatively modest proposed scale and rural character of development.</p> <p>Accordingly, the criteria should be re-worded to 'improved pedestrian and cycle access will be provided including connections to local routes where feasible'.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>Yes</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1843
Chapter / Policy / Appendix Number	Policy RSA 16
Chapter / Policy / Appendix Title	Land North of Southend Road, Bradfield Southend (Site Ref: BRAD5)
Order	114
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ2+3, secondary A superficial aquifer</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy RSA 17 Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Scrimgeour, (Represented by Lisa Jackson Planning)
Consultee Full Name	Mr and Mrs Scrimgeour
Consultee Organisation	
Agent Full Name	Mrs Lisa Jackson
Agent Organisation	Lisa Jackson Planning
Comment ID	PS96
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	17/02/2023 10:44:00
Attached Files	PS96 Attachment - Alternative plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	NA
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Positively Prepared The plan has not been positively prepared as the allocation RSA17 does not accommodate the need for a new burial ground at Chieveley. Indeed, the allocation of this site entirely for housing will remove the last available suitable site within the village for a burial ground requirement as set out in the adopted parish plan (2011). This requirement is confirmed in the evidence base of Sustainability Appraisal (SA). The objection to Reg 18 plan from the Parish Council confirmed that part of the site was required for a burial ground. The need for a burial site was restated at the Chieveley Parish Council meeting on 14/02/23. Whilst this social need was identified it was not considered in the Sustainability Appraisal informing the local plan when considering the social sustainability of the site. The complete lack of commentary on this would suggest this issue has not been considered and the plan has not been positively prepared with the impact on the community considered at all, despite the previous objection from the Parish Council and my clients. This is unacceptable.</p> <p>Furthermore, the sequential test in Strategic Flood Risk Assessment on flooding considered both residential and burial ground uses with a note that this was promoted by the developer. The sequential test went on to allocate the site for housing development, but the policy in the Regulation 19 version does not include the burial ground. Given the developer was proposing this, and the Parish Council supported this use the plan has not positively reflected the developers/ Parish requirements. Given a change of use application would be required for the burial ground an allocation in the local plan would protect and secure this for the community and create a positive policy securing social sustainability.</p> <p>Justified The plan is not justified by evidence. The allocation of RSA17 entirely for housing is the wrong strategy for this settlement. It would not be sustainable to deny the provision of a new burial ground in the village, it would require funerals (for those residents who choose burial) to be conducted outside the village which forces bereaved families to have to travel by car to other settlements with burial grounds or could force residents to choose cremation for their loved ones as burial will be denied the residents if this development proceeds as currently set out in the plan.</p> <p>The Sustainability Appraisal (SA) suggests that the allocation will not impact on the vitality of the village, however, there is no reference to provision of burial facilities and the need to protect sites for this which are limited due to groundwater issues. Allocation of RSA17 for housing only is not a reasonable alternative, when part of the site is required as a burial ground. The SA states "<i>Positive sustainability impacts are identified in relation to social sustainability</i>" given the loss of a potential burial ground this statement is not true. Social sustainability will be damaged if a burial site cannot be located within the village.</p> <p>The multiple access points shown on the plan accompanying the policy will destroy the frontage ancient hedgerow. The policy is not justified by evidence to show that visibility splays on multiple accesses will not destroy the hedgerow, especially given the bend in the road. Natural England and AONB unit said: "<i>The strong rural character of East Lane should be conserved via retention and reinforcement of the hedgerow if possible. Building height will be important.</i>"</p> <p>Caveat (b) of the policy requires the visibility splays of 2.4 x 43 m. The policy map shows 5 access arrows. If each one of those five access arrows has a visibility splay to the above standard there will be no frontage hedge left. In addition the western most arrow would require visibility over my client's land, so is not acceptable, as it is not available, and the development cannot be achieved as shown on the plan.</p> <p>In addition, the policy at point (c) requires a footway fronting the site. This would remove the entire frontage hedge to achieve such a footway. This policy caveat is not justified by evidence that this will not destroy the frontage hedge.</p> <p>Consistent with National Policy Policy RSA17 is inconsistent with NPPF 73. This requires that planning policies should ensure that new homes can be provided in extensions to existing villages where they are well located and supported by the necessary infrastructure and facilities. Caveat a) to this national policy requires the council to consider opportunities presented for planned investment in infrastructure. The policy does not identify the well-established and planned requirement by the community for infrastructure of a burial ground to serve the wider community. The 2011 Chieveley Parish Plan (a document produced with significant community input) identified significant community support for a new burial ground in the Parish, <u>over a thousand residents</u> who responded, supported the proposal.</p> <p>Likewise, Policy are RSA17 is inconsistent with NPPF 84d). This requires that Planning Policies should support a prosperous rural economy by enabling the development of community facilities. The lack of a policy for the burial ground, and an allocation for housing on the only site suitable for a burial ground is contrary to this policy.</p> <p>Policy RSA17 is inconsistent with section 11 of the NPPF, which seeks to make effective use of land. Paragraph 119 requires that Planning Policy is so promote an affective piece of land in meeting the need for homes and safeguarding and improving the environment and ensuring safe and healthy living conditions. The site shape and frontage would support well over twenty dwellings. An allocation of 15 units is not making effective use of land of this site of 1ha+. NPPF124 b), at 15dph this is below an</p>

	<p>acceptable density and does not optimise use of the site. The housing site needs to be reduced in size by allocation of the northern section as a burial ground as shown on the attached alternative plan.</p> <p>The policy RSA17 is not consistent with National Policy as set out in National Planning Policy Framework (NPPF) the Council's own evidence confirms that the site will have a negative landscape impact on the AONB, as set out in the SA. This is inconsistent with NPPF 176 which requires great weight to conserve and enhance landscape and scenic beauty in the AONB.</p> <p>Policy RSA17 is not consistent with National Policy in NPPF176 as access to the site as proposed multiple access points (item b in the policy) and as shown on the policy map would result in the almost entire loss of the frontage ancient, banked hedge on East Lane to achieve visibility and the footpath described at (c), this would harm the natural beauty of the AONB. In addition, it is not consistent with NPPF180 as the effect of the policy would destroy an ancient hedgerow creating significant harm to biodiversity if the site were developed as shown on the policy map and described in the policy text.</p> <p>Policy RSA17 is not consistent with NPPF 195. The development of the site could harm the settings of three listed buildings namely Old House, Tudor Cottage and Coombe House. It would also impact the setting of the Chieveley conservation area. This is confirmed in the Council's own evidence in the SA which states: "<i>Development has the potential to result in harm to the listed Old House and the setting of Tudor Cottage and Coombe House</i>". The policy wording "(g) development, design and layout will be further informed by heritage impact assessment". The allocation of the whole site for residential development, given potential harm to heritage is not justified. Given advice in the SA as there has been no assessment of impact on heritage assets, more protection is required for the heritage assets as set out in the alternative policy wording.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>No comment</p>
<p>4. Proposed Changes</p>	<p>See 'PS96 Attachment - Alternative Plan'</p> <p>An alternative policy is required to overcome the tests of soundness.</p> <p>The new policy wording should be as follows:</p> <p>Land at Chieveley Glebe, Chieveley (site Ref CHI23) The site showing on the map is proposed to be allocated for a community burial ground (for circa 200 burial plots) and for residential development of up to 15 dwellings. The site will be accessed from a single point of access which will serve both the proposed dwellings and burial-ground which will have a small informal carpark to accommodate 10 cars that could also serve overspill from the Downland General Practice. 15 dwellings will be located to the east of the site and will front East Lane but will be served by a single slip-road to protect the integrity of the ancient hedge and trees along the frontage, which will be retained. The large Sycamore to the west of the site will be retained. A footway will be located inside the hedge boundary. Significant screening in the form of a new biodiversity corridor to the north of the site shall be planted to protect long views and the settings of the adjacent listed buildings, this screen planting shall be between 6 - 10 m in depth along entire rear boundary of the site and will provide an area for biodiversity net gain. Dwellings will be single storey to protect long views on this ridge site to protect the natural beauty of the AONB.</p> <p>The following parameters will apply:</p> <ul style="list-style-type: none"> a) Single point of access from East Lane with a- visibility splay of 2m x 43m to a slip road to serve the whole development. b) A footway will be located inside the site behind the existing hedge c) Additional pedestrian access points may be made to East Lane where the existing trees and hedge is not compromised d) Traffic calming pinch point with/ crossing point installed on East Lane to connect new footway from the site with existing path to the west of site (south of East Lane) e) Sustainable Travel measures will be set out in a travel pack f) The detailed design will be informed by an LVIA g) The scheme will be informed by an ECIA h) The scheme will be informed by a Heritage Impact Assessment i) The site will need to demonstrate nutrient neutrality j) The development will need to deal adequately with both surface and foul water k) A noise survey would be required as part of a planning application <p>The attached diagram (or similar) should replace the current policy map to ensure that the development solution achieves the right balance of uses on the site, achieves strategic landscape mitigation and visual containment to the north, and achieves protection of the frontage hedge.</p> <p>Furthermore, the plan shows how the setting of the Old House (Grade II listed building) will be protected by additional planting on the west of the site and retention of the 100year + Sycamore.</p> <p>The alternative plan shows how access will be achieved by a single point serving a slip way to protect the ancient hedge. A footway adjacent</p> <p>This alternative plan would support a sound policy for the site, as the current plan and policy wording have not planned positively for the settlement and would not achieve a well-designed place so would</p>

	not be consistent with NPPF 127, as the plan does not set out a clear vision for the site and has not included the community requirements for the design policy on this site as expressed both by local residents and the Parish Council.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The oral examination will allow my clients to explain why the policy is unsound as presently drafted and explain how the policy is not compliant with national policy. The examination will allow my clients to present the sound alternative policy that meets the proper definition of sustainable development and meets the requirements of the NPPF where local communities influence development outcomes to make them more acceptable.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Campbell, David
Consultee Full Name	David Campbell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS90
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	10/02/2023 10:39:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	No

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<ol style="list-style-type: none"> 1 The suggestion of 5 separate access points, two of which are on a relatively narrow bend in East Lane, and close to where vehicles currently park by the surgery, is a very poor idea. I assume each access would service at least 3 of the proposed maximum of 15 dwellings? 2 A single access opposite the entrance to Hazeldene (the 2nd proposed access from the west end of the proposed development site) provided with an enlarged road area with roundabout would provide the safest road/traffic access. The road should then extend back and behind all accepted developments along the northern boundary of the site (as similarly was done with properties accessed at Hazeldene (away from Est Lane itself). 3 The number of dwellings (detached/semi-detached/terrace, bungalows not specified in plan?) seems too many for the area. This is especially so if to be a single row and intended to match other existing properties along the north and mostly south side along East Lane. 4 The proposals suggest a footway fronting the site linking to an existing footway to the west of the site. This is on the opposite side of the road and would require a pedestrian crossing for safety (not mentioned). 5 How is it proposed to encourage non-car transport modes given we have almost no public transport, and main roads to nearby towns are hardly safe for bicycle modes of transport? 6 The proposals states that the "site will be required to be developed in accordance with the following parameters". These include a wide range of assessments which the document says will inform the development. Surely no approvals can be granted for such a development until such assessments have been made, detailed site plans brought forward, etc. As written it implies that some level of approval for a development at the site can be granted without detailed assessments and investigations beforehand. We have little faith in the value or adoption of some of likely assessment requirements given the past situation at the current local showground site where two restrictive covenants issued with planning approval were very quickly ignored/changed or just forgotten! 7 A pedestrian walkway/pavement is desperately needed all along East Lane, and with increased traffic rarely keeping to the current 30 mph speed limit – it should be 20 MPH and with speed bumps in the road. The increased traffic associated with the proposed development (could amount to at least 25-30 extra vehicles just with the development) coupled with existing traffic using the Downland practice facilities, as well as through traffic to/from Chieveley centre and beyond makes these road improvements essential. 8 Access onto to the old Oxford Rad from East Lane (east end) is poor (bad sighting) especially as speeds often exceed the newly introduced 50MPH limit along the old Oxford Road. There will be

	<p>a serious accident at this junction one day, with many vehicles turning into East Lane from the north and south, and others trying to access onto Oxford Road.</p> <p>9 How does the proposed development tie in with a proposed burial site on the land?</p> <p>0 Car parking would need to be available for the burial site.</p> <p>1 A public pathway from the development area directly to the recreational ground would be a major benefit to the increased population in East Lane.</p> <p>2 Adequate hedging and tree planting should be considered.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>1 A single access opposite the entrance to Hazeldene (the 2nd proposed access from the west end of the proposed development site) provided with an enlarged road area with roundabout would provide the safest road/traffic access. The road should then extend back and behind all accepted developments along the northern boundary of the site (as similarly was done with properties accessed at Hazeldene (away from Est Lane itself).</p> <p>2 The proposals suggest a footway fronting the site linking to an existing footway to the west of the site. This is on the opposite side of the road and would require a pedestrian crossing for safety (not mentioned).</p> <p>3 A pedestrian walkway/pavement is desperately needed all along East Lane, and with increased traffic rarely keeping to the current 30 mph speed limit – it should be 20 MPH and with speed bumps in the road. The increased traffic associated with the proposed development (could amount to at least 25-30 extra vehicles just with the development) coupled with existing traffic using the Downland practice facilities, as well as through traffic to/from Chieveley centre and beyond makes these road improvements essential.</p> <p>4 Car parking would need to be available for the burial site.</p> <p>5 Adequate hedging and tree planting should be considered.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Avery, Chris
<p>Consultee Full Name</p>	Chris Avery
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS554
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 17

Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 21:52:00
Attached Files	PS554 Chris Avery attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	I do not believe that the paln corrcrectly applies the considerations set out in the AONB designation
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>This note is with respect to the plan to zone the Glebe land in East Lane Chieveley for housing. East Lane is completely unsuitable for such development and the adjustments required to make this proposal viable will destroy the existing character of the lane and seriously impact the nature of the existing settlement.</p> <p>The house in which I currently live was built by my grandparents and my family have long-standing associations with Chieveley. The village used to feel part of the wider downland landscape and in only a few strides from the high-street you would be able to see the fields and agricultural land surrounding</p>

	<p>the settlement. Gradually, over the years, there has been a creeping infill. I am sure that individually, at the time, these areas of development seemed entirely rational and justifiable but the result has been that nearly all of those views have now gone. This section of East Lane is the last remaining place where you can still do this. The result is that Chieveley is losing its character as a downland village and is becoming, in essence, an urban environment. I do not believe that this can have been the intention of the AONB designation nor do I believe that the small advantage to the village of having these few extra houses can justify the loss incurred by allowing this development to take place.</p> <p><i>(attachment - previous planning response)</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>I do not believe that the area identified is appropriate for the proposed development. I do not believe that this proposal can be made viable. If it is considered that further dwellings are required in Chieveley alternatives will need to be considered.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Avery, Patricia</p>
<p>Consultee Full Name</p>	<p>Patricia Avery</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS673</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy RSA 17</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)</p>
<p>Order</p>	<p>116</p>
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	<p>Web</p>

Response Date	03/03/2023 12:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	See below
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>In my view the proposal is not in line with recent trends. The road is a country lane with green fields and hedgerows. These hedges are over 60 years old and are regarded as ancient hedges, therefore irreplaceable and should not be removed.</p> <p>The trees date back to at least the 1800s and according to The Woodland Trust should be regarded as veteran trees and accordingly come under Planning Policy 9 Biodiversity and Geological conservation which requires Local Authorities to avoid loss of aged and veteran trees under the Rural communities Act 2006.</p> <p>The root system of these trees should be protected and no parking or access should be allowed 12 times the trunk diameter as this could cause compaction to the root system.</p> <p>Also the road is not wide enough to cope with this increase in traffic. The proposal states that measures will be included to improve use of non car transport but without a good public transport system I fail to see that this could be accomplished at the present time or in the near future.</p> <p>It is also a problem getting a doctors appointment and also I know first hand that it is not always possible to get children into the primary school. I therefore cannot see how this proposal would be an advantage to anyone.</p> <p>I feel we should all be trying to keep the areas of outstanding natural beauty intact for future generations.</p>

	Chieveley is a lovely village but now has few leafy lanes left. I therefore feel strongly we should keep our beautiful places sacrosanct. I do not feel that this development is in accordance with the AONB designation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	I do not consider that the proposal to set aside the Glebe land in Chieveley for housing is appropriate given the AONB designation or that it is, in fact, a viable proposal given the unsuitable nature of the site.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1001
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p>

	<p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Crundwell, Stephen
Consultee Full Name	Stephen Crundwell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1028
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am emailing you in response to the consultation with regards the site allocated for residential development in Chieveley on Glebe Land, East Lane for 15 dwellings. I have tried to respond via your online portal but found it hard to navigate so I am emailing you instead.</p> <p>One of the reason I moved to East Lane was that it was not overlooked and has views of the fields at both the front and rear giving me the privacy I was looking for. My privacy will be compromised as I will be overlooked by many of the proposed properties. This would also impact my visual amenity in this area of outstanding natural beauty. There are also ancient hedgerows beside this land and the road on East Lane which is used by many birds as observed by myself some birds nesting in this stretch of hedgerow. Looking at the plans for the 15 dwellings this hedgerow will be removed in 5 areas to allow access to the dwellings which will destroy most of the ancient hedgerow and will have a negative effect on many of the birds that nest in the hedgerow.</p> <p>For a small village I feel the traffic on East lane is already excessive due to people who live outside the village using the Downland Doctors Surgery. More houses will increase the road traffic and as I haven't seen any plans for the buildings I would wonder if the driveways for these new buildings will have adequate parking for the owners vehicles so that they would not be using East Lane to park on, causing safety issues and a general nuisance.</p> <p>East lane suffers from surface water when it rains and this also causes large areas of water to form in my driveway even though my drive is gravel. The proposed land is also much higher than that of the level of the road and I feel that if this development goes ahead the rain water that is already being dispersed in the field will be vastly reduced causing more surface water on the road and will ultimately find its way in my boundary causing me problems which I will have to resolve</p> <p>On the West Berkshire council website a Landscape Charter Assessment was undertaken by Kirkham Landscape planning ltd and The Terra Firma Consultancy Ltd for development on this site in 2011. https://info.westberks.gov.uk/lca In the report it states</p> <p>Impact on Key Visual Characteristics.</p> <ol style="list-style-type: none"> 1. Localised impact on views to the countryside from the village 2. Loss of the open countryside setting of the village 3. Development would be prominent in views from the road and countryside to the north. <p>Impact on key settlement characteristics</p> <ol style="list-style-type: none"> 1. Development of this whole site would be out of keeping with existing settlement pattern, which is characterised by small estates, with houses closely associated with the main roads <p>In the report it also states that Development on this site would result in harm to the natural beauty of this area of outstanding natural beauty and that this site as a whole should not be pursued as a SHLAA site. It would not be possible to repeat the linear pattern of the rest of Chieveley without developing along the rural road to the east, which would harm the countryside setting on the east side of the village</p> <p>In the response to the west Berkshire Landscape Sensitivity Assessment dated March 2011 all the observations were agreed with and it was considered inappropriate for development and should not be pursued as a SHLAA Site.</p> <p>In another document it states that building on this land (CH1011) will have an impact on the open countryside landscape character from a development on this site which would be significant. There would also be a loss of grade 2 agricultural land. It also states that the development of this site would result in harm to the natural beauty of ANOB. Also in this document it list many other sites in chieveley that are developable which should be considered.</p> <p>As this proposed site has already been assessed previously and the conclusion was that it should not even be considered for development then I would like to know why it is being proposed for development now.</p> <p>With regards the building of these 15 dwellings there will be a significant disruption to this small village due to the delivery of building supplies the removal of waste and also the works taking place. East Lane as I had previously stated is a busy road due to the downland doctors surgery, this build would have an impact on their patients visiting this surgery</p> <p>There will also be a considerable amount of dust and noise due to this build which will impact local residents as well as wildlife. There will also be an impact to the nights sky with regards sky glow for the new dwellings this could also have an impact of night time wildlife as bats are know to be in the area as witnessed by myself. I believe there is also a tree preservation order on the proposed site which would be a habitat for many species of wildlife which must also be considered.</p> <p>I trust you will consider my comments with regards this development and look forward to your response.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Snook, Tracy
Consultee Full Name	Tracy Snook
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1180
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:36:00
Attached Files	PS1180 Tracy Snook 1994 Plan.pdf PS1180 Tracy Snook PRow Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Firstly, disappointed that West Berkshire Council have progressed this site without actioning the local community feedback and needs outlined in the Chieveley Parish Plan nor the local concerns and information shared. A few to mention; burial ground, protect the old hedgerow and trees, road safety in lane and junctions with the High Street and Oxford Road, flooding and parking issues.</p> <p>RSA17 (RSA26) Previously CHI23</p> <p>Originally the whole field and a burial ground with access from Oxford Road was put forward by the Diocese but was dismissed at HELAA early stages (CHI023) but then at some point became 'change to proposed use' classification but only for the current site area now proposed. No mentioned of a burial ground included which was pointed out in the consultation December 2020- February 2021.</p> <p>Burial Ground</p> <p>Chieveley Parish Plan, endorsed by West Berkshire Council, identified that 57% of residents wanted a burial ground as it was recognised that St Mary's Church Burial Ground was running out of space. The land proposed in RSA17 (RSA26) was felt to be the best location for a burial ground. The burial ground could be accessible through the site and run along behind the Old Vicarage on the west side of the site.</p> <p>A historical plan drawn up by the Diocese in 1994 for the whole field shows one access off East Lane [see attachment 'PS1180 Tracy Snook 1994 Plan']. Something positive to consider here.</p> <p>4 accesses are excessive and should be avoided due to sightlines that will be required involving the destruction of an old hedgerow and established trees and how it will impact on the Doctor Surgery parking and street scene. Also means a footway fronting the site (c) will not be required which is unnecessary urbanisation in a rural village as people can cross the road to the south side by the Doctors Surgery which has a footway on the south side and links to the centre of the village and PROWs.</p> <p>The site land sits higher than the lane and houses opposite.</p> <p>Using a percentage of this site for a burial ground will affect the West Berkshire Council parameter for the provision of 15 dwellings (a).</p> <p>Chieveley did a Housing Needs Survey which captured the local housing need and should be used to guide on the housing mix for this site.</p> <p>PROW</p> <p>In the Parish Plan 82% valued the PROWS.</p> <p>The Diocese 1994 historical plan showed a new footpath through the proposed site and across the Diocese land to the Recreational Centre land to improve the community infrastructure links and to other PROWs in the area. A great idea and supports the WBC Infrastructure Development Plan by improving links. This should be included more specifically as a local parameter rather than lost under the generic (d) parameter for the village.</p> <p>Essential that this site does not close off PROW infrastructure improvements for the village for its future growth. As custodians of the village for future generations we have to consider the impact of what happens now for the future growth of the village.</p>

	<p>It will be essential to help form links to the Recreational land for the new housing and villagers using CHIE/2/2 & CHIE/4/1 and East Lane to get to community facilities and should be specified in the parameters [see attachment 'PS1180 Tracy Snook PRoW Plan'].</p> <p>The Diocese clearly thought to offer PROW infrastructure improvements and a burial ground back in 1994 and with the recent original call for site consultation process. This should positively be encouraged in discussions with the landowner and safeguarded by including it in the WBC site parameters.</p> <p>In summary</p> <p>A percentage of this site should be zoned and classified as a burial ground to be transferred to the Parish Council. A burial ground accessible through the site and zoned along behind the Old Vicarage on the west side of the site.</p> <p>Access to be limited to one main access to serve the new housing and burial ground.</p> <p>A housing mix using the Housing Needs Survey.</p> <p>A new PROW created through the site and across to the Chieveley Recreational Centre to improve off road connectivity between community facilities for the villagers and to accommodate future village growth for future generations beyond 2039.</p> <p>It is good that a village has an element of new development and growth as it is healthy. It has to be done in a careful measured way to meet the community's needs as it grows.</p> <p>Please can West Berkshire Council give more weight to the Parish Plan to support community goals through Local Plan Reviews.</p> <p>(attachments)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Grayson, Pamela
<p>Consultee Full Name</p>	Pamela Grayson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1121

Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	I have been reviewing the plan for this site and just wanted to raise a couple of points that concern me about it for you to consider: <ul style="list-style-type: none"> The full stretch of the boundary that is by the road in East Lane is currently established hedgerows, grass verges and some trees which are habitats and natural corridors for the local wildlife – including different species of birds and insects, this should be protected.

	<ul style="list-style-type: none"> • Currently there are five access points on the plans, one opposite the doctors surgery car park entrance and two on the corner. These in particular concern me from a road safety point of view (for other car users and pedestrians) and the number of entrances concerns me from the point of view of trying to maintain as much of the hedgerow as possible. • It mentions a footway fronting the site, which I don't see is possible alongside the road as there doesn't seem to be enough space for one alongside the hedgerow as it is quite a narrow road anyway. • This is already a busy road with the doctors being along it (and it gets even busier when the other main road through the village is closed and traffic is diverted). People park outside the doctors on the road throughout the day as there is not enough room in the car park, or to visit the pharmacy. Putting more houses down this road will increase the amount of traffic that goes down this road and neighbouring roads, which can already be quite dangerous to walk along and sometimes drive along. I personally walk along this road with my two small children to do the school and nursery run every day (one of the perks of living in a village) and it can already be a scary experience. The idea of increasing the number of cars does concern me from a road safety aspect for the pedestrians who use it on a daily basis and for other car users.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1164
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	As the Council will know, it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As a result of the lack of Conservation Area Appraisal and insufficient heritage assessment, currently we regard RSA17 as unsound because it is not based on proportionate evidence as required by paragraph 35 of the NPPF. We advise that proportionate heritage assessment is done on RSA17 at this stage to inform this allocation. We note the proposed criterion: "The development design and layout will be further informed by a Heritage Impact Assessment;" Leaving aside the redundancy of the word "further", we assert that the evidence base for this allocation is currently insufficient. Chieveley conservation area does not currently have a conservation area appraisal. We advised in our letter of 5 February 2021 that a conservation area appraisal is needed as part of the plan-making process (i.e. prior to allocation), to inform development on this site. Our letter of 5 Feb recommended as a minimum that heritage impact assessment (HIA) is needed to inform the allocation. HIA would enable further consideration of the relationship between the site and nearby heritage assets, inform the approach to

	<p>hedgerows (identified in the HELAA site assessment) and check some of the details in the HELAA, which states that Tudor Cottage and Coombe House are listed.</p> <p>The Sustainability Appraisal in Appendix 8b also notes that "The site is likely to have a negative impact on heritage assets as the site is adjacent to the conservation area with a number of listed buildings" and that "Survey work would be required and mitigation measures may be required."</p> <p>Also, we note the HELAA site assessment recommends that some archaeological work to be undertaken, but this is not included in the criteria. We suggest it is added.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p><u>Evidence base</u> More detailed heritage assessment to inform the allocation, which may result in amendments to the policy</p> <p><u>Policy RSA17</u> Proposed additional text:</p> <p><u>The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</u></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tucker, Toby & Jayne
Consultee Full Name	Mr & Mrs Toby & Jayne Tucker
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1173
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)

Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 21:30:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Ref: CH123</p> <p>We are writing to you to object to the above reference.</p> <p>We are the owners of <personal details removed> which sits opposite the land in question. Our family have lived in this dwelling for 75 years and have enjoyed the pleasant country outlook at the front and rear of our house.</p> <p>We have the following concerns if the proposed development was to be actioned:</p>

	<ul style="list-style-type: none"> The potential destruction of the mature hedgerow and trees along East Lane. The ancient hedgerows and trees provide a vital habitat for wildlife and contribute significantly to our outlook and the character of the surrounding area, which will be a significant loss for us and the community. East Lane is already a high traffic zone mainly due to the positioning of surgery. Having additional houses will only add to this equalling in additional pollution from noise, vibration, light and exhaust emissions. It is not safe or practical to have multiple driveway access points onto East Lane due to the sharp bend and height of traffic activity. If a development was approved, we would like to suggest that a road entrance be considered opposite Hazeldene that could also serve access to the potential burial ground and additional parking for the surgery. This single access point could serve all while also preserving the ancient hedgerow, trees and most importantly the character. Light pollution from the proposed development will affect the intrinsically dark landscape of the countryside. Although social housing must be considered, we recommend that dwellings be located in 'like for like' manner, with ideal placement being towards Hazeldene. We feel it is crucial to protect East lane and open space for generations to come and strongly urge you to consider all the points above.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Although social housing must be considered, we recommend that dwellings be located in 'like for like' manner, with ideal placement being towards Hazeldene.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Diocese of Oxford
Consultee Full Name	Mr David Mason
Consultee Organisation	Diocese of Oxford
Agent Full Name	
Agent Organisation	
Comment ID	PS872
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)

Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	<i>Consultations undertaken by the Council Following government guidelines</i>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	<p><i>None to make it legally compliant.</i></p> <p><i>The Diocese of Oxford has noted the Parish Council's comments in relation to Policy RSA17 Land at Chieveley Glebe, Chieveley (Site Ref: CHI23), and in particular the reference to a need for a new burial ground.</i></p> <p><i>The Diocese would be happy to consider gifting some land to the Council for use as a burial ground [location, access and size to be determined], as part of the proposal to allocate part of the glebe land for housing development. We specifically support the provision of social rented housing.</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1844
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A and principal bedrock aquifers</p> <p>This site would require a Flood Risk Assessment which demonstrates requirements of NPPF and PPG. This is due to its size (greater than 1 hectare). This requirement should be included in the list of requirements for assessing and developing the site.</p> <p>Developments connecting to Chieveley STW may be problematic as it discharges into The River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. Mitigation of additional load will need to be secured before any development can proceed.</p> <p>As stated in our suggested amendments and notes on Policy DM7, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA17.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chieveley Parish Council
Consultee Full Name	Kim Lloyd
Consultee Organisation	Chieveley Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1459
Chapter / Policy / Appendix Number	Policy RSA 17
Chapter / Policy / Appendix Title	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
Order	116
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:04:00
Attached Files	PS1459 Chieveley Parish Council - attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Chieveley Parish Council broadly supports a number of aspects of the Proposed Submission Local Plan including the overall vision and strategic objectives of the plan, policies supporting the conservation and enhancement of the AONB, the settlement hierarchy, and the need for some development in villages such as Chieveley where it is acceptable in terms of visual impact in the AONB to support local needs. The Parish Council also considers that, of the sites potentially developable at present, Land at Chieveley Glebe, Chieveley identified at Policy RSA17 is most likely to be acceptable. It also supports several criteria listed at RSA17 points (a) to (i). That said, Chieveley Parish Council agrees with the Council and its landscape assessment that the larger area of land at RSA 26, which was previously shown in the December 2020 document and the HELAA, should not be developed.</p> <p>Chieveley Parish Council still does not agree, however, that the strategy is appropriate with regard to a number of aspects of the Policy RSA17 Land at Chieveley Glebe, Chieveley allocation.</p> <p>The specific objections which lead the Parish Council to conclude that, as it stands, Policy RSA17 is not justified are set out below.</p> <p>Having regard to these objections the Parish Council believes the allocation is not in accordance with the following policies of the NPPF:</p> <ul style="list-style-type: none"> • NPPF para 126 – there are specific design aspects arising from this allocation and it is not clear how these are to be resolved and/or tested. • NPPF para 127 to 130 – despite these aspects having been raised previously, the vision, expectations and assurances for this site still lack clarity in the context of these sections of the NPPF. • NPPF para 93 and 96 - <i>To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should ... plan positively for the provision ... of community facilities ... and other local services to enhance the sustainability of communities and residential environments.</i> The opportunity exists here to provide a much-needed community facility in the form of a burial ground, although there appears to be support for this by the community and promoter, it is not provided for in the supporting text of the policy. • NPPF para 100 - <i>Planning policies ... should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks ...</i> This opportunity is also currently being missed. As described further below, the means of achieving the required footpath improvements along the frontage of the site are unclear and a unique opportunity for much needed enhancement to connectivity with the recreation ground which had been proposed by the promoter of this site previously, with a similar scheme, has been overlooked entirely. <p><u>The size of the allocation and number of dwellings</u></p>

No site area is specified in the Proposed Submission LP document, but the December 2020 Emerging draft stated for the same site: *The site has a developable area of approximately 1.1ha, which is acceptable in landscape terms...*

The HELAA January 2023 - Figure 3.2: Density by location (Source: West Berkshire Density Pattern Book, 2019) gives indicative densities of Rural AONB – 15dph; Edge of Village/Settlement AONB – 20dph. These give a development potential of between 16 and 22 dwellings depending on whether classed as rural or edge of village. It is most certainly not 'within village'.

Chieveley Parish Council has regard to many concerns raised about development in this location because of existing traffic problems at the medical practice opposite and elsewhere in the village including near the shop and at the west end of Graces Lane. Access from East Lane to the High Street and to the Oxford Road also have poor sight lines.

Other issues associated with the site concern access to the proposed dwellings, footpaths, and access to a proposed burial ground. Further extension to the site is also unacceptable in landscape terms.

Concerns about development density and traffic specific to this allocation have been raised in several representations made on the December 2020 draft and to the Parish Council since January 2023.

Having regard to the traffic issues; limitations imposed by site accesses; other access requirements (e.g., burial ground and PROWS); the rural nature of the site; and the existing character of the East Lane, Chieveley Parish Council believes the upper limit of 'up to 15 dwellings to be delivered at a low density in keeping with the surrounding area' at RSA17(a) is justified and must be adhered to. We remain concerned that this will be eroded, and the explanatory text must remain on this point.

Access to the site and hedgerows

It is still not clear how satisfactory accesses to the site will be achieved onto East Lane even if '*accesses may need to serve more than one dwelling*'. It appears inevitable that multiple accesses with sight lines will remove large parts of the mature hedgerow with mature trees fronting East Lane. A better thought-out access arrangement should be prepared to ensure the site is deliverable and acceptable. Alternative access arrangements need proper assessment, including a possible single access point.

Wider Transport and Traffic Issues

In the Council's responses to previous representations contained in the Proposed Submission LPR 2022-2039 Consultation Statement (Dec 2022), WBC responds to wider transport concerns with: *The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.*

Chieveley Parish Council is aware of many concerns about the acceptability of existing traffic conditions in the village, particularly problems at the Surgery and on the High Street near the shop and at the west end of Graces Lane. Access from East Lane to the High Street and to the Oxford Road also have poor sight lines.

Public Rights of Way

With regard to item (c), we agree that a footway must be provided on East Lane with this development but it difficult to see how this can be provided '*fronting the site*' (RSA17 (c)) without removing the existing hedgerow fronting the site. More detail of footpath improvement on East Lane should be provided.

Secondly, we believe that PROW improvements are required with this scheme, on land with the same control, to provide the footpath to the recreation ground that was previously proposed for this site as shown on the attached plan.

(See - PS1459 Chieveley Parish Council - attachment)

Burial Ground

Chieveley Parish Council welcomes the confirmation by the Diocese of Oxford that it is willing to provide land for a burial ground: lpr1940 Diocese of Oxford (Mr David Mason - 1272813). This is a significant commitment from the Diocese and is relevant to this Local Plan and allocation RSA17 because (i) it is a unique opportunity to provide a community facility and meet a local need and (ii) the possibility of providing the burial ground in this location is entirely dependent on access from East Lane which should be planned within this allocation.

However, in the document 'Consultation Statement for the Proposed Submission West Berkshire Local Plan Review 2022-2039 December 2022 (the Consultation Statement)', West Berkshire Council suggests an entirely different concept for the burial ground scheme and its access to that supported within the community. At page 2747 and 2748 of the Consultation Statement, West Berkshire Council says that access would need to be from Oxford Road. In the opinion of Chieveley Parish Council, that's unjustified and unreasonable. If East Lane can service the medical practice, existing dwellings, and allocation RSA17, it seems illogical to suggest it cannot also service a small burial ground extension requiring very few traffic movements, which would be entirely out of peak hours of traffic movement.

The reason for this being the preferred site for a burial ground is that land in the area of RSA17 on this part of the Glebe Land is one of the few sites within easy walking distance of St Mary's Church, Chieveley.

To take access to this land from Oxford Road as proposed by WBC would be seemingly absurd, both in terms of access and movement and visual impact.

The Regulation 18 response lpr 1940 which is repeated in full in the Consultation Statement relates to RSA17 and is not conditional on access from Oxford Road.

	<p>Therefore, Chieveley Parish Council continues to object strongly to the allocation as conceived by West Berkshire Council, with access to a burial ground extension from Oxford Road. The access needs to be from East Lane and that needs to be incorporated in the RSA17 allocation.</p> <p><u>Social Housing</u></p> <p>At least 40% of the proposed dwellings must be affordable housing, including housing for key workers, in accordance with other policies in this plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Problems at the medical practice in particular; and elsewhere in the village near the shop, at the west end of Graces Lane. Access from Est Lane to the High Street and to the Oxford Road also have poor sight lines.</p> <p>b. Alternative access arrangements to the site must be evaluated to provide a satisfactory solution that is also acceptable in terms of biodiversity, PROWs and access to a new burial ground. A transport assessment should also consider the wider traffic and transport issues including existing traffic issues at the medical practice, on the High Street and Graces Lane, and visibility issues at the junctions of East Lane with the High Street and Oxford Road.</p> <p>c. What is currently stated about 'a footway fronting the site' appears likely to further impact the existing hedgerow. We do not believe this allocation can be justified or in accordance with the NPPF without some better understanding of how this will be achieved.</p> <p>j. At least 40% of the proposed dwellings must be affordable housing, including housing for key workers, in accordance with other policies in this plan.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>This is an important allocation for the community of Chieveley and the Parish Council should be able to make these points and explain why they are relevant to the Plan.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Compton Parish Council
Consultee Full Name	Compton Parish Council
Consultee Organisation	Compton Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS332
Chapter / Policy / Appendix Number	Policy RSA 18
Chapter / Policy / Appendix Title	Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)
Order	118
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 11:35:58
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	It is impossible to comment as the council is neither Legally Qualified nor an expert in LPR Legal Compliance
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	Yes

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The council disagrees with the definition of "Positively Prepared".</p> <p>Plans which are both complex and cross representational boundaries are inherently difficult to deliver and hence "Ineffective"</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Poor evidence of inclusion of NDPs or co-operation with local communities.</p>
<p>4. Proposed Changes</p>	<p>Paragraph 2 needs the following addition in order to ensure the Compton Neighbourhood Development Plan is taken into account with regards to development on this site:</p> <p>The site, as shown on the indicative map, is to be comprehensively redeveloped delivering a residential led mixed-use scheme with a mix of employment floorspace, green infrastructure and community uses in accordance with the adopted SPD, and, more recently, the adopted Compton Neighbourhood Development Plan (NDP) (adopted 2022).</p> <p>Point e needs the following addition, in order to remove potential ambiguity that may be used to limit necessary highway improvements on the High Street:</p> <p>e. The existing access from the High Street will form the main access to the development with potential for a minor access from Churn Road. The rural character of Churn Road and Hockham Road will be retained and highway improvements should therefore be limited on these two roads;</p> <p>Point g: Concerns were raised that the distance to walk to The Ilsleys Primary School from the Institute site is too significant for primary age children and should not, therefore, be included in this policy. CPC, therefore, requests removal of the final sentence "If feasible, access for residents to Compton Primary School and/or The Ilsleys Primary School should be provided;".</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Thames Water</p>
<p>Consultee Full Name</p>	<p>Thames Water</p>
<p>Consultee Organisation</p>	<p>Thames Water Utilities Ltd</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS1002
Chapter / Policy / Appendix Number	Policy RSA 18
Chapter / Policy / Appendix Title	Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)
Order	118
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

PFC Calc for proposed development advises Low to No Risk. Pipe Capacity Calc = 7.6 % based on connection to 150mm dia FW Sewer located in Churn Road. GM 14/02/2023

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	<p>No</p>

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1193
Chapter / Policy / Appendix Number	Policy RSA 18
Chapter / Policy / Appendix Title	Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)
Order	118
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? -	Yes

<p>Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>We note and support the proposed criterion: "An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>While we welcome reference to special architectural and historic interest of the Compton Conservation Area, the wording is currently ambiguous, with a lack of clarity about what "It" refers to, and we advise reference to "conserve and enhance", rather than "take into account" which is weaker than required by legislation.</p> <p>We encourage the preparation of a CA Appraisal as a priority to support effective decision- making and implementation of this policy. Meanwhile, we note the existing Supplementary Planning Document that provides guidance on redevelopment of this site, including (based on our limited review) content on the significance of the conservation area.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><u>The scheme</u> It will also <u>conserve and enhance</u> explain how the special architectural and historic interest of the Compton Conservation Area and <u>protect</u> its setting has been taken into account...</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1795
Chapter / Policy / Appendix Number	Policy RSA 18
Chapter / Policy / Appendix Title	Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)
Order	118
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	Yes

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Environment Agency
<p>Consultee Full Name</p>	Judith Montford
<p>Consultee Organisation</p>	Environment Agency
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1845
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 18
<p>Chapter / Policy / Appendix Title</p>	Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)

Order	118
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is partly Flood Zone 2+3 and there is a main river approx 20m from site. The site is on Source Protection Location on site. SPZ1, principal bedrock aquifer, secondary A superficial aquifer, historic landfill site to NW of site (Churn Road)</p> <p>Under point k (i.e., the list of requirements to manage flood risk on site) we request adding the following: iii) 'detailed computer modelling of the river Pang which runs to the south of the site will be required to</p>

	<p>inform development proposals, including the latest Climate Change Allowances.' (Note that the Environment Agency does not currently hold detailed modelling of the Pang in this location).</p> <p>Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.</p> <p>Compton STW is a high spiller, so this issue needs to be addressed before connecting more flows to the works. Additional flows will lead to an increased instance of storm overflows. Development will lead to a deterioration in Phosphorous so a new permit will be required to prevent this from happening. Mitigation of additional load will need to be secured before any development can proceed. This wastewater drainage constraints should be highlighted for this site and stated in the policy text for site RSA18.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Policy RSA 19 Land west of Spring Meadows, Great Shefford (Site Ref: GS1)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Farrant, Caroline
Consultee Full Name	Caroline Farrant
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS12
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	22/02/2023 20:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	The plan in no way takes in consideration what current residents want or need in their locality. Evidence of potential flooding has been found, but because the flooding isn't on the actual sites it's ignored, impact on surrounding housing hasn't been considered
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	I don't think the plans for great shefford have considered the impact on spring meadows fully, there are sections with footpath and no surplus road width to allow them, the roads are barely two car width wide. It hasn't it been considered that the parking is already difficult and there will be at least 30 more cars travelling through the street. 15 houses is too many. Flooding is a major issue In the village the plan identifies that the planned area is at risk of flooding, but it doesn't appear that the current housing flooding risk has been assessed, it's also been identified that there will be too much pressure on the sewage works in east shefford.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Knass, Gareth
<p>Consultee Full Name</p>	Gareth Knass
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS56
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 19
<p>Chapter / Policy / Appendix Title</p>	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
<p>Order</p>	120
<p>Submission Type</p>	Web

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	14/02/2023 15:29:06
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	<p>Policy RSA 19 (Site Ref: GS1): Development of the proposed allocation site would be contrary to the provisions of the Habitat Regulations 2017 (as amended) as it would provide an adverse effect on the integrity of the River Lambourn SAC through the cumulative impact of sewage pollution. The site will require connection to the existing sewage network, which is failing and has been subject to substantial work from Thames Water in the last 15 years and this work has been documented through the Lambourn Valley Flood Forum.</p> <p>The system cannot cope with existing use during periods of high ground water and is surcharging into the riverine environment. Thames Water has been trying to line the system to stop ingress of ground water, but this is not a sealed system. This proposal would add to the significant adverse impact on the River Lambourn SAC. The proposal to upgrade the East Shefford Sewage Treatment Works and the new flood alleviation scheme will not resolve the specific issue of ground water infiltration, and therefore capacity and pollution in the foul network. The ongoing mitigation works has been considered at recent Lambourn Valley Flood Forum meetings. Continuing impacts of the failing sewage network on the valley and the River Lambourn SAC are likely to be made worse by development here. This applies even with phasing considered in the draft policy. This policy should be thoroughly reviewed by relevant parties and through a Habitat Regulations Assessment of the Local Plan. The mitigation will not be deliverable in a system that has such ground water issues and therefore the plan will fail the integrity tests of the Habitat Regulations and will have to consider over-riding public interest and alternatives. It should fail both these tests given the parameters of the allocation.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	<p>The draft Policy RSA 19 (Site Ref: GS1) has not had regard to significant local concerns. Pollution and flooding are discussed above in relation to the River Lambourn SAC, but also affect the village - people at the lower end of the village have sewage surcharging into their gardens during high infiltration periods. The allocation will add to this for the reasons outlined above with regard to the River Lambourn.</p> <p>Surface water issues are mentioned and that certain areas of the site should be avoided in relation to development. The village suffered significantly in the flash floods of 2007 (see also the Council's own report from 2007). The proposed allocation site is c2m above the existing dwellings in the village. Altering the landform in this location will exacerbate potential for future flash floods to existing residents. Relying on a developer's surface water strategy is not appropriate given the hydrology and topography of the site, and surrounding sensitive receptors. The Council needs to fully address this at this stage if they are going to forward this allocation. Infiltration or storage in underground containers is not appropriate in areas of high groundwater.</p> <p>The proposal does not address adequately the potential landscape and visual impacts. It is left to a future LVIA. This needs to be addressed now at this stage as it is likely to have a significant impact on the AONB. The site is 2m higher than elsewhere in the village, can be seen from the surrounds, and unless it can commit to no street lighting will further impact on the dark sky environment.</p> <p>The site is not sustainable, and wording to the effect of encouraging non-car modes of transport is not appropriate in a village that has very limited public transport, which is being reduced rather than encouraged, and with limited other services. The existing housing estate has insufficient parking, which will be cut down to a number of existing residents, by provision of a new footway at the end of Spring Meadows. Where are existing residents going to park? The Spring Meadows development was also at a time of Council policy to 'encourage non-car transport modes', the result is that the housing has insufficient off-road parking and people struggle to park on the narrow road.</p> <p>The draft allocation refers to ecology and protection of boundary vegetation. The landowner has removed woody vegetation over the years, with scrub loss around the school boundary. They have recently unilaterally taken to add a new site entrance to Spring Meadows, which was objected to through the Council's enforcement team. This may have had adverse impacts on site ecology, please refer to my comments on this from 2022.</p> <p>There is no reference to safeguarding of the sensitivities of the school boundary. There is no consideration of construction and additional traffic on a narrow road where the school pick up occurs.</p> <p>This allocation has many negative impacts on the village, and they are not outweighed by the positive ones, it should therefore be removed.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Remove Policy RSA 19 (Site Ref: GS1)
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Harris, Joe
Consultee Full Name	Joe Harris
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS367
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	25/02/2023 09:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to express my concern, and objections for the proposed development extending beyond Spring Meadows (RSA19 Site Ref: GS1), Great Shefford, RG177EN.</p> <p>I fail to see the proposed site suitable because of the following:</p> <ol style="list-style-type: none"> 1 Access via a small heavily congested residential road. Local residence of Spring Meadows and those who use the road to drop off and collect their children who attend the local primary school, have to park on Spring Meadows and adjoining roads due to limitations in residential parking spaces allocated to each of the properties on the road. 2 With a history of flooding in the very nearby area, the access can be isolated due to flooding (which it has been multiple times in the recent past). 3 The proposed location is on the foot of a hill side which is victim to a rain run off, and will impact the ground absorbing capabilities. Leading to long term problems, and increasing future flood risks. 4 The proposed site is on higher ground than existing immediate neighbouring houses and will be a violation of privacy, with potential new houses looking straight into existing gardens and bedroom windows. 5 Great Shefford boasts the finest natural wild life I've ever witnessed, the wild bird life is possibly the most varied I've ever known, and we are so fortunate to have many different species of bats all over this particular area. 6 Whilst the development would be taking place, safety would also be a huge concern as there is currently not suitable parking on Spring Meadows and with large construction traffic the local housing would be more challenging to access for emergency services, (there is regularly ambulances assisting vulnerable residents). Is there an option to look into other temporary access options for construction vehicles and machinery? Such as a new road or temporary road through the adjoining fields that are currently owned by the same landowner? As this would dramatically ease concerns, risks, and stress for the residents <Personal details removed> living right on the boundary of the proposed development.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Governing board of Chaddleworth St Andrews and Shefford C of E Primary Schools</p>
<p>Consultee Full Name</p>	<p>James Hazlewood</p>
<p>Consultee Organisation</p>	<p>Governing board of Chaddleworth St Andrews and Shefford C of E Primary Schools</p>
<p>Agent Full Name</p>	

Agent Organisation	
Comment ID	PS550
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 19:57:10
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The governing board would like to highlight 3 areas of concern which would have to be addressed in order to make any development on the site acceptable:

	<p>Safeguarding - The south west boundary is immediately adjacent to the school playing fields, and so boundary treatment should be considered to ensure the safeguarding of children on the site.</p> <p>Vehicle access and pedestrian safety - Any development on the site will need to consider and mitigate the impact of the additional vehicle movements on Spring Meadows, particularly during school drop off and collection.</p> <p>Infrastructure funding - Any development on the site should provide a suitable contribution under CIL or Section 106 towards school infrastructure to mitigate the impact of additional families with school-aged children moving into the new homes.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bell, Alex
Consultee Full Name	Alex Bell
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1021
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	04/03/2023 09:58:00
Attached Files	PS1021 Alex Bell Attachment 1.png PS1021 Alex Bell Attachment 2.png

<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>On the previous plan, it was not recommended for allocation. What is different this time around?</p> <p>There is large ground water, even now the garden is saturated from the recent rains.</p> <p>The land that is being suggested for allocation of 15 houses is raised and much higher than that of the houses that border it by some few good metres.</p> <p>This will cause huge oversight and privacy issues, as well as all the houses that lie on the boundary an unattractive outlook.</p> <p>Privacy is lost, as well as garden views. No one wants a house looking down on another house.</p> <p>The suggested access via Spring Meadows is also of concern. 15 houses average of 30 additional cars using the road as access, that already has cars parked on the road and is school access.</p> <p>This should be re-addressed. Not to mention the change in land level, which I repeat is multiple metres from current Spring meadows to the land that is being allocated.</p>

The landscape regardless of any planted boundaries will be affected, as these dwellings will sit so high in the skyline and the lie of the land in comparison to the rest of Spring Meadows.

Flood alleviation works are proposed for the village, but when and what effect this will have is not yet determined. Many flood alleviations schemes have been put in that do not have the desired effect.

Ground water run-off from the chalk hills, in this area of settlement on Spring Meadows will undoubtedly be affected by further housing on the land being allocated.
Much consideration and investigation need to be put into this.

Will the land be excavated to bring it down to the level of the other houses? If not, surely house cannot be built literally 'on top' of other houses, to look down into the gardens.
Their ground floor will be level with the top floor or above of the existing houses that lie on the boundary.

Things to note and things that will certainly need addressing:

- 1 Ground Level
- 2 Ground Water
- 3 Water Run Off
- 4 Existing dwellings privacy
- 5 Existing road use
- 6 Effect of the proposed dwellings on the flooding on Wantage Road (further hard standing and water run off downhill to the Wantage Road)

I refer you back to the previous Local Plan, with all the comments made by residents and professionals, and that the previous Local Plan did not approve for allocation.

It is not understood how this can change in 5 years to now make this site viable for development. This email is to object to the decision that the site is recommended for allocation as per the Local Plan to 2039.

To make reference to my statement please see here: Page 51, and I highlight here in a snippet. It must be explained how this has changed since May 2017:
See attachment: PS1021 Alex Bell Attachment 1

Also, please see here previous comments and reasons for the site NOT being allocated, how has this changed?
http://decisionmaking.westberks.gov.uk/documents/s43709/4f.%20Appendix%20F%20SA_SEA%20Report.pdf
See attachment: PS1021 Alex Bell Attachment 2

Also, in same document I refer to pages 1348 to 1356 inclusive. And again,, the result shows:
See attachment: PS1021 Alex Bell attachment 3

I have seen no justification for why this reasoning has changed. This 2nd email is further to show my objection to the site being suitable for 15 dwellings.

Previously, it should be noted that Great Shefford Parish Council agrees that the area of land at RSA 28 which is shown edged red on the inset plan for this site should not be developed.
Please review Great Shefford Parish Council
(lpr1855), Consultation_Statement_-_Proposed_Submission_LPR_Dec_2022_v2.pdf (westberks.gov.uk)

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Changes sought: Removal of site RSA 28 from the Local Plan</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Spring Meadows Action Group
Consultee Full Name	Spring Meadows Action Group
Consultee Organisation	Spring Meadows Action Group
Agent Full Name	Susan Maugey
Agent Organisation	
Comment ID	PS914
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:44:00
Attached Files	Spring Meadows Action Group cover letter.docx
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	I have no reason to believe otherwise
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	[For accompanying representations see attached Spring Meadows Action Group cover letter] The sustainability of Site GS1, given the provisos under draft policy RSA 19 is questioned for the reasons set out in the accompanying representations.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	I have no reason to believe otherwise
4. Proposed Changes	My representations solely relate to Site GS1
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	

Comment ID	PS1003
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Waste Response

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1846
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	

<p>alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on principal bedrock aquifer and secondary aquifer</p> <p>Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. East Shefford STW has a 0.1mg/l stretch target for P. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. We would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. As with Newbury or any site with stretch targets for Phosphorous, any additional loading may impact their ability to meet the environment act objectives.</p> <p>As stated in our suggested amendments and notes on Policy DM7, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA19.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1796
Chapter / Policy / Appendix Number	Policy RSA 19
Chapter / Policy / Appendix Title	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)
Order	120
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hermitage Neighbourhood Plan Steering Group
Consultee Full Name	Rosie Healy
Consultee Organisation	Hermitage Neighbourhood Plan Steering Group
Agent Full Name	
Agent Organisation	
Comment ID	PS223
Chapter / Policy / Appendix Number	Policy RSA 20
Chapter / Policy / Appendix Title	Land off Charlotte Close, Hermitage (Site Ref: HSA 24)
Order	122
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 08:52:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Hermitage Neighbourhood Plan Group wishes to OBJECT to the proposed Submission Version of the West Berkshire Local Plan Review (WBLPR). In respect of the strategy and site allocations for Hermitage, the plan is not sound for the following reasons:</p> <ol style="list-style-type: none"> 1 It is not justified because it has not been based on proportionate evidence. 2 It is not consistent with national policy because it does not demonstrate that it will enable the delivery of sustainable development. <p>The WBLPR proposes the allocation of three sites:</p> <ol style="list-style-type: none"> 1 1 RSA20 – Land off Charlotte Close – for approximately 15 dwellings 2 RSA21 – Land to the south east of the Old Farmhouse – for approximately 10 dwellings 3 RSA22 – Land adjacent to Station Road – for approximately 34 dwellings. <p>These three sites are intended to deliver approximately 59 dwellings over the plan period. The Regulation 18 version of the WBLPR required approximately 45 dwellings for Hermitage, therefore the proposed submission version represents an uplift in the requirement of 14 dwellings. Moreover, sites RSA20 and RSA21 both now have planning permission for a total of 12 dwellings more than the figure in the WBLPR (an additional 1 dwelling on RSA20 and 11 more dwellings on RSA21). So, at Regulation 18 stage, Hermitage was required to deliver approximately 45 dwellings and now, taking into account site allocations that have already entered the planning pipeline, that figure has risen to 76 dwellings. The Hermitage Neighbourhood Plan Steering Group is not aware of any evidence that has been submitted to assess the cumulative impact of this additional development on the village.</p> <p>Whilst this level of growth may be lower in absolute terms than many other settlements, Hermitage sits in a very sensitive location, being within the North Wessex Downs AONB. The overall scale of growth proposed for the settlements in this area is substantially lower than either the Eastern Area or Newbury and Thatcham, which reflects this sensitivity. However, it appears that in the case of Hermitage at least, the strategy of limiting growth in this part of the district is not being properly observed by a combination of the scales of growth proposed on WBLPR site allocations and development management decision-making on individual planning applications in respect of two of these site allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1004
Chapter / Policy / Appendix Number	Policy RSA 20
Chapter / Policy / Appendix Title	Land off Charlotte Close, Hermitage (Site Ref: HSA 24)
Order	122
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	No

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1797
Chapter / Policy / Appendix Number	Policy RSA 20
Chapter / Policy / Appendix Title	Land off Charlotte Close, Hermitage (Site Ref: HSA 24)
Order	122
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.</p> <p>We are not entirely clear what is being referenced in the Sustainability Appraisal when it refers to heritage benefits. We advise making these clearer in the Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1847
Chapter / Policy / Appendix Number	Policy RSA 20
Chapter / Policy / Appendix Title	Land off Charlotte Close, Hermitage (Site Ref: HSA 24)
Order	122
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A bedrock aquifer and secondary aquifer</p> <p>We encourage the requirement for the development scheme to include opportunities to open up the culvert and contribute to biodiversity net gain</p> <p>Developments connecting to Chieveley STW may be problematic as it discharges into The River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. Mitigation of additional load will need to be secured before any development can proceed.</p> <p>As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA20.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA20.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Policy RSA 21 Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hermitage Neighbourhood Plan Steering Group
Consultee Full Name	Rosie Healy
Consultee Organisation	Hermitage Neighbourhood Plan Steering Group
Agent Full Name	
Agent Organisation	
Comment ID	PS224
Chapter / Policy / Appendix Number	Policy RSA 21
Chapter / Policy / Appendix Title	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
Order	124
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 08:52:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Hermitage Neighbourhood Plan Group wishes to OBJECT to the proposed Submission Version of the West Berkshire Local Plan Review (WBLPR). In respect of the strategy and site allocations for Hermitage, the plan is not sound for the following reasons:</p> <ol style="list-style-type: none"> 1 It is not justified because it has not been based on proportionate evidence. 2 It is not consistent with national policy because it does not demonstrate that it will enable the delivery of sustainable development. <p>The WBLPR proposes the allocation of three sites:</p> <ol style="list-style-type: none"> 1 1 RSA20 – Land off Charlotte Close – for approximately 15 dwellings 2 RSA21 – Land to the south east of the Old Farmhouse – for approximately 10 dwellings 3 RSA22 – Land adjacent to Station Road – for approximately 34 dwellings. <p>These three sites are intended to deliver approximately 59 dwellings over the plan period. The Regulation 18 version of the WBLPR required approximately 45 dwellings for Hermitage, therefore the proposed submission version represents an uplift in the requirement of 14 dwellings. Moreover, sites RSA20 and RSA21 both now have planning permission for a total of 12 dwellings more than the figure in the WBLPR (an additional 1 dwelling on RSA20 and 11 more dwellings on RSA21). So, at Regulation 18 stage, Hermitage was required to deliver approximately 45 dwellings and now, taking into account site allocations that have already entered the planning pipeline, that figure has risen to 76 dwellings. The Hermitage Neighbourhood Plan Steering Group is not aware of any evidence that has been submitted to assess the cumulative impact of this additional development on the village.</p> <p>Whilst this level of growth may be lower in absolute terms than many other settlements, Hermitage sits in a very sensitive location, being within the North Wessex Downs AONB. The overall scale of growth proposed for the settlements in this area is substantially lower than either the Eastern Area or Newbury and Thatcham, which reflects this sensitivity. However, it appears that in the case of Hermitage at least, the strategy of limiting growth in this part of the district is not being properly observed by a combination of the scales of growth proposed on WBLPR site allocations and development management decision-making on individual planning applications in respect of two of these site allocations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1168
Chapter / Policy / Appendix Number	Policy RSA 21
Chapter / Policy / Appendix Title	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
Order	124
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:00:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	In respect of the allocation of this site only. We have made concerns on behalf of the same client in respect of the spatial strategy, housing requirement and housing delivery. Our support for the continued allocation of this site does not reflect support for the plan as a whole.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Our client owns land in the District that has been allocated for development in the draft Local Plan. This relates to Land to the South East of the Old Farmhouse, Hermitage, which is proposed for allocation in Policy RSA21 for approximately 10 dwellings. This carries forward the allocation of the site for development from the adopted Housing Site Allocations Development Plan Document (DPD) (May 2017), as set out in Policy HSA25.</p> <p>Our client supports the proposed allocation of the site and is keen to continue working collaboratively with the Council to secure its sustainable development pursuant to the Outline Planning Permission for 21 dwellings which has already been achieved.</p> <p>As outlined above, Policy RSA21 of the draft Local Plan allocates land owned by our client to the South East of the Old Farmhouse, Hermitage, for approximately 10 dwellings. This carries forward the allocation of the site for development from the adopted Housing Site Allocations Development Plan Document (DPD) (May 2017), as set out in Policy HSA25.</p> <p>The site's recent planning history is summarised below.</p> <p>Outline planning permission was granted on 20 November 2018 (ref. 17/03290/OUTMAJ) for the following development: "Outline application for demolition of farmyard buildings, retention of The Old Farmhouse and the erection of up to 21 new dwellings, improved vehicular access off Newbury Road, car parking, public open space and landscaping. Matters to be considered – Access"</p> <p>On 15 July 2020, the Council refused an application under Section 73 of the Town and Country Planning Act 1990 (as amended) "to vary Condition 4 (approved plans) of previously approved application 17/03290/OUTMAJ to amend the parameter plan" (ref. 19/02993/OUTMAJ). A subsequent appeal was allowed under ref: APP/W03040/W/20/3258901.</p> <p>The reserved matters application is currently pending consideration (ref. 21/02923/RESMAJ).</p> <p>Our client is pleased to note some amendments made to the policy in relation to our representations on the Regulation 18 version of the draft Local Plan; we therefore support this policy.</p> <p>We would however suggest that the Policy wording be updated to reflect that the site does benefit from an implementable Planning Permission for 21 dwellings. This includes land within the existing Settlement as well as that covered by RSA21. It would we feel be more transparent to refer to this extant permission.</p> <p>Conclusion</p> <p>These representations have been prepared by Pro Vision on behalf of our client T A Fisher & Sons in response to West Berkshire Council's consultation on its Local Plan Review 2022-2039: Proposed submission.</p> <p>Our client owns land in the District that has been allocated for development in the draft Local Plan. This relates to Land to the south east of the Old Farmhouse, Hermitage, which is proposed for allocation in Policy RSA21 for approximately 10 dwellings. This carries forward the allocation of the site for development from the adopted Housing Site Allocations Development Plan Document (DPD) (May 2017), as set out in Policy HSA25.</p> <p>Our client supports the proposed allocation of the site and is keen to continue working collaboratively with the Council to secure its sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	<p>Yes</p>

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1005
Chapter / Policy / Appendix Number	Policy RSA 21
Chapter / Policy / Appendix Title	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
Order	124
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p>

	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1175
Chapter / Policy / Appendix Number	Policy RSA 21
Chapter / Policy / Appendix Title	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
Order	124
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	The allocation for RSA21 does not mention Barnaby Thatch (GII) to the north. Proposals need to take account of this designated heritage asset and ensure that they avoid or minimise harm to its significance.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	We advise adding the following criterion to the policy: <u>Protect the setting of the nearby Listed Building (Barnaby Thatch)</u>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1848
Chapter / Policy / Appendix Number	Policy RSA 21
Chapter / Policy / Appendix Title	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
Order	124
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A bedrock aquifer and secondary aquifer</p> <p>We encourage the requirement for the development scheme to include opportunities to open up the culvert and contribute to biodiversity net gain</p> <p>Developments connecting to Chieveley STW may be problematic as it discharges into The River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. Mitigation of additional load will need to be secured before any development can proceed.</p> <p>As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA21.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA20.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1798
Chapter / Policy / Appendix Number	Policy RSA 21
Chapter / Policy / Appendix Title	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
Order	124
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	Yes

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.</p> <p>We are not entirely clear what is being referenced in the Sustainability Appraisal when it refers to heritage benefits. We advise making these clearer in the Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy RSA 22 Land adjacent Station Road, Hermitage

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hermitage Neighbourhood Plan Steering Group
Consultee Full Name	Rosie Healy
Consultee Organisation	Hermitage Neighbourhood Plan Steering Group
Agent Full Name	
Agent Organisation	
Comment ID	PS225
Chapter / Policy / Appendix Number	Policy RSA 22
Chapter / Policy / Appendix Title	Land adjacent Station Road, Hermitage
Order	126
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	23/02/2023 08:52:00
Attached Files	Hermitage NDP attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Hermitage Neighbourhood Plan Group wishes to OBJECT to the proposed Submission Version of the West Berkshire Local Plan Review (WBLPR). In respect of the strategy and site allocations for Hermitage, the plan is not sound for the following reasons:</p> <ol style="list-style-type: none"> 1 It is not justified because it has not been based on proportionate evidence. 2 It is not consistent with national policy because it does not demonstrate that it will enable the delivery of sustainable development. <p>The WBLPR proposes the allocation of three sites:</p> <ol style="list-style-type: none"> 1 1 RSA20 – Land off Charlotte Close – for approximately 15 dwellings 2 RSA21 – Land to the south east of the Old Farmhouse – for approximately 10 dwellings 3 RSA22 – Land adjacent to Station Road – for approximately 34 dwellings. <p>These three sites are intended to deliver approximately 59 dwellings over the plan period. The Regulation 18 version of the WBLPR required approximately 45 dwellings for Hermitage, therefore the proposed submission version represents an uplift in the requirement of 14 dwellings. Moreover, sites RSA20 and RSA21 both now have planning permission for a total of 12 dwellings more than the figure in the WBLPR (an additional 1 dwelling on RSA20 and 11 more dwellings on RSA21). So, at Regulation 18 stage, Hermitage was required to deliver approximately 45 dwellings and now, taking into account site allocations that have already entered the planning pipeline, that figure has risen to 76 dwellings. The Hermitage Neighbourhood Plan Steering Group is not aware of any evidence that has been submitted to assess the cumulative impact of this additional development on the village.</p> <p>Whilst this level of growth may be lower in absolute terms than many other settlements, Hermitage sits in a very sensitive location, being within the North Wessex Downs AONB. The overall scale of growth proposed for the settlements in this area is substantially lower than either the Eastern Area or Newbury and Thatcham, which reflects this sensitivity. However, it appears that in the case of Hermitage at least, the strategy of limiting growth in this part of the district is not being properly observed by a combination of the scales of growth proposed on WBLPR site allocations and development management decision-making on individual planning applications in respect of two of these site allocations.</p> <p>The main difference between the Regulation 18 and Submission Versions of the WBLPR is the allocation of RSA22 – land adjacent to Station Road – for 34 dwellings. Whilst the Hermitage Neighbourhood Plan Group does not object to the principle of allocating this site, it has significant concerns that the evidence gathered through the Housing and Economic Land Availability Assessment (HELAA) process has not been used to inform Policy RSA22.</p> <p>Under the assessment of suitability (Stage 2b), the HELAA cites the Landscape Sensitivity and Capacity Assessment 2022. This concludes that development across the whole site would have a significant impact on key landscape characteristic and valued features of this area of the AONB and would not be appropriate. It goes on to say that development across part of the site could be considered further, subject to the retention of boundary vegetation and the careful consideration of a central open area which could have the character of a village green. It clearly recommends that development should be contained as indicated in the map below: <for map see attachment></p> <p>The map shows a significantly reduced area suitable for development than is shown in the WBLPR for RSA22. The purpose of this reduced area for development is to prevent the otherwise unacceptable landscape impact of development. The Assessment – supported by the map - goes on to say that development would be subject to the following requirements:</p> <ol style="list-style-type: none"> 1 Set back from the existing regenerated treed railway line, with additional tree planting along this boundary to further reduce the visual effect of the development on the landscape to the south 2 Set back from Station Road to retain the rural character and the setting of the mature roadside trees. <p>Whilst the wording of Policy RSA22 states that development will be in accordance with the Landscape Sensitivity and Capacity Assessment 2022 and specifically identifies these requirements, the indicative plan supporting Policy RSA22 does not provide the appropriate guidance, suggesting that development could come close to the boundaries with the railway line and Station Road. In order for Policy RSA22 to be effective, it is necessary that the indicative plan is amended to be consistent with the plan shown in the Landscape Sensitivity and Capacity Assessment 2022 (and in these representations). This will make clear the extent of landscape buffers required to ensure the landscape impact is acceptable.</p> <p>In this regard, the location of the site within the North Wessex AONB must be recognised. Paragraph 174 of the NPPF requires that planning policies contribute to and enhance the natural and local environment by 'protecting and enhancing valued landscapes'. Moreover, paragraph 176 states that 'great weight should be given to conserving and enhancing landscape and scenic beauty' in the AONB. Furthermore it states that, 'the scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.' The proposed Policy RSA22 does not provide the necessary clarity to ensure development achieves this, therefore it is not consistent with national policy.</p> <p>A further reason that the Hermitage Neighbourhood Plan Steering Group is particularly concerned that Policy RSA22 and the accompanying indicative plan is clear and unambiguous is because no evidence has been submitted by the site promoter to demonstrate that the site is viable based on an allocation of</p>

	<p>approximately 34 dwellings. Policy RSA22 rightly requires a significant level of secondary works in order to ensure that development reflects the sensitive landscape setting in which the site sits. If the developer is unable to deliver a scheme for approximately 34 dwellings and instead requires a scale of development that is significantly in excess of this to ensure development is brought forward, then the site should not be allocated. In considering sites for allocation, it must be demonstrated that they are available, suitable and achievable. Planning Practice Guidance states, 'A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.' (Paragraph: 020 Reference ID: 3-020-20190722). Without evidence of the scale of development proposed in the policy being viable, Policy RSA22 is unsound because it has not been justified.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hermitage Parish Council
<p>Consultee Full Name</p>	Nicky Pierce
<p>Consultee Organisation</p>	Hermitage Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS383
<p>Chapter / Policy / Appendix Number</p>	Policy RSA 22
<p>Chapter / Policy / Appendix Title</p>	Land adjacent Station Road, Hermitage
<p>Order</p>	126
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	27/02/2023 10:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>We have reviewed the document and find it to be generally of a high standard; however, we have some significant concerns regarding the proposals in relation to the Hermitage parish.</p> <p>You will have received a response from the Hermitage Neighbourhood Development Plan Steering Group. HPC strongly supports all the points in that response regarding RSA22 Land Adjacent to Station Rd Hermitage, so will not repeat them for brevity. Other aspects of RSA22 that we strongly object to are:</p> <ul style="list-style-type: none"> • The lack of parking provision for Holy Trinity Church. Parking additional to the residential requirements should be provided for this venue to reduce the risks associated with parking on Marlston Road and Lipscombe Close. This would need pedestrian access; we would hope that would be part a cycle route from that Marlston to Station Road to reduce cycle traffic on the B4009. • Lack of landscaping behind the rear gardens off Lipscombe Close. Planting is needed to ensure the privacy of existing residents and provide a soft feel to the area consistent with the general village ambience and the proposed Neighbourhood Development Plan.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1006
Chapter / Policy / Appendix Number	Policy RSA 22
Chapter / Policy / Appendix Title	Land adjacent Station Road, Hermitage
Order	126
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p>

	<p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>White, Mr P & Baker, Mr F (Represented by Wey Planning)</p>
<p>Consultee Full Name</p>	<p>Mr F Baker and Mr P White</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	<p>Mr Lance Flannigan</p>

Agent Organisation	Wey Planning
Comment ID	PS406
Chapter / Policy / Appendix Number	Policy RSA 22
Chapter / Policy / Appendix Title	Land adjacent Station Road, Hermitage
Order	126
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 09:36:00
Attached Files	PS406 Wey Planning Appendix 1 - Land ownership.pdf PS406 Wey P Appendix 2 Approved Parameters Plan 19_02993_OUTMAJ.pdf PS406 Wey Planning Appendix 4 HM Land Registry Form TP1.pdf PS406 Wey Planning Appendix 5 Indicative Map Policy RSA22.pdf PS406 Wey P Appendix 6 Proposed Indicative Map for Policy RSA22.pdf PS406 Wey P Appendix 7 Hermitage Housing Needs Survey exec summ.pdf PS406 Wey P Appendix 9 Site Analysis Plan.pdf PS406 Wey Planning Appendix 3 Landscape Strategy Plan.pdf PS406 Wey P Appendix 8 DEFRA Risk of surface water flooding.pdf PS406 Wey P Appendix 10 Illustrative Masterplan.pdf PS406 Wey P Appendix 11 Viewpoint assessment.pdf PS406 Wey Planning Appendix 4 HM Land Registry REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? -	No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

1.1 This representation is made on behalf of Mr F Baker and Mr P White, the joint owners of Land adjacent to Station Road, Hermitage ("the site"), the extent of which is shown on the Land Ownership and Availability Plan at Appendix 1.

1.2 It follows previous submissions and representations to earlier stages of the West Berkshire Local Plan Review 2022-2039 ("LPR") preparation made on behalf of the Executors to the Neville Baker Estate, since when the estate has been settled and the land transferred to the current joint owners.

1 General

2.1 We confirm our support in principle for the allocation of the site for new housing development under Policy RSA22.

2.2 In general terms, we consider the allocation meets the tests of soundness set out in Paragraph 35 of the NPPF, to be applied in a proportionate way to non-strategic policies, taking account of whether they are consistent with strategic policies SP1 to SP24 of the LPR (NPPF Para 36).

2.3 We note that the allocation is the result of detailed site assessment and selection by the Council, as set out in the West Berkshire HELAA (January 2023) ("HELAA") and other LPR evidence base documents, which establish that the site is deliverable in part i.e. within years 6-10 of the LPR (NPPF Para 68).

2.4 Specifically in relation to site suitability, the land is situated within the North Wessex Downs Area of Outstanding Natural Beauty ("the AONB"), where Paragraph 176 of the NPPF requires great weight to be given to conserving and enhancing landscape and scenic beauty. This weight is reflected in Policy SP2 of the LPR, which states that the North Wessex Downs AONB spatial area "will have appropriate and sustainable growth that conserves and enhances its special landscape qualities". Accordingly, to be consistent with national and LPR strategic policy, it is essential in our view that allocated sites in the AONB have been subjected to robust assessment of the capacity of the site and local landscape to accommodate development in a manner which conserves and enhances its special qualities.

2.5 Such an assessment has been undertaken by the Council in the form of its Landscape Sensitivity and Capacity Assessment for: HER4 – Land north of Station Road, Hermitage (May 2022) ("LSCA") which concludes that, subject to a number of requirements, part of the site has the capacity to accommodate development in a manner which conserves and enhances the special landscape qualities of the AONB. We agree with that conclusion in broad terms, since it is consistent with the findings of our own Landscape Capacity Assessment (December 2020) which was submitted to the Council and, on that basis, we believe that the suitability of the site in landscape terms has been established based on robust evidence.

2.6 However, we believe that read in conjunction, the text of Policy RSA22 and the Indicative Map do not represent the best and most appropriate strategy for achieving sustainable development in accordance with the policies of the NPPF, based on proportionate evidence. We also consider that there is a reasonable alternative strategy which, whilst complying with the written requirements of the LSCA and Policy RSA22 aimed at conserving and enhancing the AONB (save for the requirement to contain development as indicated in Figure 2 of the LSCA), will make more effective use of the site in a way which is more successful in achieving social and other environmental objectives; specifically in relation to flood risk, public open space and recreational opportunities, and optimising the use of the site for housing.

1 Other Matters

3.1 In addition to the substantive policy matters raised in relation to Policy RSA22, we take this opportunity to draw attention to two other matters which we feel it is appropriate to raise at Regulation 19 Stage, so that they can be addressed and resolved before the LPR proceeds to formal adoption.

1 a) The northern boundary of the Policy RSA22 site

3.2 The northern boundary of the site as shown on the Indicative Map is incorrect and needs to be amended. Since the northern boundary forms the south eastern boundary of the RSA21 site, this also needs to be changed.

3.3 The reason for this is because Condition 4 of outline planning permission 19/02993/OUTMAJ for the development of up to 21 dwellings on the Old Farmhouse Site (which includes the RSA 21 site) requires the development to be carried out in accordance with the approved Parameters Plan (Appendix 2 to these representations), which shows that the landscape buffer running along the south eastern boundary extends beyond the application site boundary (and the boundary shown on the RSA21 Indicative Map) to include land within the RSA22 site as shown on the RSA22 Indicative Map. The reserved matters application 21/02923/RESMAJ submitted pursuant to the outline permission shows the same arrangement (Appendix 3).

3.4 In terms of land ownership, the Executors sold most of the Old Farmhouse/RSA21 site to the developer TA Fisher & Sons in 2019, but ownership of part of the RSA21 site adjacent to Lipscomb Close was retained for future access to the RSA22 site in exchange for the right to plant the landscape buffer on the retained land (refer to the HM Land Registry Form TP1 at Appendix 4 for details).

3.5 For these reasons, the land to be used as a landscape buffer to screen the RSA21 site is not available for development of the RSA22 site (except for access, over part) as required by Paragraph 68 of the NPPF. The correct boundary between the two sites is shown by the red line on the Land Ownership and Availability Plan at Appendix 1 and so the Indicative Maps for Policies RSA21 and RSA22 need to be changed accordingly.

3.6 The rest of these representations assume that the change to the northern boundary of the RSA22 site will be made.

1 b) Soundness of the Policy RSA22 Indicative Map

3.7 Even if no other changes to the Policy RSA22 Indicative Map are made as a result of these representations, there are major ambiguities between the parameters set out in parts b. and d. of Policy RSA22 and the Indicative Map. Specifically in relation to part d., these parameters have been taken “verbatim” from the LSCA and we assume it is essential from the Council’s point of view that they are met in full so that the special landscape qualities of the AONB are conserved and enhanced. Furthermore, they all have a spatial dimension and clearly form part of the development to which Policy RSA22 relates. Therefore, they should all be clearly defined on the Indicative Map to confirm their location and extent and included in the gross site area (as shown by the red line site boundary) of the RSA22 site.

3.8 As currently drawn, only the location and extent of the open space to the north of the site and the developable area are identified and included within the red line site boundary/gross site area shown on the Indicative Map. In relation to the Policy RSA22 parameters for development to;

- take opportunities to make walking and cycling links part of a Hermitage to Newbury off road path (part b.);
- be set back from the existing treed railway line with additional planting along this boundary (part d. i.); and
- be set back from Station Road to retain the rural character and the setting of the mature roadside trees (part d. iv.)

none of these parameters are defined on the Indicative Map and the land to which parts b. and d. i. aren’t included in the red line boundary/gross site area at all.

3.9 Whilst we do not agree with the way these parameters (“requirements”) are indicated in Figure 2 of the LSCA, at least they are all defined in Figure 2 in terms of their location and extent and are all included in the red line site boundary/gross site area. Therefore, whilst the text of Policy RSA22 repeats the written requirements of the LSCA verbatim, the “selective” approach adopted by the Council to the inclusion or exclusion of these parameters on the Indicative Map is inexplicable.

3.10 Based on these ambiguities and omissions from the Indicative Map, it will not be possible for a decision maker, an applicant or the general public to establish with any certainty what area of land Policy RSA22 applies to as a whole; or the location and extent of the land to which individual policy parameters are intended to apply (NPPF Para 16 d)). As Paragraph 8.2 of the LPR confirms, the area shown on the Indicative Map should be the gross site area and, as a basic principle, all land to which the policy relates should be included within the area and any policy requirement which has a spatial dimension should have its location and extent defined. In drawing indicative maps, plan makers should ask themselves whether it addresses the questions of “what, where and how?” (Basingstoke and Deane Local Plan 2011-2029 Inspectors guidance to the Borough Council on the preparation of inductive maps). Applying this basic principle, the Indicative Map for Policy RSA22 is not consistent with Paragraph 8.2.

3.11 The situation also casts doubt on how effective Policy RSA22 will be in terms of ensuring the delivery of outcomes (the parameters of Policy RSA22) by the use of planning conditions or obligations (NPPF Para 35 c)).

3.12 Accordingly, to be considered sound (irrespective of the other changes proposed by these representations), we believe that the red line boundary/gross site area shown on the Policy RSA22 Indicative Map must include, and define by reference to the Legend, the following areas:

- 1 a) the disused track running between 1 Marlston Road and the existing treed railway line, to include land for a potential walking and cycling route as part of the Hermitage to Newbury off road path.
- 2 b) land adjacent to the existing treed railway line to provide additional planting along the boundary.
- 3 c) the set back from Station Road.
- 4 **Making an Effective Use of Land**

4.1 To reflect the great weight given to conserving and enhancing landscape and scenic beauty in the AONB, the Council has undertaken an LSCA of the RSA22 site to establish whether it has the landscape capacity to accommodate development and, if so, on what basis. The LSCA concludes that the wider landscape and the landscape within the site has capacity to accommodate development on part of the site, provided it is restricted to that part of the site shown on Figure 2 and accords with a number of requirements.

4.2 Policy RSA22 includes these written requirements in full as “parameters” which development will be required to meet and the Indicative Map identifies those parts of the site which Figure 2 shows as open space and land with potential for development (the developable area).

4.3 We agree with the written conclusions of the LSCA (save for the requirement to contain development as indicated in Figure 2) and the inclusion of the LSCA’s written requirements in the text of Policy RSA22. However, we do not agree that development should be contained as indicated on Figure 2 or with the way the public open space and developable area are shown on the Indicative Map, because to do so would not achieve the most effective use of land in a way which achieves other social and environmental objectives, whilst conserving and enhancing the landscape and scenic beauty of the AONB (NPPF Paragraphs 8, 16 a), 35 d), 119, 120 a) and b), 125 and 176; and PPG Paragraph 021 Reference ID: 3-021-20190722).

4.4 In addition, it is our view that in seeking to comply with Paragraph 176 of the NPPF, the Council has simply accepted the conclusions and requirements of the LSCA in relation to the public open space and developable area as shown on Figure 2 and the Policy RSA22 Indicative Map, without giving due consideration to any reasonable alternative strategies which would conserve and enhance the landscape and scenic beauty of the AONB and, at the same time, take account of other constraints and opportunities at site level to deliver other social and environmental objectives, thereby achieving a more effective use

of land (NPPF Paragraphs 8, 16 a), 35 b), 119, 120 a) and b), 125 and 176; and PPG Paragraph 021 Reference ID: 3-021-20190722).

4.5 In support of our view, we note that Policy RSA22 provides for the development of approximately 34 dwellings within the developable area shown on the Indicative Map. Attached at Appendix 5 to these representations is a 1:1250 scale (at A2) version of the Indicative Map, which confirms that the developable area of the site is 2.53 hectares. A development of 34 dwellings on a site area of 2.53 hectares will achieve a density of 13.44 dwellings per hectare (dph).

4.6 To give an indication of how “efficient” this density is, the guidance for undertaking high level assessments of potential housing sites set out in the West Berkshire Density Pattern Book (September 2019) (WBDPB) indicates that an appropriate density for medium size sites (between 1 and 5 hectares) on the edge of a settlements in the AONB is 20 dph. The guidance takes account of the site’s location on the edge of a settlement in the AONB and, according to Paragraph 2.81, a density of 20 dph “fits with the prevailing character of many settlements in the AONB, but still seeks to make an efficient use of land”. A density of 13.44 dph even falls below the WBDPB guidance density of 15 dph for isolated sites in the AONB countryside, unrelated to settlements.

4.7 Based on this comparison alone, developing the RSA22 site at a density of 13.44 dph cannot be regarded as an efficient use of land.

4.8 However, interrogation of Stage 2a) of the HELAA confirms that in calculating the estimated development potential of the site, a density of 20 dph has been applied by the Council and it should also be noted that in determining the landscape capacity of the RSA22 site to accommodate development, the LSCA also applied the WBDPB density of 20 dph (Paragraph 1.21 of the LSCA Methodology Statement).

4.9 It therefore appears that in allocating the site for approximately 34 dwellings, the Council has not sought intentionally to restrict development to a density of 13.44 dwellings and so the figure of 34 dwellings must be the result of other decisions made by the Council at site assessment/selection stage.

4.10 Further interrogation of the HELAA and other evidence base documents indicates that the reason for the low level of housing proposed in Policy RSA22 and the resulting low density figure is that by accepting the recommendation of the LSCA to contain development to the developable area as indicated in Figure 2 (except that the Indicative Map does not include the requirement to set development back from Station Road) without considering other constraints and alternative strategies to overcome them, the Council has had to discount land within the developable area to take account of two constraints, the effect of which is to significantly reduce the capacity of the site to accommodate development. The two constraints are identified at Stage 2a) of the HELAA as “site specific issues which could affect capacity” and are:

- Landscape capacity (0.4 hectares)
- Surface water flooding on part of the site (0.4 hectares)

4.11 The effect of simply discounting land from the developable area to overcome these constraints is to reduce the “effective” developable area of the site from 2.52 hectares to 1.72 hectares, which at an appropriate density of 20 dph reduces the development potential of the site from approximately 50 dwellings to approximately 34 dwellings, as provided for by Policy RSA22.

4.12 In our view, the arbitrary approach to overcoming constraints taken by the Council at site assessment/selection stage practically rules out the prospect of development coming forward which makes better use of the potential of the site to deliver housing, not least because restricting the amount of development to approximately 34 dwellings and restricting development to the developable area shown on the Indicative Map effectively rules out the possibility of overcoming the constraints by way of a different spatial arrangement and/or the possibility that the constrained land can contribute positively to development in a way that increases the number of dwellings it will deliver.

4.13 Further, since the arbitrary discounting of 0.8 hectares from the developable area of the site represents a loss of development potential of up approximately 16 dwellings (at 20 dph), we do not believe that the effect of excluding the constrained land from calculating the development potential of the site will be negated by inclusion of the word “approximately” in the text of Policy RSA22. This is because, at application stage, the Council is unlikely accept a material departure from the Indicative Map and is likely to regard anything greater than a 10% increase in the number of dwellings (plus 3 dwellings) as “approximating” to 34 dwellings.

4.14 Taking the above matters into account, a Proposed Indicative Map is attached at Appendix 6 to these representations. In our view, it represents a reasonable alternative strategy which complies with the written requirements of part d. of Policy RSA22 and the LSCA (save for the requirement to contain development as indicated in Figure 2) to conserve and enhance the landscape and scenic beauty of the AONB but, in addition, takes account of the other constraints and opportunities which exist at site level to achieves a more effective and efficient use of the site, with the potential to deliver approximately 47 dwellings at a density of 20 dph on a developable area of 2.35 hectares.

1 Optimising the Use of Land for Housing in the AONB

5.1 Underpinning our concerns regarding the effective use of the site for housing, Paragraph 125 of the NPPF makes it clear that where there is an existing or anticipated shortage of land for housing to meet identified housing needs, it is “especially important that planning policies and decisions.....ensure that development makes optimal use of the potential of each site”. Sub paragraph a) of Paragraph 125 goes on to say that “plans should contain clear policies to optimise the use of land in their area and meet as much of the identified need for housing as possible, This will be tested robustly at examination.....”.

5.2 Whilst Paragraph 119 is mainly about densities and the efficient use of land, it is clear from the phrase “make optimal use of the potential of each site” that it applies equally to how much land within a site could be developed (the developable area) and how other land within a site is utilised to enable the full potential of a site to be realised, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions (NPPF Paragraph 119).

5.3 Against this background, we do not believe the social objective of meeting as much of the identified housing needs of an area by making optimal use of land for housing is inconsistent with the environmental objectives of the NPPF and, in particular, the great weight given by Paragraph 176 to conserving and enhancing the landscape and scenic beauty of the AONB. On the contrary, it seems clear that in the AONB, the application of a highly restrictive policy means that there is a finite supply of land for housing and given the need for allocated housing sites to be available, suitable and achievable, there will inevitably be a shortage of housing land in the AONB to meet the identified housing needs of the AONB spatial area at the point of need.

5.4 In these circumstances, it is apparent that provided development conserves and enhances the AONB, optimising the use of allocated housing sites in the AONB and Paragraph 176 are mutually supportive, not least because optimising the use of allocated housing sites reduces the pressure to develop less suitable sites elsewhere in the AONB. Accordingly, we believe that the use of allocated housing sites in the AONB should be optimised and that this is especially important because of the role new housing in the AONB will play in supporting local communities, services and facilities.

5.5 The Council will not openly admit to there being an existing or anticipated shortage of housing land in the AONB to meet local housing needs, although we believe the position is acknowledged implicitly by Policy SP2, which refers to the AONB as having “*appropriate and sustainable development*” rather than giving a specific housing requirement for the AONB for the plan period, against which the housing delivery/supply situation would be clear.

5.6 Further, at Section 5.1.1 of the SA/SEA Environmental Report (November 2022), the Council confirms that under the adopted West Berkshire Core Strategy (2006-2026) (CS) only 19% of all housing being built in the district is located within the AONB; and in concluding the CS was sound, the CS Inspector made it clear that “*A much greater focus on urban areas would undermine the vitality of rural settlements, particularly larger settlements such as Hungerford and provision to meet at least some local housing needs in these settlements*”. Against this background, Table 11 of the SA/SEA Environmental Report confirms that a (housing distribution) strategy which has a reduced focus on the AONB is to be taken forward in the LPR and acknowledges that “*the strategy will require development elsewhere in the district, which could mean that sites less suitable for development are required to meet local housing need.*”

5.7 In this context, the West Berkshire Housing Needs Assessment Update (July 2022) describes the housing need situation in the district as “*clear and acute*”. However, the position is particularly bad in the AONB spatial area, where the estimated need for affordable and social housing is 152 dwellings per annum (dpa), which accounts for 46% of the districts total need for 330 dpa (2021 base date), even though the number of people living in the AONB is only about 30% of the total population of the district.

5.8 This acute situation is only set to get worse as a result of the reduced focus of development on the AONB over the LPR plan period. The AONB housing site allocations under Policy SP15 of the LPR will deliver approximately 414 new dwellings over the period 2022-2039, at an average annual rate of 24 dpa. Of these, a maximum of 166 dwellings will be affordable or social housing (based on 40%), delivered at an average annual rate of 10 dwellings, compared to the estimated need in the AONB for 152 dpa. Put another way, the total number of affordable and social homes to be delivered in the AONB over the 17-year plan period is only enough to meet just over one year’s housing needs.

5.9 Whilst we accept that some affordable and social housing may come forward over the LPR plan period on sites in the AONB which are granted permission under LPR Policy DM17 (Rural Exception Sites), we do not expect these sites to make a significant contribution towards meeting local housing needs in the AONB, because they are required to be small-scale and will still need to overcome the “high bar” set by Paragraph 176 of the NPPF. Therefore, since the AONB housing sites allocated under Policy SP15 are likely to be the primary source of affordable and social housing to meet the local housing needs of the AONB, it is all the more important that optimal use is made of their potential.

5.10 The importance of optimising the use of land for housing in the AONB spatial area applies equally at individual settlement level. The executive summary of the Hermitage Housing Needs Study (May 2021) (HNS) attached at Appendix 7 identifies the need for additional market housing of all types and the need for 24 additional affordable homes over the 5-year period from 2021. In giving reasons for this, the HNS confirms that:

- There is virtually no supply of affordable home ownership housing in the Parish.
- There has been no additional affordable housing of any type built in the Parish in recent years.
- About half of existing households in housing need want to stay in the Parish.
- Nearly 90% of newly forming households plan to leave the Parish.

5.11 Against this backdrop of local housing need, it is relevant to note that the RSA20, RSA21 and RSA22 sites represent the only suitable housing sites in Hermitage remaining to be developed within the LPR plan period and beyond. There are no sizeable sites within the settlement boundary which could come forward for housing development and no other sites on the edge of the settlement can be developed without extending the settlement beyond its current outer limits and encroaching into the open countryside. Only one other site on the edge of Hermitage was assessed in the HELAA as “potentially suitable” at Stage 2b) (the HER5 site), but following a landscape sensitivity and capacity assessment, it was rejected because of the harm it would cause to the AONB in terms of encroachment, coalescence and visual impact.

5.12 For these reasons, we believe that subject to meeting the written requirements of part d. of Policy RSA22 and the LSCA (save for the requirement to contain development as indicated in Figure 2) to conserve and enhance the landscape and scenic beauty of the AONB and overcoming landscape capacity and surface water flood risk constraints, it is important that the potential of the RSA22 site for housing is optimised and that this matter is subject to robust assessment at examination stage.

1 The set back from Station Road

6.1 The LSCA recommends that development on the site should be set back from Station Road to retain the character and the setting of the mature roadside trees. This requirement has been included in the

text of Policy RSA22 (part d. iv.) but, for some unaccountable reason, is not shown on the Indicative Map, in such a way that it reduces the developable area of the site.

6.2 However, interrogation of Stage 2a) of the HELAA leads us to believe that the “landscape capacity” constraint, which is identified as a “*site specific issue which could affect capacity*” and the set back from Station Road are one and the same. So, in calculating the estimated development potential of the site, the Council has had to discount part of the developable area shown on the Indicative Map to take account of the set back from Station Road. This is reflected in the fact that whilst the developable area of the site shown on the Indicative Map is 2.53 hectares, the developable area identified at Stage 2a) of the HELAA is 2.1 hectares (-0.43 hectares). It is therefore apparent that the Council has discounted 0.43 hectares from the developable area to take account of the set back and this is reflected in the Stage 2a) estimated development potential of the site of 42 dwellings (2.53 hectares at 20 dph = 50 dwellings, less 0.43 hectares at 20 dph = @42 dwellings).

6.3 The set back shown on Figure 2 of the LSCA extends along Station Road for a length of 100 metres which, given the discount of 0.43 hectares applied by the Council, suggests that the Council requires development to be set back 40 metres from the inner edge of Station Road. Whilst we agree with the set back requirement, we do not agree that development needs to be set back 40 metres wide from Station Road to meet the stated landscape objectives of Policy RSA22 d. iv., with the result that it unnecessarily reduces the development potential of the site by up to 8 dwellings.

6.4 Considering this matter further, we would suggest that the width of the set back assumed for the purposes of discounting land from the developable area and estimating development potential has been arrived at in error. In this regard, we note that the set back shown on Figure 2 of the LSCA (identified as a landscape buffer in the Legend) appears to be 30-40 metres wide and that it extends right up to the boundary with properties on Hermitage Green, such that Station Road and the intervening verge are included within it.

6.5 In contrast, the developable area shown on the Indicative Map only extends up to the inner edge of Station Road. Therefore, if a 30-40 metre wide set back/landscape buffer has been assumed by the Council for the purposes of discounting land from the developable area and estimating development potential; and has been measured from the inner edge of Station Road, it has reduced the developable area/development potential of the site far more than is necessary or intended to achieve the landscape objectives of Policy RSA22 d. iv.

6.6 Assuming that an error has been made at Stage 2a) of the HELAA and that the set back/landscape buffer required is broadly as shown on Figure 2 of the LSCA, we consider that the most appropriate way to achieve the landscape objective of retaining the rural character and the setting of the mature roadside trees is to create a dense tree-lined native species hedgerow along the inner edge of Station Road, not least because such a feature is characteristic of the Hermitage Wooded Commons/Cold Ash Woodland and Heathland Mosaic landscape character areas in which the site is located. This would require a set back of not more than 15 metres from the inner edge of Station Road, which will be more than sufficient to provide effective screening of the development and will afford maximum protection to the root systems of the mature roadside trees (BS5837: 2012 Trees in Relation to Design, Demolition and Construction establishes a national limit on the radius of tree protection areas of 15 metres, irrespective of tree size).

6.7 If accepted, the 15 metre set back/landscape buffer should be indicated on the Indicative Map as shown on the Proposed Indicative Map at Appendix 6. This will reduce the developable area of the site by 0.16 hectares to 2.37 Hectares which, at 20 dph, reduces the development potential of the site from approximately 50 dwellings to approximately 47 dwellings.

1 Surface Water Flood Risk

7.1 Stage 2b) of the HELAA identifies that the updated DEFRA/Environment Agency Surface Water Flood Map (Appendix 8) shows two low risk flood paths running across the RSA22 site as shown on the Indicative Map, which converge at the centre to create two medium and high risk pooling areas.

7.2 Stage 2a) identifies that 3% of the site is at risk of surface water flooding in the 1 in 30 year event, 5% in the 1 in 100 year event and 17% in the 1 in 1,000 year event. The HELAA also identifies a further area of high risk flooding along the disused track leading to Marlston Road, concluding that surface water flood risk covers about 20% of the site (albeit the further area of high risk flooding lies outside of the gross site area shown on the Indicative Map).

7.3 At Stage 2c) (Deliverability), the HELAA concludes that those parts of the site subject to surface water flood risk would be unsuitable and development would need to be avoided in these areas. This conclusion is reflected in the Sequential Test Report (January 2023), which states “*A small part of the site (19%) is at risk of flooding and using the sequential approach development could be accommodated outside of this area.*”

7.4 The Stage 2a) HELAA assessment had already discounted 0.43 hectares from the developable area of the site to take account of the set back from Station Road, resulting in an “effective” developable area of 2.1 hectares and an estimated development potential of 42 dwellings (Paragraph 6.3 above). The eventual allocation of the RSA22 site is for approximately 34 dwellings, so it can be deduced that during the site assessment/selection process the amount of land discounted from the developable area to avoid development on land at risk of surface water flooding is 0.4 hectares ((42 – 34) divided by 20 dph). This represents a loss of development potential of 8 dwellings.

7.5 An area of 0.4 hectares corresponds to about 20% of the effective developable area of 2.1 hectares ((2.1 divided by 100) x 20dph = 0.43 hectares). Therefore, it is apparent that the Council has adopted an “absolute avoidance” approach to surface water flood risk at site assessment/selection stage rather than a sequential approach; and so regardless of the level of risk involved, 100% of the land at surface water flood risk within the developable area has been discounted, to arrive at the Policy RSA22 allocation of approximately 34 dwellings. No consideration has been given to the fact that the areas of medium and high risk within the developable area account for no more than 10% of the total area at risk of flooding; that areas at low risk can contribute to the effective use of land by accommodating less vulnerable

elements of the development; or that wider sustainable development objectives should be taken into account.

7.6 We do not consider this approach and the resulting allocation of approximately 34 dwellings is justified because it stems from the Council simply accepting the written recommendations of the LSCA in relation to the public open space and developable area shown on Figure 2, without giving due consideration to reasonable alternatives in the form of a different spatial arrangement which meets the written requirements of Policy RSA22 d. and the LSCA (save for the requirement to contain development as indicated in Figure 2) and, at the same time, overcomes the surface water flood risk constraint and makes more effective use of the site for housing.

7.7 In addition, we do not consider the approach followed by the Council to be consistent with NPPF Paragraphs 159, 161 and 163 in relation to how the sequential approach to flood risk should be applied to plan-making or the sequential approach set out in the West Berkshire Strategic Flood Risk Assessment (November 2022) (WBSFRA). In particular, NPPF Paragraph 163 states that *"If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied"*. This statement makes it clear that reasonable ("possible") alternatives to overcoming surface water flood risk should be considered at site assessment/selection stage and if such alternative(s) fail to locate development in areas with a lower risk of flooding, the exception test may need to be applied. Against this policy background, we regard it as unfortunate that the Council has adopted an "absolute avoidance" approach rather than consider reasonable alternatives which take wider sustainable development objectives (the effective use of land) into account.

7.8 In considering reasonable alternatives, Paragraph 159 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Accordingly, Paragraph 161 requires all plans to apply a sequential, risk-based approach to the location of development, *"...so as to avoid where possible, flood risk to people and property"*. They should do this, and manage any residual risk, by adopting a number of measures, including:

- 1 a) applying the Sequential Test and then, if necessary, the exception test.
- 2 c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

7.9 Planning Policy Guidance Paragraph:023 Reference ID: 7-023-20220825 states that the aim of the sequential approach is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas of higher risk and NPPF Paragraph 162 confirms that the aim of the sequential test is to steer development to areas at least risk of flooding from any source (our emphasis).

7.10 In addition to following the sequential approach, Paragraph: 004 Reference ID: 7-004-20220825 of the PPG advises that avoidance of flood risk in plan and decision making can be achieved by the following:

- Substituting lower vulnerability uses for higher vulnerability uses.
- Within sites, using site layout to locate the most vulnerable aspects of development in areas of least flood risk, unless there are overriding reasons to prefer a different location.

7.11 Based on the above considerations, the Site Analysis Plan at Appendix 9 shows how a sequential, risk-based approach has been used to inform the alternative spatial arrangement between public open space and the developable area shown on the Proposed Indicative Map at Appendix 6. It demonstrates how the spatial arrangement:

- Avoids development in areas of medium and high risk surface water flooding, by excluding the land from the developable area and incorporating it into the public open space (a water compatible use).
- Locates dwelling houses (a more vulnerable use) in areas at no or low risk.

7.12 In addition, the illustrative masterplan at Appendix 10 shows how, within the developable area, site layout can be used to locate the least vulnerable elements of the development (roads, pedestrian/cycle links, amenity space, rear gardens) in areas of low risk. Further, since the roads and pedestrian/cycle links follow the path of the flood flows, they can be designed to channel the flow of water during a surface water flood event.

7.13 The inclusion of the medium and high risk areas of the site as well as about 50% of areas at low risk within the public open space shown on the Proposed Indicative Map means that only about 0.2 hectares of the developable area is at low risk of surface water flooding. Even if the area at low risk of flooding is discounted from the developable area of 2.37 hectares (allowing for the exclusion of the set back from Station Road of 0.16 hectares referred to in Section 6 above), this leaves an "effective" developable area of 2.35 hectares, which at an appropriate density of 20 dph, results in a development potential of 47 dwellings.

7.14 Section 5.3.1 of the WBSFRA confirms that for the purposes of Level 1 Strategic Flood Risk Assessment, a site is at low risk if less than 10% is at risk of surface water flooding in the 1 in 1,000-year event. Based on the Proposed Indicative Map, the 0.2 hectares of land within the developable area at low risk of surface water flooding represents 8.5% of the developable area. Accordingly, as Figure 5-2 of the WBSFRA confirms, the sequential test is passed.

8 Spatial Arrangement of the Public Open Space and Developable Area

8.1 As previously stated, we do not consider the spatial arrangement between the public open space and the developable area shown on the Policy RSA22 Indicative Map to be an effective use of land and whilst we believe the spatial arrangement shown on the Proposed Indicative Map will achieve a more effective use of land for housing and public open space which will deliver other sustainability benefits, we recognise that in accordance with Paragraph 176 of the NPPF and Policy SP2 of the LPR, it is necessary to demonstrate that the alternative arrangement is at least as effective in meeting the written requirements of Policy RSA22 d. and the LSCA (save for the requirement to contain development as indicated in Figure 2).

8.2 The public open space (POS) shown on the Indicative Map has an area of 1.28 hectares (1.15 hectares taking account of the change required to the northern site boundary identified in Section 3 above), which is substantially larger than the 0.27 – 0.38 hectares required under LPR Policy DM40 in accordance with the NPFA standard of 3-4.3 hectares per thousand population.

8.3 We do not object to this level of provision since it will make a significant contribution to the recreational and visual amenities of the settlement. More importantly however, we agree with the LSCA that containing development to part of the site and providing a substantial public open space is necessary to conserve and enhance the landscape and scenic beauty of the AONB because; it will retain existing public views across the RSA22 site to the wooded skylines of Grimsbury Wood to the south and Roebuck Wood to the north; and by creating new public views of these skylines from within the site, it will enhance the visual links between the settlement and wider landscape.

8.4 However, we note that the POS shown on Figure 2 of the LSCA and the Policy RSA22 Indicative Map has an elongated form which extends across the entire length of the northern boundary of the RSA22 site. We do not consider this to be an effective use of land so we believe it is relevant to consider whether the alternative spatial arrangement between the POS and developable area shown on the Proposed Indicative Map would also be effective in retaining and enhancing visual links to Grimsbury Wood and Roebuck Wood.

8.5 Interrogation of the LSCA identifies the following existing and potential visual links which require consideration:

The public view across the site of Roebuck Wood from a short section of the public highway on Station Road, adjacent to the junction with Hermitage Green (LSCA viewpoint photo's 4 and 5).

- The public view across the site of Grimsbury Wood from Charlotte Close (LSCA viewpoint photo's 6 and 7).
- Potential visual link across the site to Grimsbury Wood from the RSA20 site (post development).
- Potential visual link across the site to Grimsbury Wood from the RSA21 site (post development).
- Potential visual links to Roebuck Wood and Grimsbury Wood from the RSA22 public open space (post development).

8.6 At Appendix 11 is an assessment of how development of the RSA22 site would impact upon the existing view across the site to Roebuck Wood from the public viewpoint on Station Road. In short, it demonstrates that provided development does not extend beyond the line of sight from the viewpoint out to the edge of Roebuck Wood, the visual link will be retained. The line of sight has been added to the Site Analysis Plan at Appendix 8 to demonstrate how the spatial arrangement shown on the Proposed Indicative Map optimises the development potential of the site, whilst at the same time retaining the public view of Roebuck Wood from Station Road (and overcoming surface flood risk constraints).

8.7 The existing visual link from Charlotte Close to Grimsbury Wood shown on LSCA viewpoint photo's 6 and 7 is of a wooded horizon viewed above and between the trees on the south eastern boundary of the RSA20 site, which it shares with the RSA22 site. The views between and over the boundary trees continue across the RSA22 site and the spatial arrangement between the POS and developable area shown on the Indicative Map is intended to allow for this. However, the POS shown on the Proposed Indicative Map is broader at this point and the developable area is set further back from the RSA20/RSA22 boundary, such that it is even more likely to achieve the retention of the visual link to Grimsbury Wood

8.8 Development of the RSA20 site has the potential to create new public views across the RSA22 site to Grimsbury Wood and, in this regard, LPR Policy RSA20 g.iii. requires the development to maintain the views through and over the built form to the woodland beyond. However, the soft landscaping plans approved under full planning permission for the erection of 16 dwellings on the RSA20 site (ref 20/00912/FULEXT) show new tree and hedgerow planting along the boundary, with the new trees being located to infill the gaps between the existing boundary trees. This new boundary planting within the RSA20 site is likely to weaken the visual link from the site to Grimsbury Wood but, for the reasons stated above, the spatial arrangement between the POS and developable area shown on the Proposed Indicative Map is more likely to retain whatever visual link remains.

8.9 Development of the RSA21 site has the potential to create new public views across the RSA22 site to Grimsbury Wood. The spatial arrangement shown on the Indicate Map shows development set back from the boundary with the RSA21 site for its entire length to allow for this, whereas the arrangement shown on the Proposed Indicative Map shows development extending up to the boundary with the RSA21 site for part of its length. This suggests it will be less effective in creating new visual links from the RSA21site to Grimsbury Wood.

8.10 However, this simple comparison does not take account of the landscape buffer which will be planted along the boundary of the two sites in advance of any development on the RSA21 site taking place. This is a requirement of LPR Policy RSA21 and is in accordance with Condition 5 of outline permission 19/02993/OUTMAJ, which has been part-discharged by the approval of a detailed landscape buffer plan (ref 20/02413/COND2).

8.11 Condition 5 requires that the landscape buffer is planted as woodland edge and hedgerow and includes large native trees and woodland edge mix, including oak and wild cherry. The reason given for Condition 5 is to ensure the landscape buffer provides a good level of screening...given the high sensitivity of the surrounding AONB open countryside. Accordingly, the approved landscape buffer plan shows a mix of woodland edge and hedgerow planting, including 34 native trees (as replicated on the Landscape Strategy Plan at Appendix 3). Taking account of the significant screening effect the landscape buffer will have, we believe that development of the RSA21 site will provide only a limited opportunity to enhance the AONB by creating a new visual link from the RSA21 site, across the RSA22 site, to Grimsbury Wood. Therefore, we do not believe it is necessary to contain development on the RSA22 site as indicated in Figure 2 of the LSCA and shown on the Policy RSA22 Indicative Map, especially given the wider sustainability objectives an alternative spatial arrangement can achieve.

8.12 The inclusion of a substantial public open space within the RSA22 site will create new public views of Grimsbury Wood and Roebuck Wood which will enhance visual links from the settlement to the wooded skylines of the surrounding AONB. The area of the POS shown on the Proposed Indicative Map (1.17 hectares) is slightly larger than the POS shown on the Policy RSA22 Indicative Map (1.15 hectares, allowing for the change to the northern boundary) and so is likely to be just as effective in creating new public views of Grimsbury Wood to the south and Roebuck Wood to the north.

8.13 Based on the above assessment, we believe the spatial arrangement shown on the Proposed Indicative Map will be just as effective in retaining and enhancing visual links from the settlement to the wooded skylines of Grimsbury Wood and Roebuck Wood.

8.14 We also note that the LSCA and Policy RSA22 d. include a requirement for development to *“be set adjacent to the rear gardens of Lipscomb Close to avoid an open edge to the rear gardens”* because the open edge detracts from the appearance of the site. However, the POS shown on the Indicative Map extends right up to the boundary with Lipscomb Close, so part of the open edge will remain visible and the adjacency of the POS to the open edge Close could adversely affect the privacy and amenities of the residents. Therefore, by extending the developable area up to the northern boundary of the RSA22 site, the spatial arrangement shown on the Proposed Indicative Map will be more effective in meeting the requirement of Policy RSA22 d. v.

8.15 In addition to retaining and enhancing visual links with the wooded skylines and avoiding the open edge to the Lipscomb Close boundary, the LSCA recommends that should development on part of the site be taken forward, this would require *“careful consideration of a central open space, which could have the character of a village green.”* We are strongly of the view that such consideration should be given to this matter at plan making stage and not left to application stage, not least because it may be difficult at application stage to secure planning permission for a development which represents a material change to the parameters shown on an Indicative Map in an adopted local plan.

8.16 We also believe the LSCA proposes careful consideration is given because it is itself uncertain of the role and function of the space within the settlement or the site itself. On the one hand, the LSCA refers to it as a central open space, which acknowledges that the space will occupy a central location within the built form of the settlement following the development of the RSA20, RSA21 and RSA22 sites; and given its central position, it could act as a focal point for the surrounding built form and bringing the community together, in keeping with the role and character of a “traditional” village green. We agree with this approach, not least because it will help to integrate the new housing on the RSA22 site as well as the existing housing on Hermitage Green into the physical and social fabric of the community.

8.17 On the other hand, the recommendations of the LSCA state that the development on the RSA22 site *“should be contained as indicated in Figure 2”* and, by reference to the Legend, Figure 2 identifies the central open space as a “landscape buffer”. Such references suggest that the new housing on the RSA22 site will somehow be harmful to or incompatible with the rest of the settlement and needs to be kept separate or apart from it, which would explain the elongated form of the POS and why it extends the entire length of the site’s northern boundary. In our view, this has the effect of segregating the new housing from the rest of the settlement (in much the same way as Hermitage Green is isolated today) and is the exact opposite of what the POS should be achieving in wider place shaping terms (NPPF Paragraphs 126 and 130; the National Design Guide; and Policy SP7 and Paragraph 5.30 f. of the LPR).

8.18 To illustrate this point, the masterplan at Appendix 10 shows how the alternative spatial arrangement of the public open space and developable area on the Proposed Indicative Map will achieve a more cohesive and legible arrangement of built form and open space, which brings the new housing on the RSA20, RSA21 and RSA22 sites together around a central open space that has the character of a village green. In turn, the open space forms a centrepiece to the new housing that will frame and overlook it. As Paragraph 5.28 of the LPR states (para-phrasing the Building Better, Building Beautiful Commission) *“...new development should be designed to fit in to the life and texture of the place where it occurs and should also aim to be an improvement of that place.”*

8.19 On the basis of the above, we conclude that the elongated form and extent of the POS shown on the Indicative Map is potentially harmful in terms of segregating the new housing from the rest of the settlement. Nor will it make the most of the opportunity presented by the requirement for a central open space to provide a focal point for the settlement and integrate the new housing in to the physical and social fabric of the community. These objectives will be better served by the spatial arrangement of the POS and developable area shown on the Proposed Indicative Map.

8.20 In giving careful consideration to the POS it is also relevant to consider Policy DM40 of the LPR and supporting text, which set out the factors to be taken into account in relation to the provision of high quality public open space. These include:

- Location, size, condition and nature of the land.
- Attractiveness, interest, multifunctionality, inclusivity and safety of the design, layout and Facilities.
- Suitability of the site for an appropriate range of recreational activities, both formal and informal.
- Contribution to achieving biodiversity net gains.

8.21 Taking these factors into account, we believe that the potential of the POS shown on the Indicative Map to achieve a high quality public open space is restricted by its elongated form. Whilst it is 255 metres wide and has a maximum depth of 78 metres at its centre, this quickly tapers off to a depth of 27 metres on the Lipscomb Close boundary (allowing for the adjustment to the northern boundary) and 14 metres on the Station Road boundary. These dimensions restrict the potential to accommodate a wide range of recreational activities and, in particular, the narrowness of the space adjacent to Lipscomb Close will limit its recreational use and peaceful enjoyment.

8.22 In addition, by excluding an area of surface water pooling and a flow path from the POS, the spatial arrangement shown on the Indicative Map will not fulfil its potential to perform a range of functions and

achieve multiple benefits by contributing towards flood risk avoidance and management and achieving net biodiversity gains through the creation of new wetland habitats (NPPF Paragraph 120 a) and b).

8.23 In contrast, the area of POS shown on the Proposed Indicative Map is of a similar size (1.17 hectares), which is substantially larger than the 0.37-0.53 hectares required by LPR Policy DM40 for a development of 47 dwellings. However, it has a far more regular shape, with a width of between 115 and 160 metres and a depth of 85 metres. This provides the opportunity to deliver a higher quality POS, because it can accommodate a wider range of formal and informal recreational activities (especially organised/team sports) and achieve a greater sense of tranquility and quiet enjoyment of the space.

8.24 In addition, the proposed area of POS includes a larger area of land at risk of surface water flooding, so it has greater potential to contribute towards flood risk avoidance and management and achieving net biodiversity gains through the creation of wetland habitats. In turn, the creation of new wetland habitats has the potential to contribute towards, the mitigation of nutrient pollution (LPR Policies DM6 and RSA22 h. refer).

8.25 For the above reasons, we believe that the area of POS shown on the Proposed Indicative Map has the potential to deliver a higher quality public open space than the POS shown on the Indicative Map, and will deliver the wider objectives sought by Paragraphs 98 and 120 a) and b) of the NPPF and Policies SP7 and DM40 of the LPR.

8.26 For the above reasons, we believe that compared with the spatial arrangement shown in Figure 2 of the LSCA and on the Policy RSA22 Indicative Map, the arrangement of the POS and developable area shown on the Proposed Indicative Map at Appendix 6 is better able to meet the written requirements of the LSCA and Policy RSA d. (save for the requirement to contain development as indicated in Figure 2) aimed at conserving and enhancing the AONB whilst achieving other sustainable development objectives, including optimising the use of the site for housing.

1 Highway Access

9.1 We agree that highway access to the site can be provided off Station Road as stated in Policy RSA22 b. and shown on the Indicative Map.

9.2 However, the Council's highway team has raised concerns about the impact of additional traffic on the B4009 Newbury Road/Priors Court Road/Station Road roundabout and to address these concerns, Policy RSA22 c. requires a Transport Assessment to be undertaken at application stage.

9.3 Reliance on Station Road to accommodate all development traffic means 100% of vehicle trips will pass through the roundabout junction and so there will be limited flexibility to address any highway capacity or safety concerns in relation to the roundabout junction that may arise at application stage. So, in our view, Policy RSA22 and the Indicative Map should identify additional access options which would help to reduce the potential highways impact on the roundabout by allowing at least some of the development traffic to disperse via the local highway network without having to use the roundabout junction. This will provide flexibility at application stage to overcome any highway capacity or safety concerns in relation to the roundabout junction that may be identified through transport assessment and increases the prospects of the development being delivered. An additional access could serve just part of the development on the RSA22 site, or the internal road layout within the site could be designed to connect the additional access to the access off Station Road, which would give all development traffic the option of avoiding the roundabout junction altogether. We believe this approach is consistent with Paragraph 104 of the NPPF.

9.4 In this regard, there are two additional access options which we consider to be available, suitable and achievable. These are shown on the Proposed Indicative Map at Appendix 6 and are as follows:

- 1 a) Off B4009 Newbury Road
- 2 b) Off Lipscomb Close

Availability

9.5 Both access options pass through the Old Farmhouse/RSA21 site, which is largely owned by the housebuilder TA Fisher and Sons (Fishers) and is currently the subject of a reserved matters application (ref 21/02923/RESMAJ) submitted pursuant to outline permission 19/02993/OUTMAJ. The outline permission was granted subject to a condition approving the details of a priority junction on Newbury Road to access the site and the reserved matters application includes details of a 5.5-metre-wide access road with footways extending up to the landscape buffer adjacent to the RSA22 site.

9.6 Fishers freehold interest in the Old Farmhouse/RSA21 site was acquired in 2019 and the HM Land Registry Form TP1 (Appendix 4) which documents the terms of the conveyance includes binding legal covenants upon Fishers and rights of access in favour of the current joint owners of the RSA22 site to extend the RSA21 site access road across the landscape buffer and allow for its use in connection with residential development on the RSA22 site. Accordingly, access to the RSA22 site from Newbury Road, via the Old Farmhouse/RSA21 site, is available.

9.7 The conveyance of the Old Farmhouse/RSA21 site documented in the HM Land Registry Form TP1 did not include the parcel of land within the RSA21 site which extends from the boundary with the RSA22 site to the adopted highway on Lipscomb Close (Appendix 4). This land remains in the joint ownership of the RSA22 site owners and is available for the formation of an access road from Lipscomb Close to serve development on the RSA22 site. LPR Policy RSA21 provides for access to be taken from Lipscomb Close to serve development on the RSA21 site but, in accordance with outline permission 19/02993/OUTMAJ and the binding covenants documented in the HM Land Registry Form TP1, development on the RSA21 site will be accessed from Newbury Road only and so the access from Lipscomb Close to serve development on the RSA21 site is not required.

9.8 Accordingly, there are no planning, ownership or legal constraints which would affect the availability of the two additional access options to serve development on the RSA22 site.

Suitability

9.9 The Council has already accepted that access off Newbury Road is suitable to serve a development of up to 21 dwellings on the Old Farmhouse/RSA21 site (Policy RSA21 and outline permission 19/02993/OUTMAJ refer) and the priority junction/site access road proposed as part of the reserved matters application 21/02923/RESMAJ have the capacity to serve a significantly larger number of dwellings than this.

9.10 As confirmed by Policy RSA21 and the Indicative Map, the Council has already accepted in principle that access off Lipscomb Close is suitable to serve a development on the RSA21 site of approximately 10 dwellings and there can be no highway or planning reason why this would not also apply to the access serving development on the RSA22 site. Such an arrangement is shown on the masterplan at Appendix 10.

Achievability

9.11 We believe that both additional access options are achievable. The RSA22 site is identified in the HELAA as being “potentially developable in part”, which means the Council considers there is a reasonable prospect that development of the site would be delivered within years 6-10 of the LPR plan period and given the need prior mitigation of nutrient pollution and essential network upgrades at the Chieveley Sewage Treatment Plant (Policy RSA22 h. and i.), this timeframe seems realistic. In this context, the development of the RSA21 site is at an advanced (reserved matters) planning stage and Fishers have confirmed to the Council that it is their intention to complete development by 2025/26.

9.12 We are not aware of any factors which would affect the economic viability of developing the RSA21 site or Fishers capacity to complete the development at the point they envisage.

9.13 For all the above reasons, we consider that the identification of additional access options is both desirable and deliverable. Therefore, we propose that Policy RSA22 b. is amended refer to access being provided by Station Road and either Newbury Road or Charlotte Close and the Indicative Map is amended to show the additional points of access.

9.14 To avoid ambiguity, reference in Policy RSA21 to access being provided by Lipscomb Close should be deleted and the Indicative Map amended accordingly.

1 Walking and Cycling Links

10.1 Policy RSA22 b. requires walking and cycling links to the RSA20 and RSA21 sites. Whilst such a link (or links) to the RSA21 site can be delivered because of the legal covenants and rights in favour of the joint owners of the RSA22 site documented in the HM Land Registry Form TP1, a link to the proposed footpath/cycleway on the RSA20 site cannot be delivered because the land required to achieve this is not owned or controlled by the local highway authority or the RSA22 site joint owners

10.2 However, we believe it would be possible to provide a walking and cycling link from the RSA22 site to the existing pedestrian/cycle link running parallel to the adopted section of Station Road, as shown on the plans at Appendices 6 and 10. Accordingly, we propose that the reference in Policy RSA22 b. to a walking and cycling link to allocation RSA20 (Charlotte Close) is removed and replaced by reference to a link to Station Road; and that the Indicative Map is amended accordingly.

10.3 With regard to the reference in Policy RSA22 b. to “*taking opportunities to make these linkages part of a Hermitage to Newbury off road path*”, we believe it is important to read this in conjunction with Paragraph 12.98 of the LPR, which states:

“Specifically, this could include opportunities to replace that part of the former Didcot, Newbury and Southampton railway line to provide between Hermitage and Hampstead Norreys, a route for both leisure and potentially commuter use, incorporating existing minor roads and bridleways as a walking, cycling and pedestrian route” (aka Eling Way)

10.4 Taken together, these statements reflect the Council’s long-term ambition to deliver a continuous off road recreational/commuter route from Newbury, via Hermitage, to Hampstead Norreys.

10.5 The development of the RSA22 site represents a significant opportunity to deliver a critical section of this route from Eling Way (which currently terminates at Marlston Road), along the disused track which runs between 1 Marlston Road and the disused railway line and across the site, to connect with the Newbury to Hermitage off road path along Station Road and/or via the proposed pedestrian/cycle link running across the RSA20 and RSA21 sites (see the plans at Appendices 6 and 10).

10.6 In our view, this is a far superior option to the one currently being considered by the Council, which involves an on road section along Marlston Road and Lipscomb Close, which we consider to be unsafe.

10.7 However, the LPR Policy RSA22 Indicative Map does not make provision for this. Therefore, to provide clarity and secure delivery of this section of the route, we propose that the Indicative Map is changed to include all of the land required within the RSA22 site boundary to deliver the link, plus a “walk and cycle link” notation along the disused track.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Yes

Please give reasons for your answer

4. Proposed Changes

Proposed changes to the text of Policy RSA22

Policy RSA22 a.

Proposed change: Delete the words “*approximately 34 dwellings*” and replace with “*approximately 47 dwellings*”.

Reasons: The change is required to ensure that Policy RSA22 is:

- 1 b) Justified i.e. it is the most appropriate strategy for achieving sustainable development on the RSA22 site, taking into account the reasonable alternatives, based on proportionate evidence.
- 2 d) Consistent with national policy i.e. it will enable the delivery of sustainable development which makes a more effective use of land for housing and achieves other social and environmental objectives in accordance with the policies of the Framework and other statements of national planning policy (as listed in Paragraph 4.3 of these representations) .

Policy RSA22 b. (change 1 of 2)

Proposed change: After “Station Road,” add the words “and either Newbury Road or Lipscomb Close”.

Reasons: The change is required to ensure that Policy RSA22 is:

b) Justified i.e. it is an appropriate strategy taking into account the reasonable concerns of the local highway authority regarding the potential impact of development traffic on the B4009 Newbury Road/Priors Court Road/Station Road roundabout junction.

- 1 c) Effective i.e. it allows some flexibility at application stage to overcome the potential impact of additional traffic on the B4009 Newbury Road/Priors Court Road/Station Road roundabout, to enable the delivery of development on the RSA22 site within the plan period.
- 2 d) Consistent with national policy i.e. it addresses the potential impact of developing the RSA22 site on the local transport network, in accordance with Paragraph 104 of the NPPF.

Policy RSA22 b. (change 2 of 2)

Proposed change: Delete the words “to the allocations RSA20 (Charlotte Close) and RSA21 (Old Farmhouse).” and replace with “to Station Road and the RSA21 (Old Farmhouse) allocation”.

Reasons: The change is required to ensure that Policy RSA22 is:

- 1 b) Justified i.e. it is an appropriate strategy for providing walking and cycling links given that the link to the RSA20 (Charlotte Close) allocation is not achievable.
- c) Effective i.e. it is deliverable over the plan period.

Proposed changes to the Policy RSA22 Indicative Map (as shown on the Proposed Indicative Map at Appendix 6)

The “red line” site boundary and gross site area (change 1 of 2)

Proposed change: The northern boundary of the RSA22 site needs to be amended to reflect the availability of land for development.

Reasons: The change is required to ensure that Policy RSA22 is:

- 1 c) Effective i.e. it does not include any land which is not available for development of the RSA22 site, such that development proposals including the land would not be deliverable.
- 2 d) Consistent with national policy i.e. it ensures that Policy RSA22 is unambiguous, so it is evident to all parties what land is available for inclusion in development proposals.

The “red line” site and gross site area (change 2 of 2)

Proposed change: The south eastern boundary of the site needs to be changed to include within the red line and gross site area all of the land to which the parameters of Policy RSA22 relate, specifically land which is required to meet the provisions of Policy RSA22 b. in relation to the Hermitage to Newbury (and Hermitage to Hampstead Norreys) off road path; and land which is required to meet the provisions of Policy RSA22 d. iii. In relation to additional boundary planting.

Reasons: The changes are required to ensure Policy RSA22 is:

- 1 c) Effective i.e. inclusion of all of the land to which Policy RSA22 relates will ensure that development of the RSA22 site will be in accordance with the provisions of the Policy and is deliverable within the plan period.
- 2 d) Consistent with national policy i.e. the changes will ensure that Policy RSA22 is consistent with Paragraph 16 of the NPPF, specifically that it is aspirational but deliverable (b)) and is clearly written and unambiguous (d)), so that the area of land to which Policy RSA22 relates is evident to all parties.

Spatial representation of Policy RSA22 parameters

Proposed changes: The Indicative Map needs to be changed to indicate, by reference to the Legend, the location (and extent, as appropriate) of land to which the parameters of Policy RSA22 apply, in accordance with the proposed changes to the text of Policy RSA22 set out above and the Proposed Indicative Map at Appendix 6 of these representations.

The changes are:

- 1 i) Inclusion of two additional “access” symbols to indicate the proposed additional access points off Newbury Road and Lipscomb Close (Policy RSA22 b.).
- 2 ii) Re-positioning of the “walk and cycle link” symbol indicating the link to the RSA20 (Charlotte Close) allocation to indicate a link to Station Road (Policy RSA22 b.).

iii) Inclusion of a new “walk and cycle link” symbol to indicate an additional link via the disused track to Marlston Road/Eling Way (Policy RSA22 b.)

- 1 iv) Changes to the location and extent of the central open space (Policy RSA22 d. ii.).
- 2 v) Inclusion of a new “landscape buffer” symbol in the Legend and indicating as “landscape buffer” the additional planting along the south eastern boundary (Policy RSA22 d. iii.) and the set back from Station Road (Policy RSA22 d. iv.).

Reasons: The changes are required to ensure Policy RSA22 is:

b) Justified i.e. it is the most appropriate strategy for achieving a sustainable development of approximately 47 dwellings on the RSA22 site, taking into account reasonable alternatives, based on proportionate evidence.

	<p>1 c) Effective i.e. the changes ensure that development of the RSA22 site will be in accordance with the parameters of Policy RSA22 and is deliverable within the plan period.</p> <p>d) Consistent with national policy i.e. the changes will ensure that, taken together, Policy RSA22 and the Indicative Map are consistent with Paragraph 16 of the NPPF, in that they have been prepared with the objective of contributing to the achievement of sustainable development (a)); are aspirational but deliverable (b)); and are clearly written and unambiguous, such that the locations and areas of land to which the parameters of Policy RSA22 a., b. and d. relate are evident to all parties.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>The main issue raised in this representation is the importance of optimising the use of the RSA22 site for housing in circumstances where there is an existing and anticipated shortage of suitable housing land to meet the identified housing needs of the AONB spatial area.</p> <p>Paragraph 125 of the NPPF is unique in terms of national planning policy in that it requires this issue to <i>"be tested robustly at examination."</i> Since the issue has been raised on behalf of the joint site owners and they are uniquely placed to assist in a robust examination, it is especially important that they are allowed to participate in the oral stage of the examination.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1176
Chapter / Policy / Appendix Number	Policy RSA 22
Chapter / Policy / Appendix Title	Land adjacent Station Road, Hermitage
Order	126
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes</p>	Yes

* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	We note the proposed criterion: "A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets." This statement does not fully align with the HELAA site assessment. Assessment should also consider the site's relationship with a nearby Scheduled Monument (Grimsbury Castle) – a point that is not mentioned in the Sustainability Appraisal for the site. As a result, the wording of this requirement for heritage impact assessment will need to be amended, in discussion with the Council's heritage advisers. We suggest revised wording for consideration. Furthermore, we are unclear on the rationale for not undertaking a DBA and if needed field evaluation on this site, given the ridge and furrow system identified on the HER. To align with the NPPF, wording needs to be added on a requirement for archaeological assessment.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets and the nearby Scheduled Monument (Grimsbury Castle) The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary;
5. Independent Examination - If your representation is seeking a	No

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1849
Chapter / Policy / Appendix Number	Policy RSA 22
Chapter / Policy / Appendix Title	Land adjacent Station Road, Hermitage
Order	126
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A bedrock aquifer</p> <p>Developments connecting to Chieveley STW may be problematic as it discharges into The River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. Mitigation of additional load will need to be secured before any development can proceed.</p> <p>As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA22.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA20.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Truby, Jen
Consultee Full Name	Jen Truby
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS249
Chapter / Policy / Appendix Number	Policy RSA 23
Chapter / Policy / Appendix Title	Land adjoining The Haven, Kintbury (Site Ref: KIN6)
Order	128
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	24/02/2023 14:49:44
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	You should not be building on fields in an area of outstanding natural beauty.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>You should not be building on fields in an area of outstanding natural beauty.</p> <p>You should be looking for alternatives that involve redeveloping vacant sites elsewhere, not untouched land.</p> <p>The road you propose to join to off the haven is narrow and all houses on the haven park cars on the street. There is therefore only normally space for one lane of traffic, twenty more houses will exacerbate the traffic and parking issues. Children play on the street and we don't need more traffic on it!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>You are not cooperating at all. You dismiss objections from local people and seem to be doing nothing other than making things worse for existing residents on the haven and in Kintbury.</p>
<p>4. Proposed Changes</p>	<p>Do not build on this site at all.</p> <p>It is an undeveloped field in an area of outstanding natural beauty. I frequently see multiple types of deer, bats, birds of prey (including barn owls), frogs and toads. I hope the new survey is sufficient to put you off building here. I think it shouldn't be allowed whether you find newts or not though, simply on the basis of the other wildlife.</p> <p>I don't see any allocation in your plan to improve matters regarding traffic in the village, or infrastructure or facilities improvement.</p> <p>The access on the haven is inadequate for additional housing and for construction vehicles. This concern was completely dismissed in your original response to comments, but should be addressed. How can you expect to get construction vehicles up a narrow road that constantly has on street parked cars and children playing? What will you do to ensure building works don't impact nearby residents? I work from home, looking out over the field every day.</p> <p>You also have provided no provision to the detrimental affect this will have on current residents of the haven in the long term. We look out on fields, and our houses are not overlooked at present. Building here, on land that is higher than the haven, will impact our light levels and privacy.</p> <p>There are other alternative sites in the village with better access. The number of houses you are planning to build here is negligible compared to the rest of the plan. Go put them somewhere else.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	CPRE Berkshire
Consultee Full Name	CPRE Berkshire
Consultee Organisation	CPRE Berkshire
Agent Full Name	
Agent Organisation	
Comment ID	PS1051
Chapter / Policy / Appendix Number	Policy RSA 23
Chapter / Policy / Appendix Title	Land adjoining The Haven, Kintbury (Site Ref: KIN6)
Order	128
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:49:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>CPRE Berkshire has over 400 members and supporters</p> <p><i>Introduction:</i> The Campaign to Protect Rural England (CPRE, the countryside charity), Berkshire Branch welcomes the opportunity to comment on the Draft West Berkshire Local Plan. We would like to express our appreciation of the documentation that has been provided, in particular the clarity and accessibility of the supporting information.</p> <p><i>CPRE concerns:</i></p> <ol style="list-style-type: none"> 1. We remain concerned however about the introduction of further housing some of the land allocations and would the Council to provide more evidence concerning air quality impact both on the new areas for development and on nearby areas of important landscape and wildlife interest. 2. The main purpose of this response however is to express our great concern regarding the appearance of a major new site adjacent to the AONB, which is proposed to be allocated for mixed use settlement in North East Thatcham, (the Floral Way) which we believe is unnecessary, contrary to national planning policy and certain to cause disruption and unredeemable harm to what is currently an especially attractive and unspoilt rural area. 3. Similarly the land adjoining The Haven, Kintbury (Site Ref: KIN6) in which 20 dwellings are proposed, will cause overcrowding in an village area of AONB countryside, increase car fumes and cause traffic congestion in a small village location. The road network is already overcrowded with the exit and entrance used by neighbouring villages of Combe and Inkpen, which also serves the industrial estate located in Inkpen with overly large haulage vehicles. 4. The two areas above are part of the AONB/green field area. where landscape is “managed to conserve and enhance its natural beauty in accordance with its designation”. 5. CPRE believes that genuine housing needs in West Berkshire can more than adequately be met by regenerating brownfield (previously developed) land, rather than sacrificing countryside in and around the AONB or by swamping local villages with excessive development. There can be a significant reduction in the housing numbers currently imposed on West Berkshire as they are no longer binding but are merely ‘advisory’, due to a recent change of government policy announced by Housing Secretary, Michael Gove. West Berkshire has 53 brownfield sites totalling 46.54 hectares, which at a rough estimate would allow building of 2837 homes without the need to build on any farmland or countryside, and without damaging the impact on the rural environment, especially the AONB. 6. Many of WBC old list of 25 approved development sites have now been built on and it would be helpful if years of completion were given. <p><i>Additional comments:</i></p> <ol style="list-style-type: none"> 1. The draft plan proposes a large strategic development area NE of Thatcham now for 1500 dwellings to 2039, although part of a plan for some 2500 in the longer term. It would run uphill to the AONB and be a source of light pollution. This has brought strong opposition from Upper Bucklebury because of its landscape and traffic impacts. Given the recent statement by minister Gove that where there are significant impacts on the landscape Councils could reduce their housing numbers: WBC should pursue this and reduce the numbers of housing.. 2. There are sites along the A4 valley which would be better for housing rather than commercial use. One report mentioned developers proposal for some 170 homes in the Siege Cross/Colthrop area with a bridge crossing the railway and canal, something Thatcham badly needs, which we strongly support. Government funding should be available to implement this. 3. The uses of the area by the A329 into Newbury and along the A4 have been debated for a long time. It could be an appropriate brownfield area for mixed development with some small blocks of flats for local workers. 4. Proposals for a large distribution centre east of Thatcham was reported in Newbury News some months ago and supported by a councillor. An email of 2 Feb to WBC asking about its location received no reply. It would be bad environmentally with a lot of large lorries coming from A339 Newbury along the poor roads through Thatcham and through Aldermaston village. Policy SP8 recommends that larger distribution sites B8 should be near motorway junctions. Again, this would be a better site for some housing. <p><i>Conclusion:</i> CPRE Berkshire believe that the two specific sites mentioned above, included in the draft Local Plan, are significantly damaging to the countryside; are unsustainable due to poor infrastructure; and cause unnecessary destruction of the landscape and green fields.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1007
Chapter / Policy / Appendix Number	Policy RSA 23
Chapter / Policy / Appendix Title	Land adjoining The Haven, Kintbury (Site Ref: KIN6)
Order	128
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p>

	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Adcock, Barry</p>
<p>Consultee Full Name</p>	<p>Barry Adcock</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	<p>Barry Adcock</p>
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS750</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy RSA 23</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Land adjoining The Haven, Kintbury (Site Ref: KIN6)</p>

Order	128
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:11:00
Attached Files	Barry Adcock attachment.png
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Originally two areas in Kintbury were considered as possible developable sites KIN6 and KIN3, see the enclosed map, with KIN3 as the preferred area for a small developable part for about 20 houses. The change proposed in the Local Plan Submission from KIN3 to KIN6 as the preferred site is wrong for the following reasons: All construction traffic will of necessity access the KIN6 site via a residential area where there is considerable on road car parking. This would not be the case if KIN3 is adopted as the preferred site. If KIN6 is adopted, construction traffic will pass through the centre of Kintbury village via the cross road in the village centre enroute to the A4 and Holt road to Newbury and beyond. This would not be the case for the KIN3 site.

	<p>KIN 6 site is adjacent to the sports ground and so will suffer from noise and light pollution when football matches are being played after dark.</p> <p>There will be a loss of garages in the KIN6 site to enable access to the site. This is not the case for KIN3. The KIN3 site can be as large or small as the requirement for housing changes, the site dimensions will easily accommodate 100 units or alternatively a solar array to ensure a greener construction. The main grid transmission line runs 100mtrs from the KIN3 site on the same landowners property.</p> <p>Access to the doctors surgery, the local school and the train station is also marginally better from the KIN3 site.</p> <p>Buses pass the KIN3 site daily. (see attachment)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please find document attached.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Environment Agency</p>
<p>Consultee Full Name</p>	<p>Judith Montford</p>
<p>Consultee Organisation</p>	<p>Environment Agency</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1850</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy RSA 23</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Land adjoining The Haven, Kintbury (Site Ref: KIN6)</p>
<p>Order</p>	<p>128</p>
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	<p>E-Mail</p>

* Unknown	
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>The site is on SPZ3, secondary A and principal bedrock aquifers</p> <p>This site would require a Flood Risk Assessment which demonstrates requirements of NPPF and PPG. This is due to its size (greater than 1 hectare. WBDC Confirm?). This requirement should be included in the list of requirements for assessing and developing the site.</p> <p>Kintbury STW is a high spilling site, so actions to address this are required.</p> <p>Development will lead to a deterioration in Phosphorous so a new and tighter permit will be required to prevent this from happening. Mitigation of additional load will need to be secured before any development can proceed. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA23.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1741
Chapter / Policy / Appendix Number	Policy RSA 23
Chapter / Policy / Appendix Title	Land adjoining The Haven, Kintbury (Site Ref: KIN6)
Order	128
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	<p>Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>EXECUTIVE SUMMARY</p> <p>Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. Boyer have prepared these representations on behalf of Sovereign, in response to the 'Regulation 19' consultation relating to the Proposed Submission West Berkshire Local Plan Review (2022 – 2039).</p> <p>The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness. To this end, general support is provided to the spatial strategy set out in the West Berkshire Local Plan Review (2022 – 2039), to the Council's conduct of the plan-making process in relation to the Duty-to-Cooperate, and specifically for the allocation of Land Adjoining The Haven, Kintbury, for residential development.</p> <p>The Proposed Submission West Berkshire Local Plan (2022 – 2039) ('emerging local plan') proposes to allocate a series of sites to, as a minimum, meet the identified housing needs within the district. Despite the constrained nature of the district, the plan identifies a robust selection of sites that are capable of delivering residential development appropriate to accommodate sustainable growth to meet the minimum local housing need of the area.</p> <p>Sovereign supports this approach, recognising that the Council's commitment to accommodate the identified minimum Local Housing Need ('LHN') figure within the district is paramount.</p> <p>The Council's identification of sufficient developable land to deliver approximately 5% additional homes above the minimum identified need is also supported. Sovereign considers that this 5% 'headroom' provides for a flexible and robust quantum of housing supply to fully ensure that the identified housing needs of the district are met.</p> <p>Furthermore, the identified headroom in the housing supply could usefully accommodate a proportion of the unmet need that is likely to arise from Reading, as part of the Western Berkshire Housing Market Area ('HMA'). Sovereign supports the Council in seeking to accommodate a reasonable proportion of this unmet need and recommends that the Council seek to maximise the delivery of new homes on the</p>

proposed site allocations to assist in delivering this aim. Such an approach would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing, ensuring minimum housing needs are met.

In seeking to deliver the amount of new homes required in the district, the Council have identified an appropriate spatial strategy. The emerging local plan recognises that there is limited further growth potential at the district's most sustainable settlements; namely, Newbury and Thatcham, alongside the Eastern Urban Area, whilst maximising the available land within the relevant site allocations. Sovereign supports the Council's identification of a spatial strategy which directs development to available land within the next most sustainable locations as appropriate, in accordance with the settlement hierarchy.

The otherwise relatively unconstrained nature of the North Wessex Downs Area of Outstanding Natural Beauty ('AONB'), in combination with the presence of a series of sustainable medium and smaller-sized Service Villages, provides that the North Wessex Downs AONB Spatial Area (as identified in proposed Policy SP1) remains appropriate to accommodate a reasonable proportion of the district's identified housing needs.

To maintain the longer-term vitality of the district's Service Villages, such as Kintbury, it is imperative that the Council supports the sustainable growth of these areas, supporting the viability of local services and amenities, alongside delivering much-needed affordable housing in rural areas. To this end, Sovereign supports the identification of specific site allocations within these villages, which provide opportunities for modest sustainable growth whilst conserving and enhancing the special landscape qualities of the AONB.

Sovereign therefore supports the identification of Land Adjoining The Haven, Kintbury ('the site') as being suitable for allocation within the emerging local plan, through proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'. Kintbury comprises a relatively unconstrained settlement that can accommodate sustainable growth during the plan period. The site is well-positioned to make a reasonable contribution to meeting the district's development needs.

The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities provided in the village, benefitting from good access to nearby main settlements including Newbury (by bus and rail), Reading, and London Paddington (by rail). There are not considered to be any significant constraints to the development of the site, which could provide at the very least a minimum of 20 high-quality new homes.

Sovereign is able to confirm that the site is available for development now, offers a suitable location for residential development, and is achievable with a realistic prospect that housing can be delivered on-site within the first five years of the proposed plan period. Consequently, the site should be considered favourably in relation to planning practice guidance and its proposed allocation within the emerging West Berkshire Local Plan is supported.

Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant and is capable of being found Sound following independent Examination. Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.

INTRODUCTION

Context

Boyer has been appointed by Sovereign Housing Association ('Sovereign'), to act on their behalf in respect of the ongoing promotion of the Land adjoining The Haven, Kintbury, for residential development. The Site Location Plan is provided at Appendix 1: Site Location Plan.

Sovereign holds a specific land interest within West Berkshire, known as Land adjoining The Haven, Kintbury ('the site'). These representations are aligned with this land interest and address topics within the West Berkshire Local Plan Review consultation, and its supporting evidence base, accordingly.

The site has been assessed by West Berkshire District Council ('the Council') within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. Furthermore, the site is proposed for allocation within the Local Plan Review document, to accommodate residential development, under proposed Policies SP15: 'Sites allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.

The purpose of these representations is to assist the Council in formulating and refining an approach that is both consistent with national planning policy and the tests of soundness, as set out at paragraph 35 of the NPPF; namely, whether the emerging West Berkshire Local Plan (2022 – 2039) is:

- a) Positively prepared – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs.
- b) Justified – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence.
- c) Effective – deliverable over the plan period and based on effective joint working.
- d) Consistent with national policy – enabling the delivery of sustainable development.

At this stage of the plan-making process, it is essential that West Berkshire District Council ('the Council') continues to pursue an approach that is consistent with national policy, effective, justified, and positively prepared. These representations comprise our recommendations to assist the Council in achieving such an approach, as emerging plan progresses toward adoption.

These representations build upon and should be considered in conjunction with the previous representations submitted by Sovereign to the 'Regulation 18' consultation on the West Berkshire Local Plan Review 2020 – 2037: Emerging Draft (December 2020), which ran from 11 December 2020 to 5 February 2021.

Policy Context

The Council adopted the Core Strategy Development Plan Document (2006 - 2026) in July 2012. Five years later, the Council then adopted the Housing Site Allocations Development Plan Document in May 2017, to implement the spatial framework set out within the Core Strategy. The adopted Development Plan for the district therefore sets out the spatial strategy to meet development needs up to 2026 and provides a series of site allocations and planning policies that seek to deliver that strategy.

To ensure that planning policies remain relevant and are able to effectively meet the needs of the local community, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date.

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039), which is the subject of the 'Regulation 19' consultation, reflects the distilled outcome of that review process. The draft plan sets out an updated vision and strategy, alongside an updated series of site allocations and policies that would supersede the adopted Core Strategy upon its adoption, which is anticipated in 2024.

Sovereign **supports** the Council's commitment to review the existing development plan through this process.

Land adjoining The Haven, Kintbury ('the site')

Land adjoining The Haven, Kintbury, comprises approximately 1.5 hectares of land toward the south-western extent of Kintbury village. The site lies to the rear of existing residential properties, which front onto the road known as 'The Haven'. The site currently comprises an undeveloped open field, bordered by dense hedgerows with intermittent tree cover.

To the north of the site lies the Kintbury Rangers Football Club, which includes a range of sports facilities alongside the Jubilee Centre, a community sports building. Beyond the well- vegetated site boundaries to the south and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.

West Berkshire District Council assessed the site within the district's Housing and Economic Land Availability Assessment ('HELAA') [Footnote 1: Available online at: <https://westberks.gov.uk/helaa>], under Site Reference: KIN6. The HELAA, which was first published in February 2020 and subsequently updated (most recently in January 2023), concluded that the site was potentially available, potentially suitable, and achievable for residential development within the proposed emerging plan period.

Sovereign supports the conclusion that residential development would be achievable on the site within the emerging plan period. However, Sovereign considers that the site is also immediately available for development and is suitable for residential development within the proposed emerging plan period in relation to the provisions set out in Planning Practice Guidance². Further detail is provided in Section 6 of these representations in relation to the availability, suitability, and achievability of the site for residential development.

As section 5 of these representations illuminates, the site benefits from being sustainably located and there are not considered to be any significant constraints to the development of the site for residential dwellings within the emerging plan period. The development of the site is considered to be achievable whilst conserving and enhancing the special qualities of the AONB, in accordance with proposed Policy SP2: North Wessex Downs AONB.

The development of the site for a minimum of 20 new homes would contribute toward meeting the district's significant identified housing need in a sustainable location, in addition to providing a range of further benefits; including much-needed affordable housing, biodiversity improvements, and financial contributions toward the maintenance of local infrastructure.

Development at this scale is considered to represent an efficient use of the land, whilst respecting the character and setting of the wider landscape in which the site is set. As such, the allocation of the site for a minimum of 20 dwellings, which provides scope for additional dwellings to be provided above the identified quantum, would accord with Paragraph 124 of the NPPF, in which it is made clear that 'planning policies and decisions should support development that makes efficient use of land'.

Consequently, Sovereign supports the proposed allocation of the site for residential development in the emerging local plan. Furthermore, Sovereign considers that, with sensitive design, the site could accommodate a higher number of new homes, that would go towards meeting the district's identified housing needs. As such, Sovereign recommends that the proposed allocation is amended to reflect this approximate capacity to reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district.

THE SCALE OF HOUSING NEED

In providing sufficient capacity within the headroom of supply in West Berkshire, Sovereign recommends that the Council seeks to maximise the development potential of the sites proposed to be allocated for residential development within the plan.

To this end, Sovereign recommends that the identified approximate capacity within proposed Policy RSA23: 'Land Adjoining The Haven, Kintbury' be revised to approximately 35 dwellings. As set out in Section 6 of these representations, the site is considered to be capable of delivering this quantum of development whilst being sensitively designed to conserve and enhance the special landscape character of the AONB.

DEVELOPMENT MANAGEMENT POLICIES

The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been

included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.

Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.

As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.

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

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

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

LAND ADJOINING THE HAVEN, KINTBURY

The Site

Land adjoining The Haven, Kintbury ('the site'), comprises approximately 1.5 hectares of land toward the south-western extent of Kintbury village. A Site Location Plan is provided at **Appendix 1: Site Location Plan** [see attachment 'Boyer obo Sovereign_Full Rep'].

The site currently comprises an undeveloped open field, bordered by dense hedgerows with intermittent tree cover. Immediately to the north of the site lies Kintbury Rangers Football Club, which is further abutted by a range of sports facilities (including three tennis courts, a bowling green, and a skatepark), alongside the Jubilee Centre, a community sports building.

Beyond the well-vegetated site boundaries to the south and west lie undeveloped fields within the North Wessex Downs AONB. The site lies entirely within Flood Zone 1 (low flood risk) and has no relevant planning history.

The site is within a reasonably sustainable location, approximately 365 metres from Kintbury High Street, which represents a short 4-minute walk or 1-minute cycle from the proposed site access to The Haven. Several services are provided within Kintbury village, including:

- Kintbury St Mary's Primary School (420 metres);
- Local convenience stores, including an independent butcher and a Post Office (380 metres);
- Two Public Houses (460 and 710 metres);
- The Jubilee Centre, Kintbury Tennis Club, Kintbury Bowls Club and Kintbury Skatepark (150 metres);
- Kintbury Village Green (225 metres);
- Allotments (400 metres);
- Kintbury Village Hall (110 metres); and
- Kintbury Rail Station (800 metres).

Development of site has the potential to deliver a range of benefits including:

- Approximately 35 high quality new homes, with a wide mix of housing sizes, types, and tenures, including much needed affordable housing;
- Appropriate retention of existing trees and hedgerows, enhanced by additional planting and habitat creation to settle the development in the landscape and provide biodiversity net gains;
- A high-quality development of homes designed to minimise resource use and carbon emissions, which is resilient to the effects of climate change; and
- Developer contributions towards the provision of new and improved local infrastructure, potentially including improvements to the local transport network, maintenance of local sports facilities, and/or other benefits as appropriate.

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

Deliverability of the Proposed Development

West Berkshire District Council assessed the site within the district's Housing and Economic Land Availability Assessment ('HELAA') (2023), under Site Reference: KIN6. The HELAA concluded that the site was *potentially available*, *potentially suitable*, and *achievable* for residential development within the proposed emerging plan period.

Sovereign **supports** the conclusion that residential development would be *achievable* on the site within the emerging plan period. However, Sovereign considers that the site is also immediately *available* for development and is *suitable* for residential development within the proposed emerging plan period in relation to the provisions set out in Planning Practice Guidance.

Furthermore, the submission of any forthcoming planning application for the development of the site would be supported by a series of appropriate technical reports, which would demonstrate the proposal's

compliance with all relevant planning policies and demonstrate that suitable mitigation of any potential adverse impacts of the development has been incorporated as appropriate.

Availability

Sovereign is able to confirm that the site is immediately available for residential development. Although the land is currently within multiple landownerships, Sovereign benefits from an option over the entire extent of the site. Furthermore, there are no known legal restrictions to the development of the site for the proposed use.

Consequently, the site is considered to be *available* for residential development within the plan period, in accordance with PPG.

Suitability

In accordance with PPG, a site can be considered to be *suitable* if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Sovereign considers that there are no absolute constraints to the development of this site within the proposed plan period.

The Council's HELAA (2023) undertook an assessment of the suitability of the site in relation to a range of potential environmental and policy-based constraints. The assessment determined that the site is *potentially suitable*, based on the requirement for further information to determine the site's potential impacts and the extent of the developable area.

In relation to potential constraints to the development of the site, the HELAA identifies that the Council's Highways Team retained concerns over the potential impact of the development on Local Highway Capacity, in particular on the High Street, should the proposal comprise more than 22 dwellings.

However, given the sustainable location of the site, less than a 5-minute walk from the services located at the High Street, it is considered that the proposal would be unlikely to result in significant adverse impacts to Local Highway Capacity.

Sovereign is committed to ensuring that the development of the site is acceptable in relation to transport impacts. Accordingly, a Transport Note is provided at Appendix 2 in support of these representations.

As identified within the Transport Note, the proposed development of 35 new dwellings in this location will not give rise to any significant impacts on the operation of the transport network. Further, the Note demonstrates that all of the land necessary to provide access to the Site and the necessary visibility splays at local junctions is within the ownership of Sovereign or is Highways Land and is accordingly deliverable.

As part of any future planning application, a Transport Statement will be prepared and submitted to further assess the impacts of the proposed development and any suitable mitigation required. However, at this stage it is considered that robust evidence has been provided to demonstrate that there are no highways constraints, which would prevent the development of this Site.

Furthermore, in relation to the site's location within the North Wessex Downs AONB, the Council's Landscape Sensitivity Assessment (2011), in which the site was assessed under reference KIN011, concluded that development on the whole site would be acceptable subject to certain recommendations:

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

Sovereign is committed to ensuring that residential development at the site is accommodated without harm to the natural beauty of the AONB. Sovereign is therefore committed to preparing a detailed Landscape and Visual Impact Assessment to inform the detailed design of the development proposal, to ensure that potential impacts are sufficiently mitigated and/or screened as appropriate.

Consequently, the potential concerns relating to the *suitability* of the site are not considered to represent absolute constraints to development and can be appropriately overcome. Sovereign considers that the site is therefore *suitable* for development in relation to the provisions set out in Planning Practice Guidance [Footnote 16: PPG: Housing and economic land availability assessment. Paragraph: 018 Reference ID: 3- 018-20190722].

Achievability

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

Deliverability

As set out above, the site is *available* for development now, is in a *suitable* location for residential development, and is *achievable* for development in the early part of the proposed plan period. Consequently, the site is considered to be *deliverable* in relation to the provisions set out in Planning Practice Guidance.

Sovereign therefore **supports** the proposed allocation of the site for residential development within the Proposed Submission West Berkshire Local Plan Review (2022 – 2039) through Policies SP15: 'Sites

allocated for residential development in North Wessex Downs AONB' and RSA23: 'Land adjoining The Haven, Kintbury'.

Furthermore, in accordance with the discussion set out within these representations, Sovereign **recommends** that the proposed approximate capacity for residential development identified within the allocation is increased to approximately 35 dwellings, to reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district in accordance with the NPPF.

Revision of the approximate capacity of new homes that could be accommodated on the site is considered to be necessary to ensure that the emerging local plan is *positively prepared* and *effective* in meeting the identified housing needs for the district and in assisting with meeting unmet need arising from outside of West Berkshire.

CONCLUSION

The Proposed Submission West Berkshire Local Plan Review (2022 – 2039) sets out how West Berkshire District Council proposes to, as a minimum, meet identified development needs within the district area. The proposed spatial strategy seeks to direct development toward the most sustainable locations within the district, whilst recognising the vital role that modest growth provides to support medium and smaller-sized villages within the North Wessex Downs Area of Outstanding Natural Beauty.

Sovereign supports the Council's commitment to meeting housing needs in full and supports the Council's identification of a reasonable amount of headroom in the district's housing supply to ensure that local housing needs are met during the plan period.

However, Sovereign recommends that the Council seeks opportunities to maximise the development capacity of appropriate sites to ensure that the identified headroom is as robust as is reasonably practicable. Land adjoining The Haven, Kintbury, which is proposed to be allocated for the development of approximately 20 new homes under emerging Policy RSA23, presents such an opportunity. Sovereign considers that the approximate capacity allocated for the site could be higher, without detriment to the amenity of adjoining residents, with sufficient scrutiny to the design of the scheme and in considering greater benefits to the wider community. The provision of additional capacity could reflect the full potential of the proposed allocation and ensure the efficient use of development land within the district.

Furthermore, Sovereign supports the proposed spatial strategy, which includes a modest amount of residential development within the North Wessex Downs AONB Spatial Area. The approach maintains the existing spatial strategy within the district and would support housing delivery in the wider region in accordance with the Government's commitment to significantly boost the supply of housing. The proposed allocations have also been evidenced and justified through detailed analysis to ensure the high value of the AONB and any potential impacts are carefully considered.

Otherwise relatively unconstrained, the nature of the district's North Wessex Downs AONB Spatial Area, which includes the presence of a series of sustainable, small and mediumsized villages, provides that the area remains appropriate to accommodate a reasonable proportion of the district's identified housing need. Furthermore, to support the longer-term viability of these villages, it is critical that the Council supports opportunities to provide modest growth in appropriate locations.

To this end, Sovereign supports the proposed allocation of Land adjoining The Haven, Kintbury, for residential development under emerging Policies SP15 and RSA23. Kintbury comprises a relatively unconstrained settlement that could accommodate a reasonable level of growth during the proposed plan period. Land adjoining The Haven is well-positioned to make a reasonable contribution to meeting the district's development needs in this location.

The site is in a sustainable location, within practical walking and cycling distance of the range of services and facilities within Kintbury. Furthermore, the site benefits from good access to nearby main settlement areas via bus and rail links, including Newbury and Reading. There are no significant constraints to the development of the site for approximately 35 new homes which could not be resolved through detailed, sensitive design consideration.

Sovereign is able to confirm that the site is available for development now, represents a suitable location for development, and that development of the site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The site is deliverable and should continue to be favourably regarded in relation to allocation for residential development within the emerging West Berkshire Local Plan.

We look forward to continuing to work with West Berkshire District Council, Kintbury Parish Council, and the wider community to provide much-needed new housing in this rural community. We also look forward to exploring how the Land adjoining The Haven, Kintbury can contribute to the delivery of sustainable development and benefit the village, local infrastructure, and facilities.

See attached document for a full response <Boyer obo Sovereign_full rep>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
* Yes
* No

Yes

Please give reasons for your answer

Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.

3. The Duty-to-Cooperate

Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage

	<p>constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
4. Proposed Changes	As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1008
Chapter / Policy / Appendix Number	Policy RSA 24
Chapter / Policy / Appendix Title	
Order	131
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wokingham Borough Council
Consultee Full Name	Wokingham Borough Council
Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1489
Chapter / Policy / Appendix Number	Policy RSA 24
Chapter / Policy / Appendix Title	
Order	131
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comments
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	Yes

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Policy RSA24 proposes to allocate an additional 8 permanent pitches at an existing private site at Paices Hill within an area of land currently comprising transit pitches. This allocation is carried forward from the existing adopted plan. The site has now obtained planning permission for a change of use from 8 transit caravan pitches to 8 permanent Gypsy / Traveller pitches. It is noted that the site is located within the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston where new residential developments would not usually be acceptable. However, in this particular instance, it was considered that having permanent pitches on site would be an improvement to the existing transit provision as the former would be expected to provide day rooms with more secure accommodation than touring caravans in the event of an emergency. WBC supports the allocation which will make a contribution towards identified need.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	No comments
<p>4. Proposed Changes</p>	N/A
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1851
Chapter / Policy / Appendix Number	Policy RSA 24
Chapter / Policy / Appendix Title	
Order	131
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>Historic landfill site adjacent (Cross Lane Gully), drinking water protection, SPZ3, secondary A bedrock aquifer</p> <p>There is a historic landfill historic landfill next to site which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance Which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p>It is not clear to us that this site would connect to a STW as it is quite far from any Thames Water sewers. Therefore, any wastewater drainage proposal for this site must be clearly stated as well as all mitigation measures proposed to ensure wastewater disposal from the development will not have a negative impact on sensitive receptors. These should be secured before any development can proceed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS1009
Chapter / Policy / Appendix Number	Policy RSA 25
Chapter / Policy / Appendix Title	Long Copse Farm, Enborne (Site Ref: TS2)
Order	133
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Zippos Circus (Represented by RPS Group)
Consultee Full Name	Guy Bailey
Consultee Organisation	RPS
Agent Full Name	Guy Bailey
Agent Organisation	
Comment ID	PS297
Chapter / Policy / Appendix Number	Policy RSA 25
Chapter / Policy / Appendix Title	Long Copse Farm, Enborne (Site Ref: TS2)
Order	133
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 09:33:13
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	<i>It will provide for the needs of travelling showpersons over the plan period.</i>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	Yes

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<i>It will provide for the needs of travelling showpeople over the Plan period.</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<i>No changes are necessary</i>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1194
Chapter / Policy / Appendix Number	Policy RSA 25
Chapter / Policy / Appendix Title	Long Copse Farm, Enborne (Site Ref: TS2)
Order	133
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We are unclear if the potential impact on the setting of the 33 and 34, Church Lane (GII) has been considered. Notwithstanding the fact this is the continuation of an adopted policy, suitable mitigation may be needed along the western edge of the site, informed by heritage assessment. We suggest wording for consideration.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<u>Development will be informed by a Heritage Impact Assessment (HIA) to minimise any harm to the setting of 33 and 34 Church Lane</u>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Woodland Trust
Consultee Full Name	Ms Bridget Fox
Consultee Organisation	The Woodland Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS860
Chapter / Policy / Appendix Number	Policy RSA 25
Chapter / Policy / Appendix Title	Long Copse Farm, Enborne (Site Ref: TS2)
Order	133
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 00:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The policy provides protection for ancient woodland in line with the NPPF.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	The NPPF requires protection for ancient woodland. This site is adjacent to ancient woodland, Long Copse (SU44036489) ASNW 4.71 Ha. We support the policy wording <i>e. Provide an appropriate buffer of at least 15m between the development and the Ancient Woodland at Long Copse Wood., The precise buffer will be determined through detailed assessment and design when proposals are submitted for development. A 10m woodland buffer along the northern and western boundaries of the site to link to Long Copse Wood and tree planting along the southern boundary of the site should also be provided. These must be in place before the occupation of the site;</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	Yes

* Yes * No	
Please give reasons for your answer	n/a
4. Proposed Changes	n/a
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	n/a
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1573
Chapter / Policy / Appendix Number	Policy RSA 25
Chapter / Policy / Appendix Title	Long Copse Farm, Enborne (Site Ref: TS2)
Order	133
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>Point 'k' states "No caravans will be permitted within Flood Zones 2 and 3 at the northern edge of the site". While we support this as caravans are classed as 'highly vulnerable' under NPPF, there is no Flood zone 2/3 within the site (as per the red line boundary on page 137). Can this be confirmed?</p> <p>It is not clear to us that this site would connect to a STW as it is quite far from any Thames Water sewers. Therefore, any wastewater drainage proposal for this site must be clearly stated as well as all mitigation measures proposed to ensure wastewater disposal from the development will not have a negative impact on sensitive receptors. These should be secured before any development can proceed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The</p>	

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy ESA 1 Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS966
Chapter / Policy / Appendix Number	Policy ESA 1
Chapter / Policy / Appendix Title	Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)
Order	136
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website

<https://developers.thameswater.co.uk/>

[Developing-a-large-site/Planning-your-development](https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development).

Waste Response

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

	<p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	Historic England
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1799
<p>Chapter / Policy / Appendix Number</p>	Policy ESA 1
<p>Chapter / Policy / Appendix Title</p>	Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)
<p>Order</p>	136
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
<p>Response Date</p>	03/03/2023 11:13:00
<p>Attached Files</p>	
<p>1. Do you consider the Local Plan Review is legally compliant?</p>	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness. Linked with this matter: a) for ESA1, the phrasing implies that field evaluation will definitely be required; is that the case?
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1852
Chapter / Policy / Appendix Number	Policy ESA 1
Chapter / Policy / Appendix Title	Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)
Order	136
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an	

<p>appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>This site is on SPZ3, secondary A superficial aquifer</p> <p>We would not support any additional flows entering the Newbury STW - a known high spiller until significant work has been done to tackle the causes of the frequent spills. As stated in our suggested amendments and notes on Policy DM7, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site ESA1. (Please take notes of the details provided under RSA1 regarding wastewater discharge constraints).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review

- * Yes
- * No

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kristensen, Lorna
Consultee Full Name	Lorna Kristensen
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS451
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 10:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to file my complete OBJECTION to the continued expansion of industry at Membury.</p> <p>I write in the hope that you will listen to the RESIDENTS who live in this AREA. However, it is obvious, that so far, nothing we say has any impact.</p> <p>TRAFFIC. The B4000 is inadequate to handle the huge amount of enormous lorries intended if this planning is allowed. There has already been an HGV smashed into the side of a cottage. The road is deteriorating by the day with potholes. The road is too small on some bends for 2 HGVs to pass. These lorries go through the villages as 60/70mph and there are no speed restrictions they adhere to. Would someone please explain to us why they are banned through Wickham B4000 and not through Lambourn Woodlands.</p> <p>These lorries not only abuse the B4000 but also the small lanes behind Membury where they cut through and get stuck around the bends. There must be a full enquiry by the Highway department delivered personally, to all the residents affected by this development.</p> <p>EMPLOYMENT This unsustainable development in an ANOB has no travel plans. There are not enough local employees to work here so they will be coming from outside areas. There is no travel plan buses etc. to facilitate their journeys.</p> <p>There is NO ENVIRONMENTAL IMPACT ASSESSMENT FOR MEMBURY in ANOB AREA.</p> <p>There is no cumulative impact assessment for Membury and all development is impacting on the Critical Infrastructure i.e. power cuts, water shortage etc.</p> <p>WBC HAS A POLLUTION AND CARBON footprint Policy which has not been adhered to with regard to planning at Membury. This causes noise impact [from small planes for example) and air quality. The M4 has been shut down AT Least twice due to chemical releases from Rutpen and we have been told to stay in our houses for our safety.</p> <p>The size and scale of developments are totally against anything in an ANOB AREA. The government is adamant these areas should be protected especially ancient woodland and pollution of chalk streams. It seems the WBC has no worry about industrial spread onto agricultural land. There has been no risk assessment for flooding.</p> <p>THE STANTEC REPORT states that there is NO evidence base for further Industrial expansion at Membury. Therefore there is no justification for further development on this site. (Esa2 and 3)</p> <p>It is required in NEWBURY AND READING where of course there are many people available to employ. The economic arguments do not outweigh the environmental impact these massive industrial developments are having on this landscape.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Taylor, Steve
Consultee Full Name	Steve Taylor
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS373
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	26/02/2023 09:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I have been appalled by the continued push to expand the Membury site despite the complete lack of transport infrastructure. It seems the that the only agenda West Berks Council have is to plough on with industrialisation regardless of the irreparable damage done to the local area of Outstanding National Beauty. My home is on the B4000 the traffic on which has increased immeasurably in the 35 years my wife and family have lived there. We are woken through the night at ever-increasing intervals - my wife is seriously ill - and this is only set to get even worse. This is a minor road by its very name that is taking major heavy goods traffic and is already crumbling.</p> <p>I honestly believe that West Berks Council are completely blind to the damage that is being done to the health of people who have no wish other than to lead a peaceful life, let alone the havoc caused to the environment and countryside. The council only need to see a developer brandishing a debit card with a promise of employment that benefits people from outside this area to simply roll out the welcome mat no matter the consequences.</p> <p>The Membury development plans are unsustainable if local welfare is given the most minimal consideration, plus the risk of localised flooding, all this without even considering the pollution and carbon footprint. However the council appears keen to implement virtually everything that is put before them concerning Membury until it doesn't suit their purpose.</p> <p>Good alone knows what the light pollution and carbon pullution will do to the local wildlife. Developers care not one jot, they simply wish to boost their wealth no matter what the cost, aided and abetted by the council planners. No heed is paid to the water run off that will pollute ancient chalk streams and poison the aquifer.</p> <p>It would appear that the Stantec Report is quite clear that development is needed in Newbury and Reading but not here.</p> <p>That you have allowed the despised Walker Development to proceed shames you all. It is this department which is overseeing the demise of an area of a ONB. I have zero faith or confidence in West Berkshire Planning to stop this destruction which will see the local infrastructure gradually crumble until complete decay renders it totally unfit for any purpose.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Walker Logistics Ltd (Represented by Pegasus Planning Group Ltd)
Consultee Full Name	Philip Walker
Consultee Organisation	Walker Logistics Ltd
Agent Full Name	Jim Tarzey
Agent Organisation	Pegasus Planning Group Ltd
Comment ID	PS413
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 12:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Draft Policy ESA2 sets out the requirements for delivering employment floorspace on the allocated site. As explained above, outline planning permission (Ref. 19/02979/OUTMAJ) was granted in May 2021. The applicant has since submitted the RMA (Ref. 22/00897/RESMAJ), which was granted on 14 February 2023, and multiple applications seeking to discharge the pre-commencement conditions attached to Ref. 19/02979/OUTMAJ. Significant effort and cost have been exerted in seeking to realise this planning permission and a lawful commencement of development works on site will take place as soon as possible (2023/2024).</p> <p>Given the applicant's intention to deliver the outline planning permission, and subsequent RMA, we have no comment to make on the wording of Draft Policy ESA2 as we do not envisage a further planning application being required.</p> <p>However, it is crucial that the boundary of the site allocation is extended (for industrial, storage and distribution uses). This would make a significant contribution to helping WBC meet the identified need for industrial floorspace in West Berkshire. The whole site is owned by Walkers, it is in a suitable and sustainable location for development and is therefore a viable option that can be delivered in the short-term (years 1-5). One of the primary purposes of the Local Plan is to consider the future growth aims of the District and to allocate land for development that is not currently committed.</p> <p>It is recognised that the site is within AONB. However, the site is well-contained by existing (and emerging) buildings and the site includes a former runway which comprises concrete/hardstanding, the visual amenity of which is not of benefit to the AONB. It is crucial that the AONB designation does not constrain development which would otherwise result in significant economic benefits. Indeed, this was recognised by WBC through the granting of Ref. 19/02979/OUTMAJ.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Anderson, Alexander
Consultee Full Name	Alexander Anderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS536
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:34:05
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	I have said yes here as i do not feel (having no legal background) able to comment otherwise.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	No

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am particularly concerned that no Environmental Impact Assessment has been carried out on the Membury Industrial site which has expanded hugely, especially over the previous eight years. This has led to an intolerable increase in the traffic on this rural road network which affords no regard for the residents who live here. There is no public transport in the area, which along with a complete lack of cycle lanes, means that the impact on the traffic on the network is beyond its capacity. These roads are dangerous and further development will only increase this danger.</p> <p>The economic arguments for increasing the industrial development at Membury do not outweigh the environmental impact on the local environment. This is an ANOB, yet that does seem to be taken into consideration when driving the industrial development on. This is in direct contradiction to DC32 points i, ii and viii</p> <p>Indeed it seems to go against the Government's desire to protect these areas leading to the rural character of this area being destroyed. See DC35 section h:</p> <p>It would not generate traffic of a type or amount inappropriate for the rural roads, byways or restricted byways affected by the proposal or require improvements to these roads.... which could be detrimental to their character.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>25). Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).</p> <p>This has been taken from the accompanying documents to the plan in order to justify my comments in this section.</p> <p>I would suggest that the local community and local nature partnerships have not been consulted with reference to the industrial development at Membury.</p> <p>Also as stated in Policy ESA3 section h:</p> <p>Development will be informed by a Flood Risk Assessment, which will include flood mitigation measures including SuDS.</p>
<p>4. Proposed Changes</p>	<p>A full Environmental Impact Assessment needs to be carried out on the whole of the Membury Industrial Site before further development, which expands onto the ANOB, is allowed. This whole area has been subject to piecemeal development over which no-one has an overview of the true impact. The effect on this ANOB is devastating and must be reviewed properly.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	<p>Yes</p>

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bridle, Steve and Jennie
Consultee Full Name	Mr Steve and Jennie Bridle
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS710
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As residents of Lambourn Woodlands, we would like to ensure our comments are recognised and incorporated into the local plan regarding the Membury Industrial area.</p> <p>We urge the plan to Stop further development at Membury for the following reasons.</p> <p>Having lived next to the notorious Membury crossroads for over 25 years, we wanted to highlight the ever-increasing numbers of HGVs using the road and the negative impact on the quality of life for residents. Ermin Street (The primary road access to Membury), originally a narrow country lane, widened to aid the construction of the M4 in the late '60s. It was never designed for the current traffic levels and, in places, is barely wide enough for 2 HGVs to pass. There are numerous sharp bends; adverse cambers and long straights encourage speed and overtaking, which is extremely dangerous on most of the road and hazardous in certain sections. As an unnaturally widened road, most of the properties that front onto the road are very close to the road, making life next to the road increasingly unpleasant, noisy and dangerous. We can vouch for this when pulling into or out of our driveway, having had numerous near misses. Recently a local property was narrowly missed when an out-of-control HGV crashed through its garden wall; the same property was also hit in a separate incident only days earlier. The reality of living on Ermin Street, the main road leading to Membury!</p> <p>We object to further expansion to the Membury industrial area as this is leading to unsustainable traffic and HGVs on Ermin Street. This also highlights the danger of the Membury crossroads junction, the main route into the already over-expanded Membury. There have been many crashes on Membury crossroads in recent months, and it's only a matter of time before fatalities occur.</p> <p>There is no public transport to Membury, so further development will only increase traffic levels (clearly not a sustainable location). Recent planning applications give little or no serious consideration to travel plans. Even more alarming is the lack of environmental impact assessments in what is supposed to be an AONB.</p> <p>As residents, we often experience power outages, with the utility companies blaming the increased demand of the industrial users as the infrastructure can't cope.</p> <p>We hope the plan will incorporate the real-world experiences of residents, halting or seriously limiting future development at Membury the current uncontrolled expansion is unsustainable, environmentally disastrous and will lead to further RTA's and, inevitably, fatalities at the dangerous Membury crossroads.</p> <p>Other objections and consequences of allowing further expansion at Membury include the following.</p> <ul style="list-style-type: none"> - No environmental Impact Assessments – why? - No cumulative impact assessments for Membury and development impact the Critical Infrastructure-e.g constant power cuts. - No flood risk assessments-the increased business footprint has caused localised flooding and no permeable membranes. - Pollution/Carbon Footprint increase-which goes against WBC's Policy as there is no public transport. - Noise impact and Air quality loss as experienced by many local residents. Loss of amenity from the uncontrolled development at Membury. - Size and scale of developments out of keeping with the AONB (Area of Outstanding Natural Beauty) Policy at a time when the Government is stressing the importance of protecting these areas. - WBC Need to Protect the Night skies and Wildlife habitats. - The Stantec report still states that there is no need for Industrial development in this area but that it is required in Newbury and Reading. - The economic arguments do not outweigh the environmental impact that these massive industrial developments are having on the landscape. - The rural character of the area is being destroyed by WBC. It's not too late to halt the sprawl of Membury.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hadden-Paton, Alisdair
Consultee Full Name	Mr Alisdair Hadden-Paton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS354
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We are writing to raise our concerns regarding the proposed industrial development at Membury, and the associated issues that are impacting our community and environment. We are deeply concerned about the following issues:</p> <ol style="list-style-type: none"> 1 Increased traffic on rural road networks: The increase in industrial activity at Membury will lead to increased traffic on local roads, which will have a significant impact on the local community. The roads are not designed to accommodate the volume of traffic that already exists and the increase that will result from further development will lead to more safety concerns for pedestrians, cyclists, and motorists. 2 Unsustainable development plans: There are no sustainable travel plans in place for the proposed industrial development at Membury. This is particularly concerning given the rural location of the development, which makes it challenging to access via public transport. 3 No environmental impact assessments: We are concerned that no environmental impact assessments have been carried out for the proposed development, particularly given the significant impact it will have on the local environment. 4 Cumulative impact assessments: There is a lack of cumulative impact assessments for Membury and other developments in the area, which is leading to critical infrastructure issues such as power cuts. This issue requires urgent attention. 5 Flood risk assessments: There have been no flood risk assessments carried out for the proposed development, and the increased business footprint has caused localised flooding. The lack of permeable membranes is also contributing to this issue. 6 Pollution/Carbon Footprint increase: The proposed industrial development at Membury will significantly increase pollution and the carbon footprint of the area, which goes against WBC's own policy. 7 Noise impact and Air quality: The proposed development will lead to an increase in noise and air pollution, which will have a significant impact on the health and wellbeing of local residents. 8 Size and scale of developments out of keeping with AONB policy: The proposed development is out of keeping with the Area of Outstanding Natural Beauty (AONB) policy, which is concerning given the government's emphasis on protecting these areas. 9 Need to protect the night skies and wildlife habitats: The proposed development will have a negative impact on the night skies and wildlife habitats in the area, which are critical for the conservation of local biodiversity.

	<p>0 Need to protect ancient woodland: The proposed development may impact ancient woodland, which is a valuable natural resource that needs to be protected.</p> <p>1 Concerns for surface water runoff: The proposed development will have a significant impact on surface water runoff, which may pollute local chalk streams and the aquifer.</p> <p>2 Industrial spread into agricultural land: The proposed development will lead to the spread of industry into agricultural land, which may have a negative impact on local food production and the rural economy.</p> <p>3 Stantec report: The Stantec report indicates that there is no need for industrial development in this area, but that it is required in Newbury and Reading.</p> <p>4 Economic argument vs environmental impact: We believe that the economic arguments for the proposed industrial development at Membury do not outweigh the significant environmental impact it will have on the landscape and local community.</p> <p>5 Destruction of rural character: The proposed industrial development at Membury will significantly impact the rural character of the area, which is a critical part of our community and needs to be protected.</p> <p>We urge you to take notice of these concerns and ensure that any proposed industrial development at Membury is carried out in a way that is environmentally sustainable and socially responsible. We believe that it is possible to strike a balance between economic development and environmental protection, and we urge you to prioritise the needs and concerns of local residents in any decision-making processes related to this issue.</p> <p>Thank you for your attention to this matter.</p>
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Coppinger, Sam
Consultee Full Name	Sam Coppinger
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS438
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other	Web

* SMS * Web * Unknown	
Response Date	02/03/2023 00:40:00
Attached Files	IMG_0960.jpeg
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	Not qualified to say
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>This site LAM6 (now ESA2) did not appear in the original draft plan but when a planning application 19/02979/OUTMAJ was made it miraculously appeared in the second draft plan ahead of the decision. Some documentation even seemed to hint that the application proposed and already been approved... I would like to see some investigation as to what happened here...</p> <p>Comment to follow is relevant to ESA2 and 3</p> <p>The LPA's own consultation (Stantec) found that Membury is unsustainable as a location for B2/B8 industrial development due to its location 4.5km away from A338 and M4 J14. There is only one bus per day 1.5 km away along roads that are unlit and with no footpaths. Cycling is also dangerous. Highways Officers state that travel plans are generally unsuccessful as a solution. Traffic assessments must use TRICS data and applicants should not be able to use their own traffic data in applications. Conditions pertaining to traffic data should not be allowed in order to better control traffic volumes on the local road network. It is unclear why the LPA continues to pursue this location for industrial development. It is not in line with the sustainability policies of the LPA nor with the NPPF.</p> <p>There have been 4 serious accidents in the last 3 months on the B4000 / Ermin Street, each one involving 3 or 4 vehicles. One incident involved an HGV crashing into trees, taking out an electricity pole and</p>

	<p>jackknifing into a residential property. Sleeping residents were just a couple of feet from the cab. One week later, the same spot saw yet another accident with two cars written off and a builders lorry driven through a hedge. Two accidents involving multiple vehicles at the Ermin Street / Ramsbury Road (Membury) crossroads have also taken place. One of which took out an electricity pole. In all instances, all 3 emergency services were called and the road closed for several hours. When these roads are closed businesses are impacted and the rural road network is heavily affected. This situation is exacerbated when the M4 is closed as the B4000 is a diversion road in this instance.</p> <p>The rural character of the area is being significantly impacted through traffic and the volume of traffic is impacting the structure of some of the older properties situated close to the road. Air pollution levels along the B4000 are already high at 10.4 similar to the centre of Newbury, adding more traffic to the roads will only make this worse. Increasing light pollution has been devastating on our local bat population despite the LPAs poor attempts at mitigation. Noise pollution is also increasing. Local ancient woodland is also heavily impacted by industry. I have lived in Lambourn Woodlands since 1994 but have only noticed a significant deterioration in local amenity in the last 8 years. It seems unhelpful when officers dismiss any objections regarding negative impacts on the amenity of residents as the area is already impacted.</p> <p>There is no evidence or justification for allowing the development of further sites especially of this size at Membury. The location cannot sustain it. Expansion is inappropriate. Critical infrastructure is missing. There are electricity supply issues as the industrial estate often draws too much power and the network cannot sustain it. Cables burn out from time to time and there are frequent outages. Residential supply can be unreliable as a result. There is a known surface water flooding issue on 3rd party land as a result of overdevelopment on the industrial estate. The LPA continues to ignore this - allowing sites to come forward and be developed in a piecemeal fashion. Their approach is not resolving the problem - residents should not be asked to attenuate water run-off on their land. A Surface Water Management Plan is required.</p> <p>It would also be appropriate to have a Flight Safety Zone for Membury and also a major incident plan as none exists at the moment. Membury is home to two service areas with fueling stations, adjacent to a trunk route, a fuel depot, light aircraft activity, a chemical company dealing in solvents, a timber yard and a grain drier amongst other things. Not to have a plan for this is negligent.</p> <p>Please see attached photograph demonstrating how HGVs are unsuitable on B4000/Ermin Street. (Attachment 0960.jpg)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Not qualified to say</p>
<p>4. Proposed Changes</p>	<p>A masterplan for Membury is required encompassing a site specific environmental impact assessment and including a surface water management plan to ensure infrastructure is in place before further development can go ahead.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Our community would like be able to answer questions about Membury and to give a residents view point. Our community feels unheard.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS978
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	No

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	

4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yeld, Piers
Consultee Full Name	Piers Yeld
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1633
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>10.12 Critical need to address inaction regarding WBC's core strategy, carbon reduction</p> <p>The LPR lauds the location opportunities for industry highlighting the M4 and A34 crossroads in the centre of West Berkshire. But the reality is our road network beyond that motorway with just junctions 13 and 14, is made up of a few A and many small B roads. Where is the thinking and planned investment to improve the links between major roads to access industrial areas like Membury? With goals to develop these places significantly, actions must be taken to accommodate heavy vehicles as they commute to and from the M4 over small country roads not designed to carry HGV's. The B4000 requires constant road repairs, which will worsen as traffic volume increases. Urgent signage and speed enforcement measures to slow traffic to safe limits are required now. Where are those plans and how will WBC tackle the lack of bus services, let alone provide any kind of safe cycling and walking routes?</p> <p>New ideas are desperately needed to create a sustainable traffic policy. Why not consider ideas such as: serious traffic calming measures to ensure slower vehicle speeds equals less fuel burn; educating businesses to lessen HGV diesel emissions and noise with potential "congestion" charging to encourage environmentally safer alternatives; providing and marketing new, regular rural mini-bus services; incentives to encourage job sharing schemes; etc.</p> <p>Top WBC management commitment and resource must be given to tackling something that is strategically critical and requires urgent actioning if WBC's Local Plan 2037 is to succeed. Simply adding "sustainability" aspirations within each policy is not going to fix this. A huge amount of work needs to be done by Highways to obtain up to date traffic data, strategies to tackle the issues, new ideas and measurements to generate an air quality improvement program.</p> <p>If climate emergency is a core strategy, we are way behind target, and urgent measures are needed to get us back on track. Time is running out</p> <p>WBC Planning decisions are made in advance of public consultation</p> <p>This Local Plan's ambitions as well as Policy guidance/constraints in strategic terms by West Berkshire Council is very similar to what was drafted two years ago for consultation with the Public. For example, Policy SP2n states that in the North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities. Development will be required to respond positively to the local context, conserving and enhancing local distinctiveness, sense of place and setting of the AONB. The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, should be preserved. The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals. Development in the North Wessex Downs will be required to support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape. Planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest.</p>

Yet, the Western Area of WBC's Planning Committee gave permission in 2021 to build a giant logistics warehouse on 10,381 square metres of AONB land allowing Membury businesses to expand across protected AONB land (Lam 6) despite fierce local and parish objections: the building scale is out of keeping with its rural surrounds; the transport links to the site are unsustainable using a B-road already over-crowded with HGV's, no close buses, unsafe cycling and walking access to the site etc.

It seems WBC Planning decides what it wants to happen well in advance. The LAM-6 site was already set out as an "approved" development site by WBC consultants, Stantec in their 2020 report. This was several months before that decision was "formally" made by the Planning committee. In this report, it is suggested the site would be part of future industrial expansion plans to provide 19% of growth targets. This seems disingenuous since WBC clearly decided it would go ahead in discussions with their industrial development consultants 3 years ago.

So why seek consultation for LAM-6 in this plan if a) it is now a done deal and b) it contravenes so many sensible "strategic" constraints, yet have been waived? It makes a mockery of any meaningful dialogue via a public consultation when Planning decides major developments beforehand on.

Promises not kept

Policy ESA 2 states the LAM-6 site (Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands) will be developed in accordance with various provisions. One of the provisions to mitigate the community impact industrial developments on the local road network is the need for a transport assessment: *C) Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required*

Again, there has been no genuine assessment of the likely impact on traffic from this specific development. Via tactical "chicanery" the applicant used a "Personal Condition" to avoid having to use TRICS to forecast standard traffic volumes. Instead, their own internal estimates based on old data was used to determine a forecast. This allowed a lower traffic estimate to be debated vs data via TRICS, which at 750 extra HGV's per day, was significantly higher.

The provision to mitigate the impact of this development on our roads should use real numbers that are not disguised and are current. This should lead WBC Highways to provide a transport plan that mitigates issues for the benefit of road users and the local community. Accepting the Applicant will use Agency shift workers from Reading and Swindon via mini-bus to 'pick 'n pack' at the new warehouse on minimum wages, all outside the local employment zone, does not mitigate the hundreds of extra HGV's this development will bring on a daily basis. WBC Highways have delivered no road mitigation plan.

Policies must genuinely be followed if LPR 2037 is to retain credibility

12.19 WBC's 2019 landscape Character Assessment outlines that rural areas are more at risk from piecemeal development:

It is especially important to consider the impact that developing a site will have on conserving/enhancing local distinctiveness and sense of place. A successful development in the countryside depends on having a clear understanding of the site's significance, its setting in the wider landscape and sensitivity to and capacity for change

With a further 5,200 square metres of industrial development plans at Membury under LAM-10 (Land to the south of Trinity Grain, Lambourn Woodlands), together with LAM-6, the combined area will contribute almost 30% of industrial land 15-year growth targets. That is such a significant increase it demands that funding for risk assessments are carried out. No longer can it be acceptable that the need for an Environmental Impact Assessment is ignored. With flooding, excess lighting, noise, pollution and emissions, these are all ramping up as major issues at the Membury site. This plus the lack of a proper transport assessment to resolve issues and a plan to carry out appropriate measures must be committed to. Extraordinarily in my view is there any reference to addressing these problems to make industrial expansion plans succeed for the benefit to the area.

Unless Policy DM 35 is genuinely addressed to sustain a prosperous rural economy, the industrial development at Membury will increasingly destroy the rural surrounds of Lambourn's agricultural and equine community. It will certainly drive out those living and working in the Lambourn Woodlands area, rather than encouraging them to stay and prosper.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1769
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	We support the proposed criterion: "Development will be informed by a Heritage Impact Assessment (HIA)", due to the presence of a nearby Scheduled Monument, to assess any assets linked with the former military airfield, and to consider the significance of Lyckwood Farm (GII) and any mitigation needed to reduce harm.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Woodlanders Protection Group
<p>Consultee Full Name</p>	Anthony King
<p>Consultee Organisation</p>	Woodlanders Protection Group
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS1230
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	DOCUMENT -Appendix 8c SA/SEA of Employment Sites LAM6 .LAND WEST OF MEMBURY ROAD, WALKERS LOGISTICS. Assesment Table page 33. SA Sub Objectives- 9a To reduce West Berkshire's contribution to Green house gas emissions.

No effects of Policy on SA Objectives are measured

Mitigation- "Mitigation measures would be required"

Comment- " ..there should be no overall impact on any element of sustainability as a result of this development."

My comments - The Council's own Officers have stated that this development is NOT Sustainable. The Council's own Officers have called for no more development at Membury Industrial Area, as the whole site is NOT Sustainable.

- Objective 2(a)- "To support healthy active lifestyle.

- The site will not impact on health, active lifestyle.
- All sites will need to consider travel planning measures for staff which could include support for active travel to and from site"
- "The site is promoted for employment use, it is unlikely there will be an impact on any element of sustainability in relation to health, safety, wellbeing and inequalities.

My Comments- (Note these are based in the current situation and the recently approved development on Lam 6)

This Objective, 2a, will never be met, so 2 statements above are untrue for residents who are severely impacted.

Staff and workers cannot access this site by walking or cycling and have to use private motorised vehicles. Third relating to sustainability, can never be monitored or regulated.

The lanes used as access to this site can NO LONGER be used for walking, cycling or horse riding due to the volume of traffic including small vehicles but especially HGV's which are and will be generated on those lanes to access the trunk road network. It is now extremely dangerous to enter/ exit properties on these lanes. In addition the council have allowed the applicant, Walkers, to suppress the Traffic generation figures in the accepted scheme. This suppression is against Best Practice in Traffic and Transport Planning, can never be monitored or regulated and is possibly illegal. The result of this will be a dramatic rise in HGV vehicles on the access lanes to further reduce the chance of residents leaving their home in a car and preventing residents of the whole area living active lifestyles.

Objective 4(a) " To reduce accidents and improve safety."

4(b) " To increase opportunities for walking, cycling and use of public transport."

The traffic generated from Membury and the enormous future traffic to be generated make the surrounding network of lanes extremely dangerous. There are recent examples of HGV and other vehicles hitting a house outside of normal working hours. There is limited opportunity to improve safety and reduce accidents.

There is no viable Public Transport near the site. The closest is at Hungerford 10km away.

Objective 5(a) "To conserve and enhance ...biodiversity..."

Objective 5(b) "To conserve and enhance the character of the landscape."

Erecting a warehouse the size of a major sports stadium in a field, used for grazing sheep, in the AONB and generating potentially 850 vehicle trips per day CAN NOT conserve or protect anything in the local area.

Objective 10(a) "To encourage a range of employment opportunities that meet the needs of the district."

(b) (c "To support a strong, diverse economic base..."

There is little economic benefit to the local area as most of the current Walker's employees live outside West Berkshire and some of those are bussed in from Reading and Swindon.

This reinforces the view of the Council's Consultants, Stantec, who carried out the supporting study to this plan, that, as all the employee resources are in the East of the District, the use of the Membury site on the Western edge was not supported and any warehousing should be in the East of West Berkshire close to Motorway Junctions.

Overall Effect

Comments on Text.

How can anyone say " The site will have an overall neutral impact on Sustainability." The authors of this report have never studied the area or the current site.

There are no sustainable travel options available which is why some WBC officers have asked for no further development at Membury.

There are limited available staff close to the site and nearly all will come from outside the area, many from Reading, Wiltshire and Hampshire.

There is no public transport so they will all have to be bussed in or use their own vehicles.

Walking and Cycling are not possible due to the dangerous nature of the local road network.

GENERAL POINT ABOUT THE Industrial Area at Membury.

West Berkshire should not include this site in this plan as:

- The current sites are unmanaged and the council has little information on the ownership, tenants and changes of use that are taking place.
- There is no joined up Master Plan of the area showing current and future activities or land use.
- There is no Environmental impact Assessment of the whole site or any part of it.
- There is no Drainage Strategy for Membury and hence no site wide drainage infrastructure which is now leading to local flooding.

	<ul style="list-style-type: none"> • There is no understanding of the utilities demand and capacity. The power system in the local area is often down with temporary generators mobilised to support the local community. • The local road system is unsuitable for the current traffic generation and any increase will further degrade it. • There is no Risk Assessment available for the site as a whole. With a Live airfield adjacent, a major motorway and service area, chemical storage, major fuel storage and unknown risks within the current businesses there could be a disaster waiting to happen. • The location is UNSUSTAINABLE. There is no VIABLE public transport within 10 kilometres, so ALL workers, goods, deliveries have to access the site by road based vehicles. As well as making the area unsafe the quality of healthy life is compromised. COUNCIL OFFICERS HAVE STATED THAT THE INDUSTRIAL SITE IS NOT SUSTAINABLE AND NO FURTHER DEVELOPMENT SHOULD TAKE PLACE. Despite this the Council continue to approve more vehicle intensive planning applications, sometimes with the WRONG traffic generation forecasts <p>For this local plan, I have focussed on the area I know best and it is clear all plans for further industrial expansion at Membury should be removed, as there is little information to support this and overwhelming information to STOP any further development there.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1853
Chapter / Policy / Appendix Number	Policy ESA 2
Chapter / Policy / Appendix Title	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6)
Order	138
Submission Type * E-Mail	E-Mail

<ul style="list-style-type: none"> * Letter * Other * SMS * Web * Unknown 	
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? <ul style="list-style-type: none"> * Yes * No 	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. <ul style="list-style-type: none"> * Yes * No 	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. <ul style="list-style-type: none"> * Yes * No 	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. <ul style="list-style-type: none"> * Yes * No 	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. <ul style="list-style-type: none"> * Yes * No 	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>This site is on Principal bedrock aquifer</p> <p>Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. East Shefford STW has a 0.1mg/l stretch target for P. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. We would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. As with Newbury or any site with stretch targets for Phosphorous, any additional loading may impact their ability to meet the environment act objectives.</p>

	As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site ESA2.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site ESA2.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Taylor, Steve
Consultee Full Name	Steve Taylor
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS374
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	26/02/2023 09:58:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I have been appalled by the continued push to expand the Membury site despite the complete lack of transport infrastructure. It seems the that the only agenda West Berks Council have is to plough on with industrialisation regardless of the irreparable damage done to the local area of Outstanding National Beauty. My home is on the B4000 the traffic on which has increased immeasurably in the 35 years my wife and family have lived there. We are woken through the night at ever-increasing intervals - my wife is seriously ill - and this is only set to get even worse. This is a minor road by its very name that is taking major heavy goods traffic and is already crumbling.</p> <p>I honestly believe that West Berks Council are completely blind to the damage that is being done to the health of people who have no wish other than to lead a peaceful life, let alone the havoc caused to the environment and countryside. The council only need to see a developer brandishing a debit card with a promise of employment that benefits people from outside this area to simply roll out the welcome mat no matter the consequences.</p> <p>The Membury development plans are unsustainable if local welfare is given the most minimal consideration, plus the risk of localised flooding, all this without even considering the pollution and carbon footprint. However the council appears keen to impliment virtually everything that is put before them concerning Membury until it doesn't suit their purpose.</p> <p>Good alone knows what the light pollution and carbon pullution will do to the local wildlife. Developers care not one jot, they simply wish to boost their wealth no matter what the cost, aided and abetted by the council planners. No heed is paid to the water run off that will pollute ancient chalk streams and poison the aquifer.</p> <p>It would appear that the Stantec Report is quite clear that development is needed in Newbury and Reading but not here.</p> <p>That you have allowed the despised Walker Development to proceed shames you all. It is this department which is overseeing the demise of an area of a ONB. I have zero faith or confidence in West Berkshire Planning to stop this destruction which will see the local infrastructure gradually crumble until complete decay renders it totally unfit for any purpose.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Kristensen, Lorna
Consultee Full Name	Lorna Kristensen
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS452
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 10:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>I am writing to file my complete OBJECTION to the continued expansion of industry at Membury. I write in the hope that you will listen to the RESIDENTS who live in this AREA. However, it is obvious, that so far, nothing we say has any impact.</p> <p>TRAFFIC. The B4000 is inadequate to handle the huge amount of enormous lorries intended if this planning is allowed. There has already been an HGV smashed into the side of a cottage. The road is deteriorating by the day with potholes. The road is too small on some bends for 2 HGVs to pass. These lorries go through the villages as 60/70mph and there are no speed restrictions they adhere to. Would someone please explain to us why they are banned through Wickham B4000 and not through Lambourn Woodlands.</p> <p>These lorries not only abuse the B4000 but also the small lanes behind Membury where they cut through and get stuck around the bends. There must be a full enquiry by the Highway department delivered personally, to all the residents affected by this development.</p> <p>EMPLOYMENT This unsustainable development in an ANOB has no travel plans. There are not enough local employees to work here so they will be coming from outside areas. There is no travel plan buses etc. to facilitate their journeys.</p> <p>There is NO ENVIRONMENTAL IMPACT ASSESSMENT FOR MEMBURY in ANOB AREA.</p> <p>There is no cumulative impact assessment for Membury and all development is impacting on the Critical Infrastructure i.e. power cuts, water shortage etc.</p> <p>WBC HAS A POLLUTION AND CARBON footprint Policy which has not been adhered to with regard to planning at Membury. This causes noise impact (from small planes for example) and air quality. The M4 has been shut down AT Least twice due to chemical releases from Rutpen and we have been told to stay in our houses for our safety.</p> <p>The size and scale of developments are totally against anything in an ANOB AREA. The government is adamant these areas should be protected especially ancient woodland and pollution of chalk streams. It seems the WBC has no worry about industrial spread onto agricultural land. There has been no risk assessment for flooding.</p> <p>THE STANTEC REPORT states that there is NO evidence base for further Industrial expansion at Membury. Therefore there is no justification for further development on this site. (Esa2 and 3)</p> <p>It is required in NEWBURY AND READING where of course there are many people available to employ. The economic arguments do not outweigh the environmental impact these massive industrial developments are having on this landscape.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hadden-Paton, Alisdair
Consultee Full Name	Mr Alisdair Hadden-Paton
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS356
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We are writing to raise our concerns regarding the proposed industrial development at Membury, and the associated issues that are impacting our community and environment. We are deeply concerned about the following issues:</p> <ol style="list-style-type: none"> 1 Increased traffic on rural road networks: The increase in industrial activity at Membury will lead to increased traffic on local roads, which will have a significant impact on the local community. The roads are not designed to accommodate the volume of traffic that already exists and the increase that will result from further development will lead to more safety concerns for pedestrians, cyclists, and motorists. 2 Unsustainable development plans: There are no sustainable travel plans in place for the proposed industrial development at Membury. This is particularly concerning given the rural location of the development, which makes it challenging to access via public transport. 3 No environmental impact assessments: We are concerned that no environmental impact assessments have been carried out for the proposed development, particularly given the significant impact it will have on the local environment. 4 Cumulative impact assessments: There is a lack of cumulative impact assessments for Membury and other developments in the area, which is leading to critical infrastructure issues such as power cuts. This issue requires urgent attention. 5 Flood risk assessments: There have been no flood risk assessments carried out for the proposed development, and the increased business footprint has caused localised flooding. The lack of permeable membranes is also contributing to this issue. 6 Pollution/Carbon Footprint increase: The proposed industrial development at Membury will significantly increase pollution and the carbon footprint of the area, which goes against WBC's own policy. 7 Noise impact and Air quality: The proposed development will lead to an increase in noise and air pollution, which will have a significant impact on the health and wellbeing of local residents. 8 Size and scale of developments out of keeping with AONB policy: The proposed development is out of keeping with the Area of Outstanding Natural Beauty (AONB) policy, which is concerning given the government's emphasis on protecting these areas. 9 Need to protect the night skies and wildlife habitats: The proposed development will have a negative impact on the night skies and wildlife habitats in the area, which are critical for the conservation of local biodiversity. 0 Need to protect ancient woodland: The proposed development may impact ancient woodland, which is a valuable natural resource that needs to be protected. 1 Concerns for surface water runoff: The proposed development will have a significant impact on surface water runoff, which may pollute local chalk streams and the aquifer. 2 Industrial spread into agricultural land: The proposed development will lead to the spread of industry into agricultural land, which may have a negative impact on local food production and the rural economy. 3 Stantec report: The Stantec report indicates that there is no need for industrial development in this area, but that it is required in Newbury and Reading. 4 Economic argument vs environmental impact: We believe that the economic arguments for the proposed industrial development at Membury do not outweigh the significant environmental impact it will have on the landscape and local community. 5 Destruction of rural character: The proposed industrial development at Membury will significantly impact the rural character of the area, which is a critical part of our community and needs to be protected. <p>We urge you to take notice of these concerns and ensure that any proposed industrial development at Membury is carried out in a way that is environmentally sustainable and socially responsible. We believe that it is possible to strike a balance between economic development and environmental protection, and we urge you to prioritise the needs and concerns of local residents in any decision-making processes related to this issue.</p> <p>Thank you for your attention to this matter.</p>

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bridle, Steve and Jennie
Consultee Full Name	Mr Steve and Jennie Bridle
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS716
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As residents of Lambourn Woodlands, we would like to ensure our comments are recognised and incorporated into the local plan regarding the Membury Industrial area.</p> <p>We urge the plan to Stop further development at Membury for the following reasons.</p> <p>Having lived next to the notorious Membury crossroads for over 25 years, we wanted to highlight the ever-increasing numbers of HGVs using the road and the negative impact on the quality of life for residents. Ermin Street (The primary road access to Membury), originally a narrow country lane, widened to aid the construction of the M4 in the late '60s. It was never designed for the current traffic levels and, in places, is barely wide enough for 2 HGVs to pass. There are numerous sharp bends; adverse cambers and long straights encourage speed and overtaking, which is extremely dangerous on most of the road and hazardous in certain sections. As an unnaturally widened road, most of the properties that front onto the road are very close to the road, making life next to the road increasingly unpleasant, noisy and dangerous. We can vouch for this when pulling into or out of our driveway, having had numerous near misses. Recently a local property was narrowly missed when an out-of-control HGV crashed through its garden wall; the same property was also hit in a separate incident only days earlier. The reality of living on Ermin Street, the main road leading to Membury!</p> <p>We object to further expansion to the Membury industrial area as this is leading to unsustainable traffic and HGVs on Ermin Street. This also highlights the danger of the Membury crossroads junction, the main route into the already over-expanded Membury. There have been many crashes on Membury crossroads in recent months, and it's only a matter of time before fatalities occur.</p> <p>There is no public transport to Membury, so further development will only increase traffic levels (clearly not a sustainable location). Recent planning applications give little or no serious consideration to travel plans. Even more alarming is the lack of environmental impact assessments in what is supposed to be an AONB.</p> <p>As residents, we often experience power outages, with the utility companies blaming the increased demand of the industrial users as the infrastructure can't cope.</p> <p>We hope the plan will incorporate the real-world experiences of residents, halting or seriously limiting future development at Membury the current uncontrolled expansion is unsustainable, environmentally disastrous and will lead to further RTA's and, inevitably, fatalities at the dangerous Membury crossroads.</p>

	<p>Other objections and consequences of allowing further expansion at Membury include the following.</p> <ul style="list-style-type: none"> - No environmental Impact Assessments – why? - No cumulative impact assessments for Membury and development impact the Critical Infrastructure-e.g constant power cuts. - No flood risk assessments-the increased business footprint has caused localised flooding and no permeable membranes. - Pollution/Carbon Footprint increase-which goes against WBC's Policy as there is no public transport. - Noise impact and Air quality loss as experienced by many local residents. Loss of amenity from the uncontrolled development at Membury. - Size and scale of developments out of keeping with the AONB (Area of Outstanding Natural Beauty) Policy at a time when the Government is stressing the importance of protecting these areas. - WBC Need to Protect the Night skies and Wildlife habitats. - The Stantec report still states that there is no need for Industrial development in this area but that it is required in Newbury and Reading. - The economic arguments do not outweigh the environmental impact that these massive industrial developments are having on the landscape. - The rural character of the area is being destroyed by WBC. It's not too late to halt the sprawl of Membury.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Coppinger, Sam
<p>Consultee Full Name</p>	Sam Coppinger
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1126
<p>Chapter / Policy / Appendix Number</p>	Policy ESA 3
<p>Chapter / Policy / Appendix Title</p>	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)

Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 00:40:00
Attached Files	IMG_0960.jpeg
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	Not qualified to say
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>This site LAM6 (now ESA2) did not appear in the original draft plan but when a planning application 19/02979/OUTMAJ was made it miraculously appeared in the second draft plan ahead of the decision. Some documentation even seemed to hint that the application proposed and already been approved... I would like to see some investigation as to what happened here...</p> <p>Comment to follow is relevant to ESA2 and 3</p> <p>The LPA's own consultation (Stantec) found that Membury is unsustainable as a location for B2/B8 industrial development due to its location 4.5km away from A338 and M4 J14. There is only one bus per day 1.5 km away along roads that are unlit and with no footpaths. Cycling is also dangerous. Highways Officers state that travel plans are generally unsuccessful as a solution. Traffic assessments must use TRICS data and applicants should not be able to use their own traffic data in applications. Conditions</p>

	<p>pertaining to traffic data should not be allowed in order to better control traffic volumes on the local road network. It is unclear why the LPA continues to pursue this location for industrial development. It is not in line with the sustainability policies of the LPA nor with the NPPF.</p> <p>There have been 4 serious accidents in the last 3 months on the B4000 / Ermin Street, each one involving 3 or 4 vehicles. One incident involved an HGV crashing into trees, taking out an electricity pole and jackknifing into a residential property. Sleeping residents were just a couple of feet from the cab. One week later, the same spot saw yet another accident with two cars written off and a builders lorry driven through a hedge. Two accidents involving multiple vehicles at the Ermin Street / Ramsbury Road (Membury) crossroads have also taken place. One of which took out an electricity pole. In all instances, all 3 emergency services were called and the road closed for several hours. When these roads are closed businesses are impacted and the rural road network is heavily affected. This situation is exacerbated when the M4 is closed as the B4000 is a diversion road in this instance.</p> <p>The rural character of the area is being significantly impacted through traffic and the volume of traffic is impacting the structure of some of the older properties situated close to the road. Air pollution levels along the B4000 are already high at 10.4 similar to the centre of Newbury, adding more traffic to the roads will only make this worse. Increasing light pollution has been devastating on our local bat population despite the LPAs poor attempts at mitigation. Noise pollution is also increasing. Local ancient woodland is also heavily impacted by industry. I have lived in Lambourn Woodlands since 1994 but have only noticed a significant deterioration in local amenity in the last 8 years. It seems unhelpful when officers dismiss any objections regarding negative impacts on the amenity of residents as the area is already impacted.</p> <p>There is no evidence or justification for allowing the development of further sites especially of this size at Membury. The location cannot sustain it. Expansion is inappropriate. Critical infrastructure is missing. There are electricity supply issues as the industrial estate often draws too much power and the network cannot sustain it. Cables burn out from time to time and there are frequent outages. Residential supply can be unreliable as a result. There is a known surface water flooding issue on 3rd party land as a result of overdevelopment on the industrial estate. The LPA continues to ignore this - allowing sites to come forward and be developed in a piecemeal fashion. Their approach is not resolving the problem - residents should not be asked to attenuate water run-off on their land. A Surface Water Management Plan is required.</p> <p>It would also be appropriate to have a Flight Safety Zone for Membury and also a major incident plan as none exists at the moment. Membury is home to two service areas with fueling stations, adjacent to a trunk route, a fuel depot, light aircraft activity, a chemical company dealing in solvents, a timber yard and a grain drier amongst other things. Not to have a plan for this is negligent.</p> <p>Please see attached photograph demonstrating how HGVs are unsuitable on B4000/Ermin Street. (Attachment 0960.jpg)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Not qualified to say</p>
<p>4. Proposed Changes</p>	<p>A masterplan for Membury is required encompassing a site specific environmental impact assessment and including a surface water management plan to ensure infrastructure is in place before further development can go ahead.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Our community would like be able to answer questions about Membury and to give a residents view point. Our community feels unheard.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS979
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Woodlanders Protection Group
Consultee Full Name	Anthony King
Consultee Organisation	Woodlanders Protection Group
Agent Full Name	
Agent Organisation	
Comment ID	PS1232
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>DOCUMENT -Appendix 8c SA/SEA of Employment Sites</p> <p>This site is adjacent to the green field to be used for the Lam 9, Walkers, site. On that basis it has similar characteristics.</p> <ol style="list-style-type: none"> 1)Both are a “ Green Lung” in the middle of the Membury Industrial Area. 2)Both use the same network of country lanes for vehicle access. 3)For both there is no available and viable Public Transport to the site. 4) Land adjacent to this site is liable to flooding. 5) This site is adjacent to rural homes. 6) Both are not sustainable and should not be developed. 7) Both generate HGV which are a risk to the local populations. 8) it is not clear what activities would take place on this site but generally the Economy of West Berkshire is strong so it is unlikely that there would be any added Economic gain. <p>GENERAL POINT ABOUT THE Industrial Area at Membury.</p> <p>West Berkshire should not include this site in this plan as:</p> <ul style="list-style-type: none"> • The current sites are unmanaged and the council has little information on the ownership, tenants and changes of use that are taking place. • There is no joined up Master Plan of the area showing current and future activities or land use. • There is no Environmental impact Assessment of the whole site or any part of it. • There is no Drainage Strategy for Membury and hence no site wide drainage infrastructure which is now leading to local flooding. • There is no understanding of the utilities demand and capacity. The power system in the local area is often down with temporary generators mobilised to support the local community. • The local road system is unsuitable for the current traffic generation and any increase will further degrade it.

	<ul style="list-style-type: none"> • There is no Risk Assessment available for the site as a whole. With a Live airfield adjacent, a major motorway and service area, chemical storage, major fuel storage and unknown risks within the current businesses there could be a disaster waiting to happen. • The location is UNSUSTAINABLE. There is no VIABLE public transport within 10 kilometres, so ALL workers, goods, deliveries have to access the site by road based vehicles. As well as making the area unsafe the quality of healthy life is compromised. COUNCIL OFFICERS HAVE STATED THAT THE INDUSTRIAL SITE IS NOT SUSTAINABLE AND NO FURTHER DEVELOPMENT SHOULD TAKE PLACE. Despite this the Council continue to approve more vehicle intensive planning applications, sometimes with the WRONG traffic generation forecasts <p>For this local plan, I have focussed on the area I know best and it is clear all plans for further industrial expansion at Membury should be removed, as there is little information to support this and overwhelming information to STOP any further development there.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1854
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>This site is on Principal bedrock aquifer</p> <p>Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Natural England will be better placed to advise on the specifics of this. East Shefford STW has a 0.1mg/l stretch target for P. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. We would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. As with Newbury or any site with stretch targets for Phosphorous, any additional loading may impact their ability to meet the environment act objectives.</p> <p>As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site ESA3.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	As stated in our suggested amendments and notes on Policy DM7 <PS1555>, adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site ESA3.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Trinity Grain Limited (Represented by Carter Jonas)
Consultee Full Name	David Evans
Consultee Organisation	Trinity Grain Limited
Agent Full Name	Willow Mercer
Agent Organisation	
Comment ID	PS1303
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:01:00
Attached Files	Carter Jonas (Trinity Grain) Attachment.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>On behalf of our client, Trinity Grain Limited ('Trinity Grain'), we are instructed to submit the following representations to West Berkshire Council ('the Council') in response to its Regulation 19 consultation on the emerging West Berkshire Local Plan Review ('LPR').</p> <p>Trinity Grain is the sole landowner of 'Land to the south of Trinity Grain, Membury Industrial Estate' (hereafter 'the Site'). The Site extends to approximately 2.2 ha and lies immediately to the south of Membury Industrial Estate, a Principal Employment Area within the adopted Development Plan. A Site Location Plan demonstrating extent of land ownership is included at Appendix 1.</p> <p>Within the HELAA (Appendix 4, Stage 2c), the entry for LAM10 (the Site) concludes firstly that there is 1 land owner and then goes on to write in the 'Comments' column that the site is in multiple ownerships. To clarify, the site is owned entirely by Trinity Grain Limited, and they are acting as promoters and developers. Therefore, there are no availability issues pertaining to the site.</p> <p>Trinity Grain promoted the Site for employment development (specifically, office and/or storage and distribution uses) during a Call for Sites exercise run by the Council in December 2021. The LPR proposes allocation of the Site for employment development via Draft Policy ESA3, subject to defined parameters, including the provision of approximately 5,200sqm of B2 and/or E[g][iii] uses. An extract of Draft Policy ESA3 is shown at Appendix 2. The Site is also proposed to form part of an enlarged Designated Employment Area (DEA) covering the Membury Industrial Estate, development within which will be subject to the provisions of Draft Policy DM32.</p> <p>While Trinity Grain supports the Council's decision to allocate the Site for employment development, it does not consider that restricting potential uses to B2 and E[g][iii] (and excluding B8 uses) can be considered 'sound' with regard to the tests outlined at Paragraph 35 of the NPPF for several reasons outlined below.</p>

Please note, as requested by the Council, the contents of this document have been used to fill out the Representation Form, which is included at Appendix 3.

Draft Allocation Parameters Overview

This section assesses the sites potential against the proposed draft allocation parameters and provides Trinity Grain's view on the parameters.

Policy ESA3: Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)

<for table see attachment>

Pre-application enquiry

Earlier in 2023, on behalf of Trinity Grain, Carter Jonas submitted a pre-application enquiry for B8 (open storage) use for the site.

The pre-application enquiry included the following information:

- Preliminary Ecological Appraisal;
- Preliminary Landscape Visual Appraisal;
- Landscape Strategy;
- Transport Scoping Note;
- Planning Statement; and
- Site Layout.

The response from the LPA has not yet been received. However, it is evident from the pre-application investigations that B8 can conceivably be delivered on the site.

The pre-application package has been appended to these representations (appendix 4).

Suitability for B8 uses

Primarily, it is not clear why Draft Policy ESA3 de facto excludes B8 uses. As confirmed by paragraph 7.8 of the LPR, the Employment Land Review (ELR) (2020; 2022 Addendum) recommends a minimum industrial land requirement of 91,109sqm, or 23 ha of land, to 2039 to meet identified needs. The 'industrial land' requirement is the sum totalled requirement for B2, E[g][iii] (formerly B1[c]) and B8 uses.

The 2020 ELR (paragraph 4.72) recognises that "these uses generally occupy the same types of building, are generally inter-changeable and are difficult to distinguish in practice" with the exception of strategic-level warehousing under B8. This, in part, explains the appropriateness of identifying a collective industrial land requirement, rather than specific requirements for general industry, storage, distribution etc.

In lieu of the above, there is no sound justification as to why B8 uses would not be suitable. The only loose justification appears to be offered in the Employment Background Paper at paragraph 54:

"LAM10, land to the south of Trinity Grain, is located adjacent to the existing Membury Industrial Estate, and proposed to be allocated for B2 and E(g)(iii) uses. Such uses are considered appropriate given the size of the site and relationship with the surrounding uses".

Turning first to its relationship to surrounding uses, Membury Industrial Estate as an established employment site that provides B2 and B8 uses (including open storage), both currently and as proposed to be allocated in the LPR. Accordingly, there is no reason why the site should be precluded from being allocated for B8 uses by nature of its relationship with the surrounding uses.

In terms of size, it should be recognised that the B8 Use Class is broader than logistical and housed warehouse storage and can include other storage solutions, such as open storage. This part of the B8 use class is more akin to the collective industrial site typology, as outlined above.

The identification of the Site's development potential has been informed by a variety of background studies, including the HELAA and Landscape Sensitivity and Capacity Assessments, which take account of constraints (such as its location within an AONB). The results of these assessments have been carried forward into parameter constraints in Draft Policy ESA3, which govern suitable quantum (not uses) of development, including retaining the existing tree belt/hedgerow along the eastern and southern boundaries and controls to the height of "buildings".

However, Trinity Grain argues these controls would remain relevant to any proposed B8 use, including if no specific buildings with floorspace were provided in the case of open storage. For example, with such use, restricting development to the central part of the site, retaining the landscape buffer and restricting heights to the level of the grain silo towers in buildings and structures could be maintained. This has been evidenced by the Site Layout Plan submitted with the pre-application enquiry.

Trinity Grain, therefore, considers the de facto exclusion of B8 uses for the Site from Draft Policy ESA3 has not been justified, despite its promotion for such uses to the Call for Sites. Moreover, a B8 use can be considered suitable within the established parameter constraints.

Flexibility: Mitigating the shortfall

As detailed in Table 3 of the Employment Background Paper (2023), the LPR is inclusive of site allocations to provide only 58,400sqm of floorspace, or 16.6ha land. Accordingly, there will be a shortfall of 32,709sqm (or 5.4 ha of land) which the Council has stated cannot be met by neighbouring authorities.

In lieu of any identified shortfall, Trinity Grain considers there is an opportunity for the Council to be proactive and flexible with its employment land allocations to meet market demand. Paragraph 81 of the NPPF confirms planning policies should help create the conditions in which businesses can invest, expand and adapt. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraph 82 adds that policies should (inter alia): be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

Accordingly, the allowance for B8 uses to Draft Policy ESA3 would result in policy strategy and allocation that could enable rapid response to requirements for industrial land more generally.

	<p><u><i>Conflict with the DEA</i></u></p> <p>Finally, as currently drafted, the exclusion of B8 uses would be at odds with the provisions of Draft Policy DM32, which supports the redevelopment and regeneration of land within DEAs to provide business uses – including office, industry, storage and distribution.</p> <p>Accordingly, Draft Policy DM32 would not preclude the site from being redeveloped for B8 purposes in the future. As set out above, there is no sound justification for not allowing the allocation of this site for B8 purposes. This, therefore, does not represent an effective strategy or allocation. A simple solution would be to adopt flexibility up front to ensure the right use is delivered to meet market requirements whilst being subject to appropriate site-specific parameter constraints detailed in Draft Policy ESA3.</p> <p>Conclusion and Next Steps</p> <p>In summary, Trinity Grain considers parts of the LPR as currently drafted as unsound.</p> <p>Draft Policy ESA3, in restricting potential uses to B2 and E[g][iii] on the Site and de facto excluding B8 uses, is neither justified, effective or consistent with national policy. Trinity Grain recommends that the Council also allocate the Site for B8 uses, allowing greater flexibility in delivering its industrial land requirements and maintaining the importance of DEAs. This is a simple change, that would also allow the Council to maintain its defined parameter constraints for this Site (save for the recommendations made in this response).</p> <p>We trust that these representations clearly sets out Trinity Grain's concerns and that these will be addressed prior to submission of the LPR to the Secretary of State for Examination.</p> <p>Attachment: Full response and appendices.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	Trinity Grain recommends that the Council also allocate the Site for B8 uses, allowing greater flexibility in delivering its industrial land requirements and maintaining the importance of DEAs. This is a simple change, that would also allow the Council to maintain its defined parameter constraints for this Site (save for the recommendations made in this response).
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
5. Independent Examination	To allow appropriate updates relating to the development of the draft allocation site to be presented, to allow matters to be resolved because the plan is not sound.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	

Comment ID	PS1770
Chapter / Policy / Appendix Number	Policy ESA 3
Chapter / Policy / Appendix Title	Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM10)
Order	140
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We support the proposed criterion: "Development will be informed by a A Heritage Impact Assessment (HIA)", as amended to correct a minor typo.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Development will be informed by a A Heritage Impact Assessment (HIA)
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beenham Parish Council
Consultee Full Name	Ms Jennie Currie
Consultee Organisation	Beenham Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS22
Chapter / Policy / Appendix Number	Policy ESA 4
Chapter / Policy / Appendix Title	Beenham Landfill, Pips Way, Beenham (Site Ref: part of BEEN3 and part of BEEN5)
Order	142
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	06/02/2023 22:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>Local Plan Review – comments from Beenham PC</p> <p>ESA4- Beenham Landfill</p> <ul style="list-style-type: none"> • No objection in principle • Restrict development to quiet activities, as sound travels up the hill and can be heard in Beenham Village. • Landscape buffer should be of trees that will grow tall, to shield from views from higher land. • Lighting should be minimised.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS980
Chapter / Policy / Appendix Number	Policy ESA 4
Chapter / Policy / Appendix Title	Beenham Landfill, Pips Way, Beenham (Site Ref: part of BEEN3 and part of BEEN5)
Order	142
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p>

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1202
Chapter / Policy / Appendix Number	Policy ESA 4
Chapter / Policy / Appendix Title	Beenham Landfill, Pips Way, Beenham (Site Ref: part of BEEN3 and part of BEEN5)
Order	142
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Whilst AWE do not object in principle to the allocations, they reserve the right to consider and make representations upon any detailed proposal in due course under the terms of Policy SP4.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Environment Agency

Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1855
Chapter / Policy / Appendix Number	Policy ESA 4
Chapter / Policy / Appendix Title	Beenham Landfill, Pips Way, Beenham (Site Ref: part of BEEN3 and part of BEEN5)
Order	142
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>This site is on Historic landfill sites, COMAH, SPZ2+3,</p> <p>This site is located on top of a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beenham Parish Council
Consultee Full Name	Ms Jennie Currie
Consultee Organisation	Beenham Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS23
Chapter / Policy / Appendix Number	Policy ESA 5
Chapter / Policy / Appendix Title	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)
Order	144
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	06/02/2023 22:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>Local Plan Review – comments from Beenham PC</p> <p>ESA5 – Northway Porsche</p> <ul style="list-style-type: none"> • No objection in principle, although this area is a mixed housing and industrial zone. • Access road is in poor condition, and ownership of road is uncertain (?). This needs to be clarified. • Access road is dangerous for pedestrians and cyclists. It is a route from Beenham to rail station and bus-stops. A footpath must be provided. • Parameter d(v) should be deleted. The neighbouring recycling plant is very noisy. Permitted development should be restricted to activities that are not noisy, as there is housing in Beenham Grange and noise travels up the hill to Beenham Village.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS981
Chapter / Policy / Appendix Number	Policy ESA 5
Chapter / Policy / Appendix Title	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)
Order	144

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
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Please give reasons for your answer	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p>

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

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We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.

Water Response

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>.

Waste Response

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

Additional Comments

These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>

5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1203
Chapter / Policy / Appendix Number	Policy ESA 5
Chapter / Policy / Appendix Title	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)
Order	144
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Whilst AWE do not object in principle to the allocations, they reserve the right to consider and make representations upon any detailed proposal in due course under the terms of Policy SP4.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Dijkman Planning LLP

Consultee Full Name	Mr Ken Dijksman
Consultee Organisation	Dijkman Planning LLP
Agent Full Name	
Agent Organisation	
Comment ID	PS928
Chapter / Policy / Appendix Number	Policy ESA 5
Chapter / Policy / Appendix Title	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)
Order	144
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:52:00
Attached Files	PS928 Beenham Industrial Area Boundary Adjustment.jpg
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>I write to support the Proposed Submission (Regulation 19) Additional Employment Site ESA5 Northway Porche (Site Reference BEEN10) which I put forward for allocation in response to the previous consultation,</p> <p>I can confirm that the parameters set out within Policy ESA5 are considered broadly acceptable, but I have two concerns -</p> <p>1. Highways Contributions</p> <p>It is important that any financial contributions to off-site Highway Works (Point c.) must be:</p> <p>a. necessary to make the development acceptable in planning terms</p> <p>b. directly related to the development; and</p> <p>c. fairly and reasonably related in scale and kind to the development.</p> <p>In other words, any off-site highway works must be directly related in scale to the additional demand specifically arising from the allocation, and payment is necessary only if that additional demand cannot be accommodated by the existing capacity on the network.</p> <p>2. Building Design & Heights</p> <p>With regard to building Design and Heights (Point d) iv.) the determining issue should not be what <i>already exists on this site</i> but rather what visual impact any new buildings may have in landscape and rural character terms, considered in the broader landscape context of this site. This issue is covered by requirement e. as the required LVIA will consider the detail of landscape impact on the AONB.</p> <p>I look forward to attending the Local Plan Inquiry to support this allocation and to deal with the two issues above if the wording remains as currently proposed.</p> <p>I would be very pleased to discuss any minor changes to the wording to reflect my concerns, prior to the publication of the next consultation version of the plan.</p> <p>Request for Adjustment of the Boundary of Beenham Industrial Area (BEEN10) [See attached PS928 Beenham Industrial Area Boundary Adjustment]</p> <p>Correction needed to boundary of Beenham Designated Employment Area - I am objecting to policy SP 21 on the grounds that it does not include a 0.2 ha sliver of land within the Beenham Designated Employment Area (as defined under the previous policy SC9).</p> <p>Land Currently Used as Parking and Access— The current protected employment area utilises a small parcel of land containing parking and access, but it falls outside the designation. Correcting this requires no more than straitening the boundary line to reflect what is on the ground.</p> <p>Visually and Physically Enclosed - This parcel of land is visually and physically part of and used in association with, the industrial area. It contains parking and agricultural buildings, there will be no material effect on the landscape, the visual context is of the industrial area.</p> <p>Future Landscape Enhancement - The formal inclusion of this land offers future potential for boundary landscaping, of additional tree and hedge planting and screening, and therefore an overall improvement in landscape terms.</p> <p>Existing Establish Boundaries - The addition of the land would comprise no more than a recognition of its existing uses to an existing boundary line.</p> <p>Less than a 1% Increase - The current Protected Employment Area is approx. 21.7 Ha, the proposed additional 0.2 Ha of employment land would comprise less than a 1% increase, within established natural boundaries on land already mainly used for parking for the employment zone.</p> <p>There is nothing within the Landscape Sensitivity and Capacity Assessment 2022 for Beenham Industrial Area that prevents this minor adjustment to the boundary to reflect the reality on the ground.</p>

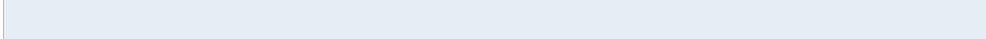
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1856
Chapter / Policy / Appendix Number	Policy ESA 5
Chapter / Policy / Appendix Title	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)
Order	144
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>This site is on SPZ2+3, secondary A superficial aquifer. Within 150m from historic landfill site</p> <p>There is a historic landfill historic landfill next to site which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance Which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1801
Chapter / Policy / Appendix Number	Policy ESA 5
Chapter / Policy / Appendix Title	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)
Order	144
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes	Yes

* **No**



Policy ESA 6 Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beenham Parish Council
Consultee Full Name	Ms Jennie Currie
Consultee Organisation	Beenham Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS24
Chapter / Policy / Appendix Number	Policy ESA 6
Chapter / Policy / Appendix Title	Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)
Order	146
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	06/02/2023 22:02:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>4. Proposed Changes</p>	<p>Local Plan Review – comments from Beenham PC</p> <p>ESA6 – Land adjacent to Padworth IWMF</p> <ul style="list-style-type: none"> • No objection in principle • The site is near to housing. Noisy activities should not be permitted. • The site is visible from high ground in Beenham Village. Tall landscape buffers should be provided.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Canal & River Trust
Consultee Full Name	Mrs Jane Hennell
Consultee Organisation	Canal & River Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS420
Chapter / Policy / Appendix Number	Policy ESA 6
Chapter / Policy / Appendix Title	Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)
Order	146
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	01/03/2023 14:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	This site is in close proximity to the Kennet & Avon Canal. We are pleased to note that there will a requirement for a traffic impact assessment to include the Padworth Swing Bridge, A detailed LVIA and contamination and ecological assessments. Such assessments should consider the adjacent canal and the need to adequately protect the water environment.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS982
Chapter / Policy / Appendix Number	Policy ESA 6
Chapter / Policy / Appendix Title	Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)
Order	146
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	Thames Water - Employment and Residential Site Allocations Table
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table [see 'Thames Water - Employment & Residential Site Allocations Table'. The text below under the headings 'Water Response', 'Waste Response' and 'Additional Comments' is extracted from the table for this site] provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Water Response</p>

	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response</p> <p>The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Additional Comments</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>AWE (Represented by RPS)</p>
<p>Consultee Full Name</p>	<p>Mr John Steele</p>

Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1204
Chapter / Policy / Appendix Number	Policy ESA 6
Chapter / Policy / Appendix Title	Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)
Order	146
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	Yes

* Yes * No	
Please give reasons for your answer	Whilst AWE do not object in principle to the allocations, they reserve the right to consider and make representations upon any detailed proposal in due course under the terms of Policy SP4.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1442
Chapter / Policy / Appendix Number	Policy ESA 6
Chapter / Policy / Appendix Title	Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)
Order	146
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The site contains the remnants of equipment and machinery to load trains with oil products and tranship between road and rail. It is therefore extremely likely to be contaminated.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Point (h) should be reworded to require an intrusive contaminated land assessment and remediation measures.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1802
Chapter / Policy / Appendix Number	Policy ESA 6
Chapter / Policy / Appendix Title	Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)
Order	146
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness. b) for ESA6, wording changes are needed to ensure the criterion is clear i.e. is the DBA required and then field evaluation, if necessary. We suspect this is simply a typo, so hopefully an easy fix.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford

Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1857
Chapter / Policy / Appendix Number	Policy ESA 6
Chapter / Policy / Appendix Title	Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)
Order	146
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

<p>Please give reasons for your answer</p>	<p>The site allocations presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document <see comments below></p> <p>This site is on SPZ2+3, secondary A superficial aquifer, next to historic landfill site</p> <p>There is a historic landfill historic landfill next to site which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance Which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p> <p>We assume wastewater will be discharged at the Reading STW. We have no concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Policy DM 1 Residential Development in the Countryside

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Withers, Brian
Consultee Full Name	Brian Withers
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	20/01/2023 17:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	It fails to support the directives in the NPPF in particular Policy DM1
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>It fails to support the spirit of the NPPF</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Emerging draft 2020-2037</p> <p><u>C1</u> Location of “New housing in the countryside within Housing Site Allocations DPD 2006-2026” Policy has been superseded by <u>SP1</u> Spatial strategy.</p> <p>Under the heading DM1, the following sub para appears.</p> <p><i>Exceptionally new residential development outside of adopted settlement boundaries will be permitted. These exceptions are solely limited to development which is appropriately designed and located and which satisfies one or more of the following criteria..</i></p> <p>Policy DM1 Residential Development in the countryside</p> <p><i>Sub Para i</i></p> <p><i>Limited residential infill in settlements in the countryside with no defined settlement boundary where:</i></p> <ol style="list-style-type: none"> 1 <i>It is within a closely knit cluster of 10 or more existing dwellings adjacent to, or fronting an existing highway; and</i> 2 <i>The scale of development consists of infilling a small undeveloped plot commensurate with the scale and character of existing dwellings within an otherwise built up frontage; and</i> 3 <i>It does not extend the existing frontage; and</i> 4 <i>The plot size and spacing between dwellings is similar to adjacent properties and respects the rural character and street scene of the locality.</i> <p><i>Planning permission will not be granted where a proposal harms or undermines the existing relationship of the settlement within the open countryside, where it does not contribute to the character and distinctiveness of the rural area, including the natural beauty of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.</i></p> <p>The problem with this section is that it creates an embargo on any small development unless it is within a “Settlement Boundary”. It identifies any location outside the Settlement Boundary as a development in the countryside even though there could or should be an opportunity for windfall locations which are adjacent to the boundary. It is accepted that there should be control over isolated homes in the countryside. This policy DM1 however is in direct contravention with the advice provided in the NPPF which does not mention throughout the whole document “Settlement Boundaries” and which is not a commonly used term by other local authorities. NPPF discusses Isolated Homes in the Countryside and does not use the terminology “outside settlement boundaries”.</p> <p>Within the NPPF</p> <p>Para 16 identifies that there is a legal requirement on councils to <i>be prepared with the objective of contributing to the achievement of sustainable development ;</i></p> <p>Para 22 uses the word alone “settlement” <i>new settlements or significant extensions to existing villages</i> <i>support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;</i></p> <p>Para 72(b) uses the word settlement <i>be adjacent to existing settlements, proportionate in size to them not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards.</i></p> <p>This refers to entry-level exception sites, suitable for first time buyers (or those looking to rent their first home),</p> <p>Para 85 says using the word settlement <i>Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.</i></p> <p>And</p> <p><i>The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.</i></p> <p>Para 120 says using the word settlement.</p>

*give substantial weight to the value of using suitable brownfield land within **settlements** for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*

It can be seen from the NPPF that all the uses of the word settlement refer to a group of properties but at no time does the word “boundary” occur. This indicates that the NPPF does not, even in the Green Belt or AONB, determine that development should be restricted other than it does indicate that isolated homes in the countryside should be avoided. This therefore indicates that a home or homes being built in isolation would not be acceptable. The reverse however suggests that infill developments would, perhaps under the heading of a “windfall” site be acceptable, great weight should be given to those within existing settlements but it does not specify within settlement boundaries. There are no NPPF written instructions regarding the number of existing properties, nor does it require that the properties should be in some sort of ribbon development.

To support this premise, Para 60 says

To support the government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Followed by in para 66,

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

(a) specific, deliverable sites for years 1 to 5 of the plan period ; and

(b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

And in sub paragraphs within para 69

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

(a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

(c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes

Whilst the paragraph (c) mentions settlements, it does not describe sites within a settlement boundary so the meaning is quite clear that this indicates a group of properties even within or close to a town or small village that may not fit the West Berks criteria.

Under the heading Rural Housing Para 79;

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

Paragraph 80 goes on to identify what the NPPF really means

*Planning policies and decisions should avoid the development of **isolated homes in the countryside** unless one or more of the following circumstances apply:*

For example in (e)

the design is of exceptional quality, in that it:

is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and

would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

Comment.;

It is easy to understand the concept of the West Berkshire policy which was first raised in the original plan in 2006. The question now is one of relevance going forward from 2023 to 2037. There is and will continue to be, pressure to develop residential properties and it is very obvious that these settlement boundaries are today obsolete because of those rules preventing any building. That includes those locations outside and perhaps adjacent to those settlement boundaries which might in the future come forward. The NPPF makes this premise very clear. The infilling having ten or more existing houses as described in the local plan rules, along with a requirement to be adjacent to a highway would continue to prevent any opportunity for small developments. It is thus failing to support our local building industry and their local workers. It is also contrary to the spirit of the NPPF The council has overcome the red line boundary on virtually every of the new locations that are provided for major development by simply drawing a new boundary line and extending the original. Whilst these are included within the policy document these are all developments undertaken by national builders with little return to the local economy during construction. When the Authority take their CiL and S106 and finally when it starts to take council tax there is a return but support for a local builder would provide the profitability which retains that local industry and maintains a team of tradesmen who live and spend locally.

It should be borne in mind that even though the wording reads “*Exceptionally new residential development outside of adopted settlement boundaries will be permitted.*”, the planners do tick boxes when deciding

	<p>an application, with no recourse against the decision other than the applicant going on to appeal to the Inspector.</p> <p>It is agreed and the NPPF is quite clear that planning policies should be “Plan Led” but there are also opportunities for successful small developments which are in tune with the needs of small communities. It is so often the case that local fibre broadband is out of reach of small groups of homes even when close to boundaries due to the perceived viability by the providers and a couple of extra homes might tip the scales.</p> <p>This argument is sound and the paragraph should be rewritten to bear in mind the points raised above and be less onerous on small developers or builders who have the opportunity to develop and enhance smaller communities that already exist. The rules for isolated homes should still apply but within the description which has been tested in the high court and which is described in the NPPF.</p> <p>Proposal for a more fair and suitable revision to that section in DM1....</p> <p>Development proposals for new housing outside of Settlement Policy Boundaries will only be permitted where they are:</p> <p>Small scale residential proposals (Four dwelling or fewer (net)) of a scale and type that meet a locally agreed need provided that:</p> <ol style="list-style-type: none"> 1 <i>It is well related to the existing settlement and would not result in an isolated form of development; and</i> 2 <i>The development will respect the qualities of the local landscape and be sympathetic to its character and visual quality; and</i> 3 <i>The development will respect and relate to the character, form and appearance of surrounding development, and respect the amenities of the residents of neighbouring properties;</i>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The Planning Policy department within WBC are fairly fixed in their outlook towards the documentation that they champion and are very reluctant to listen to alternative proposals.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bradfield College (Represented by Lucy White Planning)
Consultee Full Name	Julia Bond
Consultee Organisation	Bradfield College
Agent Full Name	Lucy White
Agent Organisation	
Comment ID	PS18
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside

Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	23/02/2023 10:05:37
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comment.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<ol style="list-style-type: none"> 1 The supporting text to Policy DM38 (Development on Existing Educational and Institutional Sites in the Countryside) refers to Policy DM1 as relevant in the consideration of applications for staff accommodation in locations in the countryside, <u>in terms of infill</u>. Bradfield College supports the recognition through Policy DM38 that residential schools and colleges have a need for staff housing within or close to the campus to enable certain staff to fulfil their role within the boarding school/college. 2 Bradfield College is a full boarding school, with weekend and evening programmes. In order to ensure, the health, safety, security and well-being of pupils, the College needs to house a significant number of staff on site. It is also essential that sufficient staff live on-site in order to fulfil academic, pastoral and co-curricular demands, including duties outside the normal teaching timetable.

	<p>3 The demands placed upon staff continue to increase as the regulatory requirements and expectations in relation to Health and Safety, Security and Child Protection are raised.</p> <p>4 The success of the College is in large part attributable to its sense of community which has been established through the close relationships established between staff and pupils. The ability of staff to live on campus and be available to pupils day and night has made a significant contribution towards the success of the College. However, the College is unable to house sufficient staff on the College campus and it currently rents circa 20 properties in the wider area, which is sub-optimal and poses operational challenges.</p> <p>5 Although the College acknowledges the benefits of the overarching strategy to locate new housing at existing main urban areas to achieve sustainable patterns of development, the plan should acknowledge that where established residential schools, colleges and institutions can demonstrate a need for additional staff accommodation and the benefits associated with its provision within or in close proximity to the campus, a specific policy exception should allow for infill and small-scale redevelopment of existing residential areas outside the defined settlement boundaries.</p> <p>6 As drafted, Policy DM1's policy exceptions to new residential development outside of adopted settlement boundaries do not include housing for staff at existing educational or institutional sites. The exception for housing to accommodate rural workers is limited to workers associated with agricultural, forestry and other land based rural businesses (paragraph 11.43)</p> <p>7 Criteria h of Policy DM1 only allows for limited residential infill in settlements in the countryside with no defined settlement boundary. The policy does not expressly allow for such infill proposals where settlement boundaries are in place, such as Bradfield.</p> <p>8 As a result Policy DM1 provides no policy support for new staff housing to meet the needs of Bradfield College beyond the defined settlement boundary of Bradfield, despite the availability of existing College staff housing outside the settlement boundary which would be eminently suitable for infill development and replacement dwellings and the acknowledgment under Policy DM38 that circumstances may justify staff housing beyond the existing settlement boundaries.</p> <p>9 To be consistent with paragraph 82d of the NPPF (2021), the Local Plan should be flexible enough to accommodate needs not anticipated in the plan, allowing for new and flexible working practices (such as live-work accommodation). Accordingly, an additional criteria for staff housing specific to schools, colleges and other residential institutions should be incorporated into Policy DM1 to clarify its application in respect of Policy DM38 and to allow for infill development beyond settlement boundaries to meet the needs of rural residential institutional settings for staff accommodation.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	No comment.
<p>4. Proposed Changes</p>	<p>1 As drafted, Policy DM1's policy exceptions to new residential development outside of adopted settlement boundaries do not include housing for staff at existing educational or institutional sites. The exception for housing to accommodate rural workers is limited to workers associated with agricultural, forestry and other land based rural businesses (paragraph 11.43)</p> <p>2 Criteria h of Policy DM1 only allows for limited residential infill in settlements in the countryside with no defined settlement boundary. The policy does not expressly allow for such infill proposals where settlement boundaries are in place, such as Bradfield.</p> <p>3 As a result Policy DM1 provides no policy support for new staff housing to meet the needs of Bradfield College beyond the defined settlement boundary of Bradfield, despite the availability of existing College staff housing outside the settlement boundary which would be eminently suitable for infill development and replacement dwellings and the acknowledgment under Policy DM38 that circumstances may justify staff housing beyond the existing settlement boundaries.</p> <p>4 To be consistent with paragraph 82d of the NPPF (2021), the Local Plan should be flexible enough to accommodate needs not anticipated in the plan, allowing for new and flexible working practices (such as live-work accommodation). Accordingly, an additional criteria for staff housing specific to schools, colleges and other residential institutions should be incorporated into Policy DM1 to clarify its application in respect of Policy DM38 and to allow for infill development beyond settlement boundaries to meet the needs of rural residential institutional settings for staff accommodation.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To explain the importance of amendments to Policy DM1 to support and enable the delivery of new staff accommodation for independent boarding schools and colleges in the rural areas of West Berkshire.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Musgrave and Begley, M&W (Represented by Fisher German LLP)
Consultee Full Name	Mr M and W Musgrave and Begley
Consultee Organisation	
Agent Full Name	Angela Brooks
Agent Organisation	Fisher German LLP
Comment ID	PS152
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	14/02/2023 14:36:00
Attached Files	Fisher German obo MusgraveandBegley
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This consultation response has been prepared by Fisher German on behalf of our clients Mr M Musgrave and Mr W Begley in respect of their land adjacent to Oxford Road, Chieveley, as illustrated in the attached.</p> <p>The land, which extend to circa 6.58ha, is located to the east of Chieveley. The site is defined by residential development and Graces Lane to the south, Oxford Road to the east, residential development and East Lane to the north and a field to the west. The site benefits from mature boundary planting and forms a logical infill location close to the centre of Chieveley.</p> <p>These representations follow the order of the policies within the Submission Plan, wherein we have not commented we have no specific comments at this stage. If you have any questions regarding these representations, please contact the author.</p> <p><i>Extract of response relevant to consultation point:</i></p> <p>Whilst we broadly support Policy DM1, we consider a further criterion must be added to ensure the Plan is as flexible and robust as possible. Whilst there is an allowance for rural exception sites, we consider that this policy does not go far enough in that it only relates to affordable housing need. Clearly there may be market housing need in any given settlement, and it is considered unfair and prejudicial that by not qualifying for affordable housing this would preclude people from having access to suitable housing in their chosen area. Smaller settlements do not always have suitable market housing available for sale at any time, so this cannot be used as justification for such an approach. It is considered that market and affordable housing needs could exist in a given settlement and should be treated equally, or this would serve to unfairly treat the housing need associated for those who would not qualify for social housing, but equally may have legitimate housing needs that otherwise would not be satisfied.</p> <p>To manage such a criterion, there could be a requirement that any such scheme must be supported by appropriate evidence, for example a housing needs survey. If there is a need for market housing, it could be a requirement that it must be demonstrated that there is not appropriate accommodation for sale. This approach ensures that market housing is not built unduly and is considered fair, ensuring that the Plan remains flexible and is able to respond to emerging rural housing needs throughout the Plan period. This approach would also assist the Council in meeting its high windfall targets.</p> <p><i>For full response please see attachment.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hermitage Parish Council
Consultee Full Name	Nicky Pierce
Consultee Organisation	Hermitage Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS384
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 10:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>HPC does not feel competent to provide such detailed comments on proposals for other parishes; but we would like to express our support for the following overarching policies:</p> <ul style="list-style-type: none"> DM1 Residential Development in the Countryside, because this will reduce settlement creep between communities and associated harm to the countryside.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Gallagher, Terence (Represented by Bluestone Planning)
<p>Consultee Full Name</p>	Mr & Mrs Terence Gallagher
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	Jeremy Flawn

Agent Organisation	Bluestone Planning
Comment ID	PS371
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 09:27:00
Attached Files	Jeremy Flawn (Mr and Mrs Gallagher) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>Extract of response relevant to consultation point</i>

	<p>Policy DM1 (Residential Development in the Countryside) now states that outside of settlement boundaries, some new residential development will be permitted, but in exceptional circumstances where the proposal will need to meet one of more of the listed criteria:</p> <ol style="list-style-type: none"> 1 Sites allocated as part of the development plan; 2 Sites for Gypsies and Travellers and Travelling Showpeople; 3 Rural exception housing and/or First Homes exception sites; 4 The conversion of redundant or disused buildings; 5 Housing to accommodate rural workers; 6 The extension to or replacement of existing residential dwellings; 7 The subdivision of existing residential dwellings; or 8 Limited residential infill in settlements in the countryside with no defined settlement boundary where: <ol style="list-style-type: none"> 1 It is within a closely knit cluster of 10 or more existing dwellings adjacent to, or fronting an existing highway; and 2 The scale of development consists of infilling a small undeveloped plot commensurate with the scale and character of existing dwellings within an otherwise built up frontage; and 3 It does not extend the existing frontage at either end; and 4 The proposed plot size and spacing between dwellings is similar to adjacent properties and respects the rural character and street scene of the locality. <p>Whilst this policy extends circumstances in which development may be acceptable, it does not consider the circumstance of sites which are outside of, but very closely related to, settlements which do have settlement boundaries. It only addresses those settlements without defined boundaries whereas, in many cases, sites at higher order settlements located close to the settlement boundary will be far more sustainably located than sites in more remote settlements.</p> <p>Despite this, such properties will still be treated as being located in the countryside even though they would have more sustainability credentials than many of the 'exceptions' listed in criteria a-h of policy DM1.</p> <p>The combined effect of both policies SP1 and DM1 will still be to draw very tight boundaries around existing built parts of settlements and exclude sites which may well be more sustainable and closely related to services and facilities within those settlements than other sites that are actually within the settlement boundary. Such sites will often have none of features that are characteristic of sites which are found in the 'open countryside'.</p> <p><i>For full response see attachment.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To discuss the merits of the settlement boundary matters
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Purley on Thames Parish Council

Consultee Full Name	Christopher Thompson
Consultee Organisation	Purley on Thames Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS508
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	Yes

* Yes * No	
Please give reasons for your answer	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	After a revised period, consultation was advised
4. Proposed Changes	None - we would ask the planning authority to take into account the attached observations
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS887
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant?	

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point. DM1 – RESIDENTIAL DEVELOPMENT IN THE COUNTRYSIDE There is nothing to protect the Extension of smaller Bungalows into large dwellings and as these are ideal for Rural families that wish to stay together or the elderly and disabled that wish to remain in the Countryside.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes	Yes

* No	
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tim North & Associates Limited
Consultee Full Name	Tim North
Consultee Organisation	Tim North & Associates Limited
Agent Full Name	Tim North
Agent Organisation	
Comment ID	PS521
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 19:20:34
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Local Plan Review (LPR) strategy where it relates to specialist older persons accommodation has not been positively prepared, is neither justified nor effective, nor is it consistent with national policy. Policies SP18, DM1, DM4, and in particular Policy DM19 of the LPR when read as a whole have not fully taken into account the fact that the population of older people in England is growing rapidly, with the consequence that ensuring future housing supply is met on the basis of <i>"Lifetime Homes Standards"</i> will not of itself be either suitable or capable in meeting the accommodation requirements of various types of specialist older households.</p> <p>The need to consider specialist older persons accommodation in adjoining authorities to assess the extent to which they can meet their own requirements; considerations relating to changes in the type of care home accommodation; attrition levels seen in terms of the reasons behind the closure of care homes; viability issues which can result in substantially different characteristics relative to general housing, and lessons to be learnt from the recent Covid-19 pandemic, with consequences for the design and access to communal open space of specialist older persons accommodation; all play an important role in the need for, and hence the likely future provision of this form of housing. It is contended that these material considerations effecting specialist older persons accommodation have not been fully met in the policies in the LPR, being considered in greater detail later in these representations.</p> <p>The ONS 2019 Mid-year population estimates indicate that over the past 20 years (1998-2018) the number of residents aged 65 and over in England increased by approximately 31%; more than double the rate of growth than the total population over the same time period (15%).</p> <p>This ageing trend is expected to accelerate in that the 2018 base i.e. the ONS 2019 National Population Projections, reveal that the older population in England could increase by some 41% over the 20 year period between 2018 and 2038, meaning that by 2034, almost 1 in 4 (24%) of the population in England are expected to be aged 65 or over. The rate of growth in West Berkshire over the period 2022 to 2039 for residents aged 75 or over, is projected to increase by 64%.</p> <p>Current national policy as set out at paragraph 62 of the NPPF 2021 requires local planning authorities to consider inter alia:-</p> <p><i>"... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including but not limited to, those who require affordable housing, families with children, <u>older people</u>, students, people with disabilities ..."</i> (my emphasis)</p> <p>The NPPG at paragraph 001 Reference ID: 63-001-20190626 states</p> <p><i>"The need to provide housing for older people is critical."</i> (underlining as per the NPPG; my emphasis)</p> <p>Government guidance concerning older persons specialist housing refers to there being a <i>"critical need"</i>, a term absent when describing all other forms of housing need, emphasising the importance to be attached to specialist older persons housing provision.</p> <p>The Guidance goes on to explain in paragraph 006 Reference ID: 63-006-20190626 that :-</p> <p><i>"... These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or arrange for the number of units of specialist housing for older people needed across the plan area throughout the plan period."</i> (my emphasis)</p> <p>Whilst paragraph 013 Reference ID: 63-013-20190626 states:-</p> <p><i>"It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers, and encourage the</i></p>

provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation)."(my emphasis)

The same NPPG sets out at paragraph 010 Reference ID: 63-010-20190626 the different types of specialist housing for older people; all of which have differing consequences seen in terms of delivery; whilst the contents of paragraph 016 Reference ID: 63-016-20190626 are of relevance, highlighting the fact that:

"Decision-makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people... Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need."(my emphasis)

The West Berkshire Housing Needs Assessment Update published by Icen Projects Ltd on behalf of your Council states in paragraph 5.35

"It can be seen by 2039 there is an estimated need for 1,137 additional dwellings with support or care across the whole study area. In addition, there is a need for 1,032 additional nursing and residential care bedspaces. Typically for bedspaces it is conventional to convert to dwellings using a standard multiplier (1.80 bedspaces per dwelling for older persons accommodation) and this would therefore equate to around 573 dwellings. In total, the older persons analysis therefore points towards a need for around 1,710 units over the 2021- 39 period (95 per annum) – the older person need equates to some 19% of all homes needing to be for some form of specialist accommodation for older people."

These provisions are similarly reflected in the Housing Background Paper prepared by your Authority in January 2023.

I have previously referred in these representations to a proposed 64% change in the population of older persons of 75 years + between 2021 and 2039. This figure has to be examined in the context of the need for specialist housing for the elderly set out in paragraph

The LPR is to seek "specialist accommodation" as an integral part of the strategic housing allocations at Sandleford Park and North East Thatcham. The only specialist older persons accommodation being proposed is an Extra Care scheme on land at Stonehams Farm, Tilehurst, being the only allocated site for specialist elderly persons accommodation to 2039.

During the nine-year period commencing 2013/14 leading up to 2021/22, a total of 227 Class C2 rooms were completed, amounting to five schemes, of which 204 comprised three individual schemes in Newbury, revealing why it is considered that either further allocations should be made for specialist older persons housing, and/or the need for flexibility in the location of such specialist housing schemes in Policy DM1.

The Housing White Paper "Fixing Our Broken Housing Market" published by DCLG in February 2017 recognised the importance of "offering older people a better choice of accommodation" at the same time highlighting that "helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers." It is noted that the same White Paper recognised the "barriers to people moving out of family homes that they may have lived in for decades" and the "emotional attachment ... which means that where they are moving to needs to be very attractive to them and suitable for their needs over a twenty to thirty year period.." The Housing White Paper clearly expresses the Government's commitment to "exploring these issues further and finding sustainable solutions to any problems that may come to light."

The Government launched a Select Committee Inquiry into the issue of housing for older people in response to the House of Commons Communities and Local Government Committee (2018). The Inquiry report published in February 2018 aimed to reflect the diversity of older people in terms of their ages, individual circumstances, choices and preferences. It concluded inter alia that:

- A national strategy on housing provision for older people is needed, and should be introduced in consultation with older people and those who provide for them;
- Independent research should be commissioned on the wider housing market impact of older people moving to a smaller home that better suits their needs, to further explore frequent claims that this could be part of the solution to tackling the housing shortage;
- National planning policy should give greater encouragement to the development of housing for older people, ensuring that sites are available for a wider range of developers;
- The new standard approach to assessing housing need should explicitly address the complex and differing housing needs of older people;
- Older people should be able to choose from a wide choice of housing which can accommodate their needs and preferences, including smaller general needs housing, accessible housing, retirement homes, extra care housing and cohousing;
- Local authorities should produce strategies explaining how they intend to meet the housing needs of older people, with Local Plans identifying a target proportion of new housing to be developed for older people as well as suitable well-connected sites close to local communities; and
- Local authorities should be more receptive to private developers who wish to build housing for older people in their area, and appreciate the potential health and wellbeing benefits leading to reduced need for health and social care

Knight Frank in their 2021 Research Paper entitled "Health Care Development Opportunities" found that the UK health care market needs upgrading, with 71% of homes older than 20 years; at least 40% of homes having been converted from other uses and many be outdated, with 29% of beds lacking en-suite facilities. They forecast that the Covid-19 pandemic was likely to accelerate the closure of outdated homes and replace them with high quality assets. They went on to add that the Covid-19 pandemic would no doubt prompt a change in the way care homes are designed and configured, with particular emphasis placed on internal circulation, air quality and ventilation, with further focus directed towards transitional and communal space, with a view to maintaining an element of social distancing. A similar shift in preferences with greater attention is anticipated in respect to important outdoor and breakout spaces.

Levels of attrition involving the closing of care homes needs to be assessed in the future, with the average size of newly registered care homes across the country, i.e. those constructed in the last 56 years being 62 beds, contrasting with the average size of care homes closing over the same time period amounting to 29 beds.

It is also important to consider that there are a number of factors which affect the viability of developments relating to specialist housing for older people, one of the most significant being that they incorporate a significant provision of communal space and on-site facilities, in addition to individual rooms/units, and common parts evident in general need apartment blocks. As a result, the efficiency of age restrictive developments seen in terms of the floorspace of individual units (net) to the total floorspace (gross) is significantly poorer than in traditional or general needs housing. In short traditional general needs housing uses 100% in terms of net:gross efficiency, with a figure of 84% net:gross efficiency envisaged for apartments. Care homes, Extra Care facilities and sheltered living/retirement living apartments in contrast are only able to achieve between 40 and 75% net:gross efficiency.

In addition to these design considerations, there are higher construction costs, with greater requirements in terms of achieving higher accessibility requirements, comprising lifts, specially adapted bathrooms, treatment rooms, with those providing these important facilities relying on third party building contractors who are unable to secure the same economies of scale as volume housebuilders.

To these considerations should be added slower sales, given they are directed at a specialist older persons market, with the inability to phase flatted schemes to sales rates, resulting in higher finance costs for developments.

It is for a combination of these reasons that it is contended the LPR needs to be more proactive in delivering development to meet specialist older persons housing, which it is contended is not being met through the allocation of sites to meet these specialist housing needs. If this process is not addressed, with authorities relying on the market to bring forward sites, with viability assessments at the decision-taking stage, it is considered less likely that sites will come forward for this much needed use, although this situation can be alleviated by incorporating into Policy DM1 an exception in respect of specialist older persons housing subject to a quantitative and qualitative need accompanying any such submission.

These considerations which affect specialist older persons housing were accepted by the Inspector Harold Stephens in an appeal decision concerning land at Sonning Common (PINS Ref. No. APP/Q3115/W/20/235861), viz:-

"117. Extra care housing undoubtedly operates in a very different market. Mr Garside provided detailed evidence to the inquiry how the market for land operates to the detriment of extra care operators. Extra care housing providers cannot compete with house builders or with other providers of specialist housing for older people because of the build costs, the level of the communal facilities and the additional sale costs including vacant property costs. The communal facilities must be provided before any units can be sold and sales tend to be slower. However, I accept that extra care schemes can charge a premium for the specialist accommodation provided and also benefit from an income from deferred management fees.

1 It seems to me that these factors, all mean that age restricted developments and in particular extra care communities are less viable than traditional housing schemes. Ultimately, age restricted developers are less able to pay the same price for land as residential developers and it is much harder for age restricted developers; and in particular those seeking to deliver extra care, to secure sites for development and meet the housing needs they aim to supply. Viability is clearly a relevant factor which supports the case under paragraph 172b) of the NPPF. There is also a strong case for the appeal scheme given the lack of alternative sites in the light of Policy H9 of the SOLP."

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>There is a need in the evidence base to provide a detailed assessment of the different types of specialist housing for older people, which for various reasons cannot be successfully accommodated in adjoining authorities, in order to evaluate whether there are certain diverse links for older persons accommodation which are more likely to be met in West Berkshire. To consider housing solely from a generic basis where the form of housing is in critical need is not considered satisfactory, and more importantly, will only exacerbate the need in the future for older persons accommodation.</p>
<p>4. Proposed Changes</p>	<p>There is a need to adopt a more flexible approach towards specialist housing for older people, for which the Government confirms there is a critical need, so that emphasis can be placed on ensuring that their requirements are met, in the same way as is the case for the housing needs of travellers. Both travellers and older people comprise different groups within the community which are required to be assessed and reflected in planning policy, in accordance with paragraph 62 of the NPPF 2021.</p> <p>This means encompassing specialist housing for older people as a category which exceptionally may be provided as a form of residential development in the countryside, in accordance with Policy DM1, subject to a quantitative and qualitative need being shown. The significance of this proposed policy change is evident in appeal decisions where care proposals, both Extra Care and care homes, are being allowed in the countryside in locations not normally considered acceptable in planning terms, such as in the Metropolitan Green Belt; Area of Outstanding Natural Beauty and sites on the edges of small villages, as well as next to listed buildings and conservation areas. This is a reflection of Inspectors consistently recognising the national imperative of providing more care facilities in the light of the very clear instruction that the need is now critical. It is also the fact that a number of local authorities are failing to properly address or recognise that need.</p>

	<p>There is also a requirement to look at the qualitative need for specialist housing for older people, meaning an examination of the District's current care home stock, which includes converted buildings, along with attrition rates, i.e. the loss of care home facilities. The requirement in this respect should be based on an appropriate standard room, being a single occupancy room with en-suite toilet, wash basin and flat floor shower, i.e. a wet room, the latter being particularly important to avoid the risk of elderly people tripping or falling in the shower. It also requires a shower stool or seat to be placed within easy access in the shower. The appropriate standard in this respect is that envisaged by the Care Act 2014 Section 5 paragraph 1(b).</p> <p>This requirement is now all the more persuasive following the shocking evidence of those who have passed away in care homes due to the Covid-19 pandemic. It is not difficult to see why when so many people who passed away lived in accommodation focused on sharing facilities, which, post Covid, is now completely unacceptable. The extent to which there is an appropriate standard of accommodation should dictate the need in the future for all forms of specialist older persons housing in the LPR. In addition, there is a need to carry out an assessment as set out in answer to Question 3 above.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1279
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Due to the number of constraints on development (AONB, AWE DEPZs, floodplains, nutrient neutrality zones) resulting in a serious shortage of available suitable land in settlements, also given the major changes in living, travel and working habits occurring in rural areas with the roll-out of the internet and EV charging, there would seem to be a reduced need to control development in the countryside.</p> <p>Major changes in agriculture are also almost inevitable as a result of climate change, BREXIT and the need for food security, but alongside a more environmentally friendly and low carbon input food production system. Whilst agriculture and food production is outside the remit of LPAs and the wider spatial planning system, these changes are bound to lead to new opportunities for employment in businesses that form part of the food chain. This will lead to pressure for housing associated with these rural businesses and while overwhelmingly new housing will be within existing settlements, there may be a need for housing close to businesses outside settlement areas.</p> <p>Therefore, we feel there is no justification for a policy that prevents almost all housing development in the countryside if it is deemed to cause any harm in the relationship between settlements and countryside. We wish to only prevent significant harm and to give great weight to development that can be shown to be self-sufficient and not lead to significantly more need to travel and is exceptionally well designed, as stated already in 9.6.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A

4. Proposed Changes	In the last paragraph of DM1, insert “significantly” before “harms” in line 1 and before “adverse” in line 4.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To explain our whole somewhat more relaxed approach to development in the countryside “(see also responses to DM23/24/35). (Comment ID: 1282/1283/1285)
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1780
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>It is noted that draft LPR Policy DM1 has been amended to state that 'exceptionally, new residential development outside of adopted settlement boundaries will be permitted' instead of 'there will be a presumption against new residential development...' as set out in the previous Reg 18 draft LPR. This more positive approach is broadly welcomed in line with reflects NPPF paragraph 16, however it is recommended that 'exceptionally' is deleted on the basis of the criteria which are already set out and in order to ensure that appropriate rural development is not unduly prohibited.</p> <p>As referred to above, the Council has also undertaken a review of settlement boundaries across the District, as set out in the Settlement Boundary Review Background Paper (December 2022) and summarised in the LPR Appendix 3, in order to inform where Policy DM1 is applied. Whilst the Settlement Boundary Review Background Paper (December 2022) includes reference to the consideration of Englefield, it is not clear that the conclusions are based on a detailed assessment or applying the identified criteria for reviewing settlement boundaries. As explained above and in our previous representations, it is our view that a settlement boundary should be identified at Englefield to facilitate sustainable development within the village. It is also recommended, with regard to the criteria set out at LPR Appendix 3, that adopted settlement boundaries are drawn to allow flexibility for appropriate limited future expansion and to thereby support 'opportunities for villages to grow and thrive' (NPPF paragraph 79).</p> <p>Given the predominantly rural character of the District, it is crucial that adequate provision is made for development in the countryside in order to meet rural needs. This is reflected in paragraphs 78-79 of the NPPF which encourage sustainable development in rural areas to meet local needs and to enhance the vitality of rural communities. The exceptions which are set out at parts a-i of draft Policy DM1 provide additional clarity to that of Policy C1 of the HSA DPD (which would be superseded by Policy DM1) and generally reflect the provisions of NPPF paragraph 80. It is however recommended that part e is amended to include reference to 're-use' of redundant or disused buildings, in line with NPPF paragraph 80, in order to clarify that existing buildings can be brought back into use as well as being converted to a different use.</p> <p>The amendment to draft Policy DC1 for all developments to 'contribute' rather than necessarily 'enhance' the character of the rural area is welcomed and will help to ensure that appropriate development will come forward to meet the needs of the rural area whilst continuing to protect its character.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes

Please give reasons for your answer	
4. Proposed Changes	<i>The following changes are recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35: 'Exceptionally, n New residential development outside of adopted settlement boundaries will be permitted.' "e. The conversion <u>or re-use</u> of redundant or disused buildings"</i>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chieveley Parish Council
Consultee Full Name	Kim Lloyd
Consultee Organisation	Chieveley Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1497
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Policy DM1 seems to be one of the most profound re-writes of policy in the Proposed Submission Local Plan compared to the 2020 Emerging Draft (where it was Policy DC1). The main change is to a long-standing Policy West Berkshire for there to be a presumption against new development outside of adopted settlement boundaries (Policy DC1, 2020) to an apparent presumption in favour of residential development outside of settlement boundaries (DM1, 2023: <i>... new residential development outside of adopted settlement boundaries will be permitted (even if exceptionally)</i>).</p> <p>Chieveley Parish Council objects to this change which is not in accordance with national policy and not justified. In addition, and irrespective of whether the policy is worded as a presumption against or a presumption in favour, this Council also objects to the weakening of the specific criteria where residential development outside of settlement boundaries will be permitted.</p> <p><u>Not in accordance with National Policy</u></p> <p>As now proposed, Policy DM1 is not in accordance with the NPPF. Paragraph 80 states: <i>Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply ...</i> i.e. that's worded as a presumption against, not in favour (as now in DM1).</p> <p><u>Not justified</u></p> <p>The structure and effect of NPPF Para 80 is clear and there is no justification for it to be reversed in West Berkshire.</p> <p>The principle of NPPF Para 80 is not new. Paragraph 55 of the NPPF 2012 was, in this regard, substantively the same: <i>Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances ...</i> There is no national policy change that requires the change made at DM1 to be made.</p>

	<p>The comments received on Policy DC1 as reported in the 'Consultation Statement for the Proposed Submission West Berkshire Local Plan Review 2022-2039 December 2022' were in the vast majority supportive of Policy DC1.</p> <p>Some concern was expressed about the effect of Policy DC1 being overly restrictive in smaller villages without settlement boundaries. If that is the concern, it would be quite easy to address that by framing one of the exceptions under Policy DC1 to apply to smaller villages where the settlement boundary-type criteria can be met, even if there is no actual settlement boundary; and/or more positive wording for Policy DC1 (2020) exception (l). It does not justify the profound changes to policy as set out in DM1 as a whole.</p> <p>The general exception in Policy DM1: <i>exceptions to this are solely limited to development which is appropriately designed and located</i>, lacks clarity because there are no criteria to what 'appropriately designed and located' means. Paragraph 80 of the NPPF and Policy DC1 are clearer.</p> <p>We acknowledge the need to allocate sites for Gypsies, Travellers and Travelling Showpeople but these should be allocated in accordance with other policies in the plan including Policy DM20 and not subject to an exception to policies restricting isolated dwellings in the countryside as now included in Policy DM1. Exception (b) - permitting sites for Gypsies and Travellers and Travelling Showpeople, should continue to be tied to other policies, as it was in DC1.</p> <p>A presumption in favour of permitting individual dwellings in the countryside will have a negligible effect on the rural economy (that being already covered by Policy DM2), or the viability of settlements, however it will have a cumulative impact on the countryside and the AONB. The final sentence of Policy DM1 '<i>not be granted where ... would have an adverse cumulative impact on the environment ...</i>' Will not prevent this as the cumulative impact on the AONB will result from the policy and not be capable of assessment on individual proposals.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Revert to Policy DC1 in the Emerging Draft of 2020.</p> <p>The exceptions (b) to (g) should continue to relate specifically to the other relevant DM policies (i.e. DM20, DM17, DM24, DM23, MD25, DM26and MD27).</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to ensure the reasons for these views on the transposition of national policy into the Local Plan are understood.</p> <p>We may be able to explain further with reference to specific examples.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Hathor Property Limited (Represented by Bell Cornwell LLP))</p>
<p>Consultee Full Name</p>	<p>Fred</p>

	Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Brigid Taylor
Agent Organisation	Bell Cornwell LLP
Comment ID	PS1247
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	PS1247 Bell Cornwell obo Hathor Property attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	<p>This policy should be amended to support delivery of infill development or self or custom build plots in edge of settlement locations adjacent to settlement boundaries where the development would have an appropriate relationship to the existing form and pattern of development.</p> <p>The policy allows for infill within settlement boundaries. In the case of our client's site in Brimpton, development would have all the features of infill, and would be supported were it in the boundary or in a village without a boundary. It would not, however, qualify at present due to the Council's decision not to amend the settlement boundary to follow the natural form and pattern of the settlement. Please also refer to separate comments made on the Settlement Boundary review (in relation to Policy SP1).</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>Amend settlement boundary to bring our client's site into the settlement at Brimpton, to allow for small scale infill development to meet local needs. The site is encompassed within the settlement, with residential dwellings to the north, west, south and part of the western boundary. As such the site is well contained, and realignment of the boundary would not give rise to any risk of continued encroachment into the countryside. There is support for small scale additional development in the village to support the local primary school, which is within walking distance of the site.</p> <p><for map see attachment></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1443
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1499
Chapter / Policy / Appendix Number	Policy DM 1
Chapter / Policy / Appendix Title	Residential Development in the Countryside
Order	149
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework.</p> <p>Policy DM1: Residential Development in the Countryside, sets out a number of criteria for development outside adopted settlement boundaries.</p> <p>Exceptions include the conversion of redundant or disused buildings, extension or replacement of existing dwellings, subdivision of existing dwellings and limited residential infill in settlements in the countryside with no defined settlement boundaries (criteria h).</p> <p>In order to meet criteria h, new dwellings must be within a closely knit cluster of 10 or more existing dwellings, adjacent to, or fronting an existing highway. Whilst this policy affords limited development in areas outside defined settlement boundaries, it is somewhat in conflict with Policy SP3.</p> <p>Criteria i) of Policy DM1 is a permissive policy which encourages appropriate growth. However, this is contrary to the restrictive settlement boundary approach at Policy SP3. The provision of limited infill should extend to sites that are beyond the defined development boundaries at the identified settlements where the development of a site would comprise sustainable development. The policies are more permissive of speculative development in unsustainable locations than development adjoining an arbitrary settlement boundary.</p> <p>The Council's evidence sets out that the villages and towns identified in policy SP3 are clearly sustainable and appropriate growth is supported; however the restrictive nature of the settlement boundaries and accompanying policies preclude appropriate growth in sustainable locations where there is no identified harm.</p> <p>Important to this point is an appeal decision (3262431) for new dwellings in South Cerney, Gloucestershire. These two dwellings were outside the settlement boundary, but sustainably located. The strategic policy in this case sought to prevent new market housing outside settlement boundaries to prevent new build market houses in the countryside. The Inspector considered that the site was in an accessible location within the village, albeit outside the defined development boundary. The development was considered to be appropriate housing growth in an accessible location without causing harm.</p> <p>At present, the policy as worded would prevent development that is in an accessible location due to the arbitrary boundary.</p> <p>It is suggested that Policy SP3 is updated to reflect the provisions afforded for development at villages without settlement boundaries (by Policy DM1) for sites that are at villages/towns/settlements that have a settlement boundary but lie outside the defined boundary.</p> <p>It is also suggested that the redevelopment of previously developed land at sites that are well related to identified settlement boundaries are supported.</p> <p>In addition, it is also suggested that opportunities for development in sustainable locations which provide landscape enhancements are supported. This would reflect the three overarching objectives by</p>

	<p>encouraging improvements to landscape character, optimising the opportunities to develop previously developed land and make the best use of land.</p> <p>In short, settlement boundaries are a blunt instrument and a level of flexibility, as afforded by policy DM1, would ensure the plan is positively prepared and would support appropriate sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Policy DM1 should be amended to include:</p> <p>'i) Outside defined development boundaries but within and/or well related to settlements with defined development boundaries, limited residential infill and the redevelopment of previously developed land will be supported provided that the development:</p> <ul style="list-style-type: none"> • Is sustainably located and accessible; and, • Comprises small scale development that reflects the character of the existing settlement and surrounding area; and, • Is of an appropriate density that reflects the character of the area; and, • Is in accordance with all other relevant policies of the development plan.'
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Policy DM 2

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS623
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 36. Policy DM2. A settlement boundary has to be retained between Theale and surrounding villages in order for Theale and its neighbours to retain their individual characters.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Gladman Developments Ltd
<p>Consultee Full Name</p>	Mr Josh Plant
<p>Consultee Organisation</p>	Gladman Developments Ltd
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS727
<p>Chapter / Policy / Appendix Number</p>	Policy DM 2
<p>Chapter / Policy / Appendix Title</p>	
<p>Order</p>	150
<p>Submission Type</p> <p>* E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 14:38:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Gladman are concerned with the gap policy designations within Policy DM2 which have been proposed to prevent coalescence between Newbury/Thatcham and to maintain the separate identity of the settlements around both towns. Policy DM2 is not positively prepared, justified and effective in line with national policy and therefore the Local Plan cannot be considered 'sound' as currently drafted. The reasons for this assessment are set out in the following paragraphs.</p> <p>Firstly, the identification of settlement gaps will act to constrain the ability of sustainable development opportunities from coming forward in the district which is significantly constrained by various policy and physical designations. Around 74% of West Berkshire is designated as AONB with further significant ecological and historical designations. The Council have already proposed to allocate 10 development sites to accommodate approximately 334 residential dwellings in the AONB through Policy SP15 and need to identify further residential development sites to meet their identified housing needs and to provide flexibility in the delivery of housing over the plan period.</p> <p>Allocating areas of land as green gaps further restricts potentially sustainable development locations and effectively seeks to designate land as Green Belt by the back door, when they have already sought</p>

to direct development to the AONB, which is a legally protected landscape designated for the quality of its scenic beauty.

The Inspector currently examining the Bracknell Forest Local Plan stated in their Post Hearings Letter that the Strategic Gaps and Green Wedge policies in the plan did not add any value to the Plan and a main modification to Policy LP37 Landscape Character would provide adequate protection to the distinctive character setting of settlements (*footnote: Bracknell Forest Local Plan: Inspectors' Post Hearings Letter (EXAM61): <https://consult.bracknell-forest.gov.uk/file/6134773>*). This is in the context of Bracknell Forest considering that exceptional circumstances existed to amend Green Belt boundaries to enable residential development sites to be allocated.

In this context, Gladman consider that Policy DM2 is not positively prepared or justified and that it would be appropriate to delete the gap policies from the Local Plan. It is considered that Policy SP8 provides adequate protection for the character setting of settlements.

Secondly, the Council should be aware that it is an aspiration of Newbury Town Council to improve the transport and highway network within the town identifying a preferred solution for a new road from the western Sandeford development running east and south of Garden Close Lane before joining the A343 at Wash Water2 (Footnote: Newbury Town Plan 2019-2036 (Page 37) <https://www.newbury.gov.uk/media/v25hhpk1/newbury-town-plan-final.pdf>). Although a suggested route is not mapped within the document, it is apparent that this would involve development within the settlement gap. In this regard, West Berkshire Council should consider the implications of the policy on the future provision of a link road and delivering the local community's aspirations.

Finally, Gladman turn to the evidence base attempting to justify the proposed settlement gaps in Policy DM2. The supporting text highlights that the 'Appropriate

Countryside Designation Study (2022)' was undertaken to determine whether specific designations were required to safeguard characters and identities of settlements.

- The study is formed of a 3-step method comprising of:
- Study Area and Parcel Identification;
- Collect General Parcel Information; and
- Parcel Assessment.

The first step identifies 10 large parcels of land using physical features and administrative boundaries through a 3 step method before the second step involved collecting general information about the parcels such as size, location descriptors and whether there were any general designations such as ecological or historical assets.

Finally, the third step assessed the 10 parcels against the five Green Belt purposes identified in the NPPF and undertook an additional 'Green Gap/Wedge Assessment' using four parameters:

- To prevent coalescence/merging (perceptual and physical) of settlements by maintaining open land between them to protect the separate identity of the settlements;
- To guide development form (maintain existing or influence form and direction of urban development);
- Provide a 'green lung' into urban areas (i.e. penetrating from open countryside into an urban area); and
- Provide essential green infrastructure.

The assessment of Parcel 2 draws on the 'West Berkshire Landscape Character Assessment (LCA) (2019)' and 'Newbury Landscape Sensitivity Study (2009) Potential Strategic Development Sites'. The latter highlights that the housing at Enborne Row is, "...clearly separate at present from the Wash Common area of Newbury".

There is fleeting reference in the proforma and assessment in Appendix 2 of the document before pages 96 and 97 of the document propose a green gap designation despite the landscape notes highlighting that there are, "Few (or no views between the settlements due to topography and woodland".

There is no justification provided for the area of and proposed to form the settlement gap titled, 'Land between Newbury and Enborne Row/Wash Water' and no further assessment on the smaller area and parcels between Newbury and Enborne Row. Indeed, page 39 of the document highlights that the assessment is strategic level and does not assess the impact of individual development proposals utilising "...existing evidence and desktop review using GIS and relevant mapping and aerial imagery. Site visits were then conducted to verify the desktop assessments".

There is no landscape visual assessment undertaken and the site visit appraisals are ineffective given they were not undertaken from within the proposed designation boundary. It is considered that the evidence base justifying the designation is not robust.

Pegasus on behalf of Gladman alongside Donnington New Homes have produced a Landscape Appraisal for Land at Sandeford Park South, Newbury. The document undertakes a comprehensive landscape appraisal of the site and the surrounding areas including utilising view points from within the site.

The assessment highlights that beyond the settlement boundary of Newbury, there is a sense of rurality and this is achieved because there is little by way of visual connection with the adjacent settlements and in particular, Newbury and Wash Common to the north. This is in part due to the topographic profile, the gently undulating topography of the local landscape but also due to the significant presence of tree cover and woodland which forms a patchwork quilt across the countryside. The document is set out at Appendix 1 of this representation and highlights how development could be brought forward in keeping with the character and appearance of the local existing residential neighbourhoods and settlements. This would support the Town Council's link road aspirations and will not lead to coalescence issues.

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

* Yes
* No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hamilton, Steve (Represented by RPS)
Consultee Full Name	Steve Hamilton
Consultee Organisation	
Agent Full Name	Jim Bailey
Agent Organisation	RPS
Comment ID	PS1138
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 19:54:00
Attached Files	Jim Bailey (Steve Hamilton) REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This policy states that:</p> <p>In order to prevent the coalescence of Newbury and Thatcham and to maintain the separate identity of the distinct settlements around both towns, the following gaps between settlements have been identified and are outlined on the Policies Map:</p> <ol style="list-style-type: none"> 1 Land between Newbury and Thatcham <for map see attachment> <p>My clients land lies within the proposed “gap” between Newbury and Thatcham. The policy goes on to say that:</p> <p>Development which would detract from the open or rural character of these gaps will not be permitted. In these areas development will only be permitted where it:</p> <ol style="list-style-type: none"> 1 Would not diminish the clear physical and visual separation between distinct settlements; and 2 Would not compromise the integrity of the gap either individually or cumulatively with other existing or proposed development. <p>My client objects to this policy, because it seeks to sterilise and prevent development on land that is currently already protected by its countryside status in the adopted local plan. There is no need to add a further layer of constraint. Neither green gaps or wedges are recognised national policy designations, as neither are mentioned in Government guidance i.e. the NPPF and NPPG. Some local authorities choose to designate green gaps or wedges in order to protect land around and between settlements from development. West Berkshire has not designated green gaps or wedges in the past. There must have been a reason for that approach. Perhaps they felt they were not needed. In this context, the designation of the proposed gaps needs to be justified.</p> <p><for map see attachment></p> <p>The supporting text of policy DM2 states that:</p> <p>9.8 The overarching spatial strategy for the LPR set out in Policy SP1 focuses development on Newbury and Thatcham. This pressure for development has the potential to lead to the loss of the separate and distinct identity of both settlements and the settlements surrounding them through coalescence. This could either be by physically or perceptually reducing the gaps between them or by introducing an increase of activity which has an urbanising effect. The visual break and sense of openness between these settlements is very important in maintaining the separate identity of individual communities and the Council considers it important that the integrity of this openness is maintained.</p> <p>This text is flawed, because it is not a logical consequence of allocation of land for development, that other land between settlements will end up being put under pressure for development. Most of the land in the proposed gap between Newbury and Thatcham, to the south of London Road, currently consists of former gravel workings in the form of lakes and wet woodland, which is also a nature reserve and</p>

flood zone. The land is already protected by these designations and there is no need to add another layer of constraint, simply because nearby land is proposed for allocation and future development.

9.9 An Appropriate Countryside Designation Study (2022) was therefore undertaken of the countryside around Newbury and Thatcham to help determine whether a specific planning designation was needed to safeguard the unique characters and separate identities of the individual settlements. This concluded that should the Council specifically define the particular gaps it wanted to protect, that it would be justified in creating a new green gap policy.

An appeal decision in November 2021 concerning my clients site, is mentioned in the Countryside Designation Study (2022) at paragraph 5.4. The report authors state that:

This appeal case demonstrates that the area between Thatcham and Newbury is currently protected by specified policies relating to landscape character and by the LCA identifying the area as having a strong rural setting that plays an important role in maintaining the distinct separation between the two settlements. The proposed development was identified as having considerable economic benefits to the area, however, these did not outweigh the significant harms to the landscape character.

We consider that they have concluded, as the appeal inspector did, that the area between Newbury and Thatcham is already protected by local plan policies and that the harm to biodiversity and green infrastructure outweighed the economic benefits of the proposal. At no point in his decision letter, does the inspector mention there being a "gap" between Newbury and Thatcham, or that existing policy to protect the rural area is in any way sub-standard. Consequently, there is no need to add a further layer of constraint. Existing countryside policies will ensure that unduly harmful development will not be permitted.

My clients land is in Parcel 4, identified in the report as: a relatively small parcel located between Newbury and Thatcham to the north of the railway line but to the south of the A4. It contains a number of lakes and a large part of the parcel is within flood zone 3.

<for map and table see attachment>

The assessment of the proposed gap fails to mention that unsuitable development on the area would be prohibited by existing policies, such as LV1 and CS19. In addition, existing green / blue infrastructure and rights of way would be protected by policies CS17 and CS18. In this context, there is no need for a further designation of "local gap" and another, unnecessary layer of constraint.

The report concludes with regard to parcel 4, as follows:

Parcel 4 (whole) – this parcel provides an essential gap between Thatcham and Newbury where development would significantly visually or physically reduce the perceived or actual distance between them. Part of this parcel was subject of an appeal (Hambridge Lake, Hambridge Road) which is discussed in Chapter 5. The inspector concluded that although the role that the appeal site plays in maintaining separation between the settlements may be limited in its physical extent, it is nonetheless an important role. This separation role remains particularly important along the southern side of the London Road given the near coalescence of Newbury and Thatcham to the north.

The authors of the report appear to have placed a great deal of emphasis on the fact that an appeal was dismissed in respect of my clients land at Hambridge Lake and this justifies the designation of the whole parcel as green gap. In fact, the opposite is the case, because the inspector found that the proposed development was not acceptable in the context of existing policies, none of which mention the gap or any need for a gap. The appeal decision made it clear that existing policies protected land outside of settlements from unacceptable development. The inspector made no mention of a gap or the need for a policy to protect the gap. Therefore, there is no need for a further layer of constraint.

9.10 Gaps are a long established planning tool used to prevent the coalescence of settlements in order to maintain their separate identity. A clear gap between distinct settlements helps maintain a sense of place for residents of, and visitors to, the settlements on either side of the gap. They prevent development in areas where there is the greatest risk of coalescence and so ensure that by retaining a sense of openness, local distinctiveness is maintained.

West Berkshire Council has managed perfectly well for many years without a specific local plan policy seeking to protect gaps between settlements. A recent appeal decision at Hambridge Lake has demonstrated that existing policies are perfectly adequate when it comes to protecting rural areas and green infrastructure from development that is considered to be harmful. Just because other council's have adopted policies to protect gaps, it doesn't necessarily follow on that West Berkshire Council has to do the same. There is no justification for this policy. It is not needed and it is just another unnecessary layer of constraint.

9.11 The identified gaps set out in the policy have not been specifically defined to protect the landscape character of the countryside around Newbury and Thatcham, the Council's approach to which is set out in Policy SP8. It is important to recognise that the gaps are not a local landscape designation. Landscape character assessment can be used however to inform and understand how the settlement pattern has developed, the nature of the individual character and setting of each distinct settlement, the pattern of the separation between them and how the landscape functions to maintain that separation.

This paragraph contradicts itself. It is clear that the gaps between Newbury and Thatcham are proposed for designation in order to prevent the two settlements from merging into each other. The quality of the landscape is not relevant. The proposed gaps are not landscape designations and the quality of the landscape in the gaps is not a determinative factor. However, the paragraph then goes on to say that "landscape character assessment can be used however to inform and understand how the settlement pattern has developed, the nature of the individual character and setting of each distinct settlement, the pattern of the separation between them and how the landscape functions to maintain that separation." This is a direct contradiction of the first part of the paragraph, which says that the designation of gaps is not intended to protect the landscape character of the area concerned. Gaps are like green belts in that they have a planning function, but the quality of the landscape and other environmental factors are not a consideration. This paragraph further shows that the gap policy is flawed and not fit for purpose.

	<p>9.12 The land included within each identified gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence. In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements has been included.</p> <p>It is not agreed that that “no more land than necessary” has been proposed for designation as gap. On the contrary, a very large area indeed has been proposed as gap. With regard to the area of gap to the south of the A4, where my clients land is location, most of the proposed gap is former gravel workings, which now consist of lakes and wet woodland. The area is protected by environmental designation, such as SSSIs and Nature Reserves. There is no need for a further layer of constraint and there is certainly no need for such a large area to be designated.</p> <p>9.13 Currently, the parcel of land between Thatcham and Upper Bucklebury does not meet the criteria for designation as an essential gap. However, the Council acknowledges that this situation may change depending on how the North East Thatcham strategic site is delivered. The relationship between the proposed development and the country park to the north of the site will be critical in this regard. In accordance with the recommendations made in the Appropriate Countryside Designation Study (2022), further assessment as to an appropriate essential gap in this area will need to be carried out when the extent of the built development on the site has been established.</p> <p>This matter is not relevant to my client's land. Therefore, we have no comment.</p> <p>In summary, we consider that policy DM2 Separation of Settlements around Newbury and Thatcham is unnecessary and flawed. The policy should be deleted from the draft local plan. The policy just adds a further layer of constraint, which is not necessary or reasonable. Once policy DM2 is deleted, the supporting text in paragraphs 9.8 to 9.13 should also be removed from the local plan.</p> <p>It is hoped that these representations, submitted on behalf of Mr Steve Hamilton, will be given due consideration by the council in the evolution of the emerging West Berkshire Local Plan. (Attachment - Jim Bailey (Steve Hamilton) REDACTED))</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Saunderson, Paula
<p>Consultee Full Name</p>	Paula Saunderson
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS890
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf PS890 Paula Saunderson - Countryside Designation Study Map.pdf PS890 Paula Saunderson - AONB Map
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<i>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</i>

DM2 – SEPARATION OF SETTLEMENTS AROUND NEWBURY & THATCHAM

[See attachment PS890 Paula Saunderson – Countryside Designation Study Map]

https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West_Berkshire_Appropriate_Countryside_Designation_for_web.pdf?m=638103394389630000

Policy DM2 relates to this Evidence Document and includes these Gaps:

- 1 Land between Newbury and Donnington
- 2 Land between Newbury and Enborne Row/Wash Water
- 3 Land between Newbury and Thatcham
- 4 Land between Thatcham and Cold Ash
- 5 Land between Thatcham and Ashmore Green

It does not include a Gap between Newbury & Ashmore Green which would run along Stoney Lane and East to Long Lane. And it does not include a Gap between Newbury & Cold Ash - between B4009 & Stoney Lane.

By not having these Gap it will be possible for Developers to build out from Newbury North right up to the AONB, and if that is the intention of this Plan then that should be stated clearly in the Spatial Strategy.

[See attachment PS890 Paula Saunderson – AONB Map]

The Conclusion that the Lands between Newbury North & Ashmore Green & Shaw- cum- Donnington – all part of Parcel 9 - does not provide an essential gap between settlements therefore a Green Gap/Wedge Designation is not recommended is incorrect. And it is obvious that the considerations of Green Gaps put into the North of Thatcham have not been consistently applied to North of Newbury. The North Newbury Urban sprawl will stretch for miles without designated Green Gaps, and the preservation of currently productive Agricultural & Food Producing lands has not been considered in the Assessment.

https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West_Berkshire_Appropriate_Countryside_Designation_for_web.pdf?m=638103394389630000

Document titled APPROPRIATE COUNTRYSIDE DESIGNATION STUDY has not been advised to Newbury Town Council and not come before NTC Planning Committee. None of our Elected Representatives have had the opportunity to comment on or give input into this Document before being published as part of the LPR Section 19 Submission. For this reason this Policy is **Not Sound**.

DM2 - I have concerns around this Appropriate Countryside Designations Study which I am not sure any of my elected representatives will have seen?

https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West_Berkshire_Appropriate_Countryside_Designation_for_web.pdf?m=638103394389630000

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wallis Trustees (Represented by Carter Jonas)
Consultee Full Name	Frank Wallis Estate Trustees
Consultee Organisation	Wallis Trustees
Agent Full Name	Steven Sensecall
Agent Organisation	Carter Jonas
Comment ID	PS1384
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 15:10:00
Attached Files	Wallis Trustees Proposed Vision.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	Local Plan Review complies with Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes
* Yes	

<p>* No</p> <p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>[See attached Proposed Vision document]</p> <p>The proposed submission plan refers on many occasions to the constrained nature of West Berkshire, with 74% of the district designated AONB, 90% rural in character, parts of the district subjected to flooding, the registered battlefield to the west of Newbury, nutrient neutrality zone around the River Lambourn catchment and development restrictions imposed by the Atomic Weapons Establishments at Aldermaston and Burghfield. West Berkshire Council considers that only approximately 15% of the district can be considered available through the local plan process for potential development.</p> <p>It is therefore surprising that, in light of the hugely constrained nature of the district, the Council is now seeking to further prevent the possibility for sustainable development around the most sustainable settlements through the introduction of green wedges in the proposed submission Regulation 19 plan. This is considered contrary to NPPF paragraph 60 as the policy does not support the objective of significantly boosting the supply of homes and instead will strangle the future supply of housing. This is a restrictive policy and, as recognised by the Sustainability Appraisal, is incompatible with the Sustainability Appraisal's objective "to enable provision of housing to meet identified need in sustainable locations."</p> <p>It is considered that this new policy is unnecessary as the existing policies in the Local Plan seek to avoid development outside settlement boundaries in the open countryside. Indeed, it is acknowledged at Paragraph 5.44 in the draft Local Plan Review that;</p> <p><i>"Much of the pressure for development is around the edges of settlements, which can physically lead to coalescence or introduce an increase in activity which has an urbanising effect. Despite this, a key feature of even the larger settlements is the way in which few have coalesced in recent times and so the blurring of the physical distinction between places has largely been avoided."</i></p> <p>Additionally, it is noted that the draft Local Plan Review proposes to continue the allocation of residential development in the North Wessex Downs AONB and is proposing that a further 5 site allocations for a total of 104 dwellings be added to the carried forward allocations totalling 289 dwellings across the 5 sites. The justification for the further major development allocations in the North Wessex Downs AONB are the perceived constraints around the Newbury and Thatcham spatial area.</p> <p>Policy DM2, as currently worded, is a wholly negative and unnecessary policy which imposes further constraint on an already heavily constrained authority. Other planning authorities elsewhere have incorporated green wedge policy into their local plans which contribute to the setting of towns, protecting and enhancing green infrastructure assets as well as supporting development in green wedges subject to a number of criteria.</p> <p>Further development in the AONB could be avoided by the deletion of draft Policy DM2 and a thorough consideration of edge of settlement sites at Newbury and Thatcham should be undertaken. This would facilitate the additional allocation of sustainable edge of settlement locations, out with the AONB, such as on land to the east of Waller Drive, Newbury where up to circa 350 dwellings could be sustainably and sensitively accommodated.</p> <p>The Arup report "Appropriate Countryside Designation Study" (21st November 2022), which aims to justify this policy, applied a blanket approach to the consideration of the green wedge designation and did not consider the potential for nuanced, landscape sympathetic development on sustainably located land parcels adjoining the settlement boundaries, such as on land east of Waller Drive, Newbury. A finer grain assessment needs to be undertaken to consider the landscape where the openness has already been compromised through existing physical structures therefore contradicting the Green Wedge designation.</p> <p>Whilst the proposed development will clearly involve built development, as demonstrated in the accompanying Vision document, it can be designed having regard to the sensitive nature of the site to ensure that substantial green corridors are provided along the site's boundaries and within it to try and maintain the site's open character, in consideration of the character of this part of the proposed green wedge designation. The proposed layout of the development is spacious in character, being of fairly low density at 35 dwellings per hectare and works with the existing landscape to minimise any losses or impact on the landscape value and by retaining landscape features that will act as visual breaks and screens from the wider area. It is considered that the development proposals east of Waller Drive, and</p>

its design / layout, has had regard to the openness and characteristics of this part of the landscape to avoid any potential for coalescence with Thatcham in addition to creating a strong eastern boundary which reinforces the separation of the settlements.

West Berkshire's "Landscape Sensitivity Approach to Settlement Expansion within West Berkshire" summary report for Newbury (Kirkham Landscape Planning Ltd May 2009) concludes that the Lower Henwick Dipslopes, Parcel 2E, which covers a larger land parcel containing the land east of Waller Drive, Newbury, have an overall landscape sensitivity of Medium to Low. It is recognised that draft Policy **DM2** is not a local landscape designation and seeks to safeguard the unique characters and separate identities of Newbury and Thatcham. As confirmed by the appeal decisions cited in Arup's report, the adopted policies in the Core Strategy have been generally strong enough to protect the landscape character of the area, demonstrating that this additional policy restraint is totally unnecessary.

It is also considered that the Sustainability Appraisal (SA) is flawed in relation to Policy **DM2** as Appendix 6 justifies SA Objective 1 "to enable provision of housing to meet identified need in sustainable locations" as having an unknown impact on the provision of affordable housing only and does not consider market housing and the economic benefits of additional housing supply to the economy. The SA Sub Objective is "To enable provision of housing to meet all sectors of the community, including those with specialist requirements". It may be that some specialist requirements are only provided by the private sector and delivered through a market housing mechanism.

Furthermore, the SA considers that there will be a neutral impact on health, safety and wellbeing in that the draft policy is likely to impact on healthy active lifestyles. It is argued that by locating development on the edge of sustainable settlements at the top of the settlement hierarchy encourages active lifestyles through the variety of facilities and services that are on offer at Newbury and Thatcham. The policy similarly conflicts with SA Objective 3, improving accessibility to community infrastructure, and SA Objective 4 in that it does not maximise or promote opportunities for sustainable travel. By restricting development in these sustainable locations will have an overall negative impact and is therefore incompatible with the SA.

It is noted that the Arup report considers that the strength of the existing policy protecting the coalescence of Newbury and Thatcham has been assessed in the context of West Berkshire demonstrating a five year housing land supply and raises caution in the event that the housing supply falls below five years. However, in a 'sub-5 year world' the presumption in favour of sustainable development would apply with or without the green gap policy. There is agreement with the report's conclusion that the current policy approach preventing coalescence is justified and effective however, Carter Jonas consider that a further policy restriction on sustainable development is totally unnecessary and the policy should be worded more positively.

Whilst there is some sympathy with the conceived essential gap between Newbury and Thatcham preventing coalescence, sustainable development east of Waller Drive enables the creation of a permanent green gap in the form of a country park, which would be retained, with certainty, in perpetuity. This approach reinforces Arup's consideration in relation to a potential Local Green Space designation on the existing driving range.

Policy **DM2** is unsound as it is a negative policy, limiting sustainable development and pushing development into less sustainable sites in the AONB in order to meet identified housing need. Consequently, the plan cannot be considered to be sound as it is not positively prepared. Whilst it is considered that the policy should be deleted, the below positive policy amendment which enables sustainable development is provided to assist the Council in planning positively.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
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Please give reasons for your answer

<p>4. Proposed Changes</p>	<p>Policy DM2 Separation of Settlements around Newbury and Thatcham Suggested Modification:</p> <p>In order to prevent the coalescence of Newbury and Thatcham and to maintain the separate identity of the distinct settlements around both towns, the following gaps between settlements have been identified and are outlined on the Policies Map:</p> <ol style="list-style-type: none"> Land between Newbury and Donnington Land between Newbury and Enborne Row / Wash Water Land between Newbury and Thatcham Land between Thatcham and Cold Ash Land between Thatcham and Ashmore Green <p>Development which would detract from the open the open or rural character of these gaps will not be permitted. In these areas development will only be permitted where it:</p> <ol style="list-style-type: none"> Would not diminish the clear physical and visual separation between distinct settlements; and Would not compromise the integrity of the gap either individually or cumulatively with other existing or proposed development. <p>Include additional text "Supporting development in Green Wedges that:</p> <ul style="list-style-type: none"> Retains the open and undeveloped character of the Green Wedge; Retains and creates green networks between the countryside and open spaces within the urban areas; and Retains and enhances public access to the Green Wedge, especially for recreation.
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5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Attendance is required at the examination to enable explanation of stance, participation in the discussions and to answer questions posed by the Inspector.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1444
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	No

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The policy should require gaps between other settlements, such as:</p> <ul style="list-style-type: none"> • Between Theale and Calcot/ Tilehurst • Between Pangbourne and Purley-on-Thames
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The policy should be re-titled as "Separation of Settlements" and the list of settlements should be expanded to include:</p> <ul style="list-style-type: none"> • Theale and Calcot/Tilehurst • Pangbourne and Purley-on-Thames
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	To explain why gaps between settlements are required
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1344
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	S Pike Attachment 5 - Appropriate Countryside designation - Specification.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	Yes

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Separation of settlements around Newbury and Thatcham</p> <p>[See attached document Attachment 5]</p> <p>I welcome and support Policy DM2 Separation of Settlements around Newbury and Thatcham, and believe that it is generally sound. In particular, it supports the inclusion of the following separations between settlements in the Policy:</p> <p>c. Land between Newbury and Thatcham</p> <p>d. Land between Thatcham and Cold Ash</p> <p>e. Land between Thatcham and Ashmore Green</p> <p><i>(I do not express a view on items a. and b. which relate to Newbury)</i></p> <p>However, the omission of 'land between Thatcham and Bucklebury' from this Policy is inconsistent with the evidence. This specific aspect of the Policy is not based on proportionate evidence, and is therefore unsound.</p> <p>The gaps that are defined in Policy DM2 are based on the Appropriate Countryside Designation Study (Arup, 21 November 2022), and particularly on the analysis in Appendix C – Parcel Proformas, which is summarised in Section 7 of the report.</p> <p>In this analysis, the 'Land between Thatcham and Bucklebury' (parcel 6 in the study) 'Land between Thatcham and Cold Ash' (parcel 7 in the study) are given identical scores in the Green Belt Assessment. However the assessment summaries for the two sites are diametrically opposed:</p> <p>For 'Land between Thatcham and Cold Ash' and 'Land between Thatcham and Ashmore Green': "The land between Thatcham and Cold Ash and Thatcham and Ashmore Green (as shown on the map below) are essential gaps and on this basis are recommended for potential Green Gap designation."</p> <p>For 'Land between Thatcham and Bucklebury': "As existing, this parcel provides a 'wider gap' between Thatcham and Upper Bucklebury where there may be scope for development but where the overall openness and the scale of the gap is important to restricting merging.</p> <p>The proposed North East Thatcham strategic allocation is, however, included in this parcel. As noted in Chapter 4 the issue of the allocations proposed in the Emerging LPR is assumed to be potentially open. Given that a masterplan has yet to be produced for the North East Thatcham site which would identify which areas of it would be proposed as green infrastructure/green space, it is not possible to provide a further assessment of the gap at this time."</p> <p>The specification for the Appropriate Countryside Designation Study (which forms part of the tender documentation for this project) included the following considerations:</p> <ul style="list-style-type: none"> - The successful candidate will be expected to propose strategic designations and policy suggestions that ... anticipate changing circumstances over a long term period. - The work should support other relevant policies contained in the LPR. - High level masterplanning work for the North East Thatcham site (the Thatcham Strategic Growth Study) has already been produced and this can contribute to this work. <p>Therefore, the results of the study for 'Land between Thatcham and Bucklebury' were pre-determined by the 'considerations' for the study. The conclusions of the Appropriate Countryside Designation Study that led to the omission of the gap between Thatcham and Bucklebury from Policy DM2 are not based on proportionate evidence in the study. The description of the exclusion of this gap from Policy DM2 that is described in paragraph 9.13 is therefore unsound.</p> <p><i>These considerations can be found in Section 4 of the specification, which is provided as Attachment 5 to these representations (obtained under Freedom of Information).</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>The following text should be added to policy DM2: "f. Land between Thatcham and Bucklebury"</p> <p>The resulting consequential changes then need to be made to Policy SP17.</p>

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1693
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	Yes

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p> <p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Thatcham Town Council welcomes and supports Policy DM2 Separation of Settlements around Newbury and Thatcham, and believes that it is generally sound. In particular, it supports the inclusion of the following separations between settlements in the Policy:</p> <p>c. Land between Newbury and Thatcham</p> <p>d. Land between Thatcham and Cold Ash</p> <p>e. Land between Thatcham and Ashmore Green</p> <p><i>(Thatcham Town Council does not have a view on items a. and b. which relate to Newbury)</i></p> <p>However, the Town Council believes that the omission of 'land between Thatcham and Bucklebury' from this Policy is inconsistent with the evidence. This specific aspect of the Policy is not based on proportionate evidence, and is therefore unsound.</p> <p>The gaps that are defined in Policy DM2 are based on the Appropriate Countryside Designation Study (Arup, 21 November 2022), and particularly on the analysis in Appendix C – Parcel Proformas, which is summarised in Section 7 of the report.</p> <p>In this analysis , the 'Land between Thatcham and Bucklebury' (parcel 6 in the study) 'Land between Thatcham and Cold Ash' (parcel 7 in the study) are given identical scores in the Green Belt Assessment. However the assessment summaries for the two sites are diametrically opposed:</p> <p>For 'Land between Thatcham and Cold Ash' and 'Land between Thatcham and Ashmore Green':</p> <p>"The land between Thatcham and Cold Ash and Thatcham and Ashmore Green (as shown on the map below) are essential gaps and on this basis are recommended for potential Green Gap designation."</p> <p>For 'Land between Thatcham and Bucklebury':</p> <p>"As existing, this parcel provides a 'wider gap' between Thatcham and Upper Bucklebury where there may be scope for development but where the overall openness and the scale of the gap is important to restricting merging.</p> <p>The proposed North East Thatcham strategic allocation is, however, included in this parcel. As noted in Chapter 4 the issue of the allocations proposed in the Emerging LPR is assumed to be potentially open. Given that a masterplan has yet to be produced for the North East Thatcham site which would identify which areas of it would be proposed as green infrastructure/green space, it is not possible to provide a further assessment of the gap at this time."</p> <p>The specification for the Appropriate Countryside Designation Study (which forms part of the tender documentation for this project) included the following considerations (these are copied in full below):</p> <ul style="list-style-type: none"> • The successful candidate will be expected to propose strategic designations and policy suggestions that ... anticipate changing circumstances over a long term period. • The work should support other relevant policies contained in the LPR. • High level masterplanning work for the North East Thatcham site (the Thatcham Strategic Growth Study) has already been produced and this can contribute to this work.

	<p>Therefore, the results of the study for 'Land between Thatcham and Bucklebury' were pre-determined by the 'considerations' for the study. The conclusions of the Appropriate Countryside Designation Study that led to the omission of the gap between Thatcham and Bucklebury from Policy DM2 are not based on proportionate evidence in the study. The description of the exclusion of this gap from Policy DM2 that is described in paragraph 9.13 is therefore unsound.</p> <p>West Berkshire Green Wedge, Gap or Belt Study between Newbury and Thatcham</p> <p>Considerations</p> <p>4.1 The successful candidate will be expected to propose strategic designations and policy suggestions that are strong and defensible at appeal while also being effective in their use and implementation and should anticipate changing circumstances over a long term period. The work should support other relevant policies contained in the LPR.</p> <p>4.2 High level masterplanning work for the North East Thatcham site (the Thatcham Strategic Growth Study) has already been produced and this can contribute to this work. In addition a Landscape Sensitivity and Capacity Assessment has been undertaken for this site. This has not been published online, but can be made available to the successful tender.</p> <p>4.3 There is also vision for Thatcham which will build on this work and will set out the strategic direction of development in the town over the next 30 years versus the more local vision for the town, although it is not complete yet.</p> <p>4.4 While town centre visioning work has been done for Newbury and can be taken into account, equivalent work to the Thatcham Strategic Growth Study does not exist. The visioning work (being undertaken by Icen) for Newbury will again set out the strategic direction of development over the next 30 years versus the more local vision for the town, but is not complete yet.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>The following text should be added to policy DM2: "f. Land between Thatcham and Bucklebury." The resulting consequential changes then need to be made to Policy SP17.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thatcham Town Council is the principal representative body of the community of Thatcham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thatcham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thatcham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1523
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf Croudace Homes Combined Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>[For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>Separation of Settlements around Newbury and Thatcham (Draft Policy DM2)</p> <p>Draft Policy DM2 aims to prevent the coalescence of Newbury and Thatcham to maintain the separate identity of the district settlements around both towns, and was informed by the preparation of the 'Appropriate Countryside Designation Study' (2022). To achieve this goal, the draft policy proposes to designate five gaps, shown on the draft as Policies Map effectively as proposed 'green gaps'.</p> <p>Croudace notes that there are two proposed 'green gaps' to the north of Thatcham, closest to Henwick Park – one between Thatcham and Cold Ash (to the north east), and another between Thatcham and Ashmore Green (to the north west). This is illustrated by the excerpt in Figure 6.</p> <p>Naturally, Croudace supports the exclusion of Henwick Park from both proposed green gaps. Its omission demonstrates that, in line with the policy wording itself, the site's development would not diminish the clear physical and visual separation between the settlements and would not compromise the integrity of the gap, either individually or cumulatively with other proposed development.</p> <p>That being said, some of the proposed green gap between Cold Ash and Thatcham does overlap slightly with some of the area proposed for extensive POS (i.e. a country park) at Henwick Park. However, it is Croudace's firm view that this would not conflict with the policy, as any physical built development would fall outside of the gap, whilst the presence of the Country Park to be proposed by Croudace would provide additional preservation to the gap between Thatcham and both Cold Ash and Ashmore Green.</p> <p>Evidence Base</p> <p>West Berkshire Appropriate Countryside Designation Study (November 2022)</p> <p>The West Berkshire Appropriate Countryside Designation Study was prepared to determine whether specific designations for countryside areas around Newbury and Thatcham would be an appropriate inclusion in the LPR. It assesses the suitability of several parcels of land to be subject to Green Belt, Green Gap/Wedge or Local Green Space designations.</p> <p>Henwick Park forms part of Parcel 7, located to the north/north-west of Thatcham up the boundary of Cold Ash and includes the settlement of Ashmore Green (Figure 12).</p> <p>In summary, the Study found that there would be some benefits to be derived from designating Green Gaps on two specific pieces of land located directly between Ashmore Green and Thatcham and Cold Ash and Thatcham, as the land "provides an essential gap between settlements" and development would be seen to visually or physically reduce the distance between them.</p> <p>However, the Land at Henwick Park lies between these two suggested designations, as illustrated by Figure 12. As such, the site does not play an important role in countryside terms, enough to warrant specific 'Green Gap' protection. This clearly demonstrates the area of Henwick Park is capable of delivering built development free from any designation and well-suited to form a logical extension to Thatcham, between the suggested Green Gaps.</p> <p>The Council can be confident that there are no site-specific reasons why the Land at Henwick Park should not be allocated for residential development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Duty to Cooperate ('DtC') Statement sets out the approach to addressing unmet housing needs from Reading, explaining that the authorities making up the Western Berkshire Housing Market Area have agreed the principle that unmet needs should be met within the housing market area.</p> <p>It acknowledges Reading's current unmet need and confirms that Reading Borough Council must review its Local Plan by 2024. It considers how the unmet need should be dealt with in light of the standard method figure.</p>

	Whilst Croudace commends the authorities for taking the DtC this far, it considers that the LPR should seek to address the unmet needs of Reading now, rather than loosely committing to do so at a later date, as we set out subsequently in these representations.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1429
Chapter / Policy / Appendix Number	Policy DM 2
Chapter / Policy / Appendix Title	
Order	150
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>We support the requirement to provide separation of settlements. Based on the LCA, previously mentioned in our comment on SP8, we strongly believe that the area west of the A34 in Speen Parish should also be included in this Policy. Failure to do so risks development on a 'rural and wooded approach and gateway into Newbury' and, more importantly, the annexation of Stockcross into semi urban Newbury along with the potential loss of leisure facilities that promote health and wellbeing.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The</p>	Yes

<p>publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Policy DM 3

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hoddinott, Keith
Consultee Full Name	Keith Hoddinott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS484
Chapter / Policy / Appendix Number	Policy DM 3
Chapter / Policy / Appendix Title	
Order	152
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Undoubtably, there will be financial strains on public expenditure, & it is, therefore, very important that sport & exercise should be prominent & not sidelined in schools.</p> <p>Over many decades successive governments & authorities have reduced time for sport & disposed of playing fields. If the government is serious about reversing the unhealthy trend, then the time has come to make "Sport & Nutrition" a significant & important part of school life & education.</p> <p>As chair of Newbury Junior Netball, I ask members, parents & teachers to keep their "eyes & ears" awake to any changes to sports facilities at schools to ensure that sports facilities are enhanced & not diminished, particularly in respect of Park House & the planned Sandford development.</p> <p>There are, today, so many professional opportunities in sport, not only Netball but in the increasing high profile womens' football, rugby & cricket sports, whether it be, as a player, coach, umpire, administrator, or media commentator. Many of the skills coached in one sport are often transferrable to other team ball games.</p> <p>Sport teaches us discipline, respect for rules etc, team spirit, how to react to disappointment. It sets us up for life to partake in sport & so keep healthy.</p> <p>As new developments come forward, demands will be made for land for schools.</p> <p>Developers may contrive to reduce the area required, at the expense of sports facilities.</p> <p>Facilities for amateur sport to hire from schools is already limited, & the dispute over the LRIE football provision has not improved the situation.</p> <p>Has WBC instigated an appraisal (researching past contract specification documents) of whether any school (& other public buildings) are likely to be affected by the recent event of a school collapsing due to defective reinforced concrete.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Theale Parish Council</p>

Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS624
Chapter / Policy / Appendix Number	Policy DM 3
Chapter / Policy / Appendix Title	
Order	152
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039:</p> <p>37. DM3 states "Development that would have an unacceptable impact on the health or wellbeing of existing or new communities will not be permitted" yet all the development proposed would have an unacceptable impact, particularly air and noise pollution, increased traffic and congestion, further strain on medical facilities, loss of open green space, loss of biodiversity etc.</p> <p>38. 10 Development Management Policies. 10.2. It states leisure facilities are very good yet Theale has none, or any direct public transport links to any. This needs to be stated in the Plan. Theale already has very little open green space and it is extremely important that these are protected.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Purley on Thames Parish Council
<p>Consultee Full Name</p>	Christopher Thompson
<p>Consultee Organisation</p>	Purley on Thames Parish Council
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS512
<p>Chapter / Policy / Appendix Number</p>	Policy DM 3
<p>Chapter / Policy / Appendix Title</p>	
<p>Order</p>	152
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p>	E-Mail

* SMS * Web * Unknown	
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	After a revised period, consultation was advised
4. Proposed Changes	None - we would ask the planning authority to take into account the attached observations
5. Independent Examination - If your representation is seeking a change, do you consider it	No

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Bell Cornwell LLP))
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Brigid Taylor
Agent Organisation	Bell Cornwell LLP
Comment ID	PS1248
Chapter / Policy / Appendix Number	Policy DM 3
Chapter / Policy / Appendix Title	
Order	152
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	DM3 (Health and Wellbeing) is supported. We would also suggest including express reference to the health and wellbeing benefits of residents of rural villages being able to stay within their local community as their needs change. Children should be able to buy a home near where they grew up, should they wish, to continue to provide support to their parents as they age. Older residents who are downsizing should have the option of staying in the community where they have social support and connections. Those with particular health/ accessibility needs should be able to commission/ self build a home to suit their needs. Residents should be able to find suitable housing to accommodate their needs without needing to relocate further away from their support network. Development which delivers small scale housing to meet local needs should be supported.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Amend policy to express support for development which supports rural villages, in allowing them to grow and thrive, and which provides for social limb of sustainability, in terms of residents being able to continue to live in communities where they can provide and receive support to others.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1445
Chapter / Policy / Appendix Number	Policy DM 3
Chapter / Policy / Appendix Title	
Order	152
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	Yes

cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	NHS Resolution
Consultee Full Name	NHS Property Services
Consultee Organisation	NHS Property Services
Agent Full Name	
Agent Organisation	
Comment ID	PS1583
Chapter / Policy / Appendix Number	Policy DM 3
Chapter / Policy / Appendix Title	
Order	152
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	08/03/2023 17:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>*Late Response*</p> <p>NHSPS supports the principles identified in Policies DM3 and DM40</p> <p>There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure, enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.</p> <p>The NPPF is clear in stating that "Planning policies and decisions should aim to achieve healthy, inclusive and safe places" (Paragraph 92).</p> <p>Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we support the principle of policies which require an active consideration of health matters.</p>

	<p>Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. In those cases, and where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services in that particular location, a more flexible approach for public service providers should be applied when considering a change of use to non-community uses.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Policy DM 4 Building Sustainable Homes and Businesses

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hayes-Newington, Mark
Consultee Full Name	Mark Hayes-Newington
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS21
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:08:32
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The Policy DM4 1B The policy would almost certainly be impossible to achieve commensurate with Listed Building Law and regulations. These properties should be carved out otherwise the plan effectively blocks development or refurbishment of this class of premises. Equally the use of local micro generation is permitted but no context for alterations to listed buildings on the buildings themselves or in the curtilage has been provided for point 4 directly contradicts the supporting text which states that carbon offsetting can be used not just cash facilities. Nor has consideration been given to the potential for carbon offsetting facilities in the district to be in short supply of exhausted at which point the restriction on use of facilities within the district acts as a complete block on development that needs to rely on offsetting.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	

<p>cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	I dont beleieve there has been any discussion with Histroic England or unofficial experts like the Listed Proprty Owners Club
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Ridgepoint Homes Ltd
<p>Consultee Full Name</p>	Miss Emma Runesson
<p>Consultee Organisation</p>	Ridgepoint Homes Ltd
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS197
<p>Chapter / Policy / Appendix Number</p>	Policy DM 4
<p>Chapter / Policy / Appendix Title</p>	Building Sustainable Homes and Businesses

Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	In regard to the minimum standards of construction for new development of one or more new dwellings set out under point A in part 1 of the draft policy, the first requirement notes that the Future Homes Standard has not yet been confirmed by central government and we understand it is currently envisaged that this will not be implemented until 2025. In the interim, the proposed requirement to achieve a 63% reduction in carbon emissions compared to the baseline emission set by Building Regulations Part L 2021 is considered extremely onerous compared with the current Building Regulations which utilise 2013 as the baseline. This would result in developments having to reach very close to net zero carbon which is not a government target until 2050, beyond the new Plan period. In light of this, we do not consider it is appropriate to introduce new or enhanced requirements beyond Building Regulations at the time and achieving this would likely result in additional costs for developments.

	<p>We therefore suggest that the first requirement under point A in part 1 of the draft policy is amended as follows to reflect current Building Regulation requirements: “achieve the carbon Target Emission Rate set by the Future Homes Standard once this is confirmed and implemented by central government; in the meantime, achieve a reduction in carbon emissions in line with current Building Regulations requirements at the time”.</p> <p>In regard to the second requirement under point A in part 1, the equal to or less than 15 kWh/m2/ year space heat demand target is unachievable. This would likely require different methods of construction to achieve this target which would ultimately result in additional costs that could impact development viability. We therefore suggest that this second point is deleted.</p> <p>In respect of part 4 in relation to carbon offsetting, we suggest that the value per kg of Co2 is established within the draft policy or supporting SPD's to provide certainty for developers in the costs of developments.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We therefore suggest that the first requirement under point A in part 1 of the draft policy is amended as follows to reflect current Building Regulation requirements: “achieve the carbon Target Emission Rate set by the Future Homes Standard once this is confirmed and implemented by central government; in the meantime, achieve a reduction in carbon emissions in line with current Building Regulations requirements at the time”.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS635
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 39. S10. The Plan needs to state how omissions will be reduced. Omissions are already high with the M4 and the A34 cutting across most of the district. More development will dramatically increase these problems. 40. S10. The Plan states that you will meet national targets. The Plan needs to state how you will do this. With more development the Plan needs to state clearly how electricity and gas usage will be cut and how fuel poverty will be addressed. 41. 10.34. You need to explore the current Local Plan and address the issues in 10.15

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Molloy, Stephanie
Consultee Full Name	Stephanie Molloy
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS459
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 17:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	Why is West Berkshire Council not insisting on all the new properties being built with solar and wind power as from now, as well as any other long term eco building practices. You do not need to wait for the Government's target date before taking action.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS712
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Sandleford Park West (SPW)</p> <p>Policy DM4 (Building Sustainable Homes and Businesses) requires that, ahead of formal adoption of Future Homes Standard, development achieves a 63% reduction in carbon emissions by on-site measures, as compared to Part L Building Regulations. It goes on to require targets for space heat demand targets. The proposed levels expected by this policy are completely excessively and overly onerous. In terms of evidence for this, the Council's own evidence base for this policy (WBC Evidence Report – Local Plan Review (LPR) – Policies SP5 and DM4 (Evidence Base) confirms that the Climate Change Act sets standards that require 15-20kWh/m2/year space heat demand, by 2025. As drafted, and at the time of drafting, the Council's proposed policy requires a lower threshold at an earlier point targeted by the Climate Change Act. The explanation as to why a lower threshold (15kWh/m2/year space heat demand as opposed to a range of 15-20) has been included in the Policy is that the '<i>.....target was revised to less than 15kWh after further consideration at the officers' workshop.....</i>'. The technical evidence discussed during that workshop is unclear along with whether any relevant, industry experts attended/informed the conclusions drawn.</p> <p>On a similar theme, para 9.5 of the Council's evidence paper outlines the proposed approach in relation to carbon Target Emission Rates. The paragraph sets out assumptions for % reductions in carbon emissions based on 63% being '<i>approximately equivalent to 75% on the Part L 2013 Building Regulations</i>'. It is unclear how this 'assumption' has been made, whether the result of the assumption has been tested from an implementation and viability perspective, and whether sound technical advice has been sought in relation to the assumption.</p> <p>The above are two examples whereby the Council's evidence for the onerous targets set by policy DM4 appears to be questionable, which gives rise to a question mark over the reliability of the policy as a whole. Furthermore, it is unclear whether the policy has been 'tested' in terms of how viable, or not, the requirements are for implementation.</p> <p>There are other examples within the Evidence Base paper where similar 'assumptions' appear to have been made, and there is a lack of clarity on why the Council has drawn the conclusions it has. Given the technical topic area, before, potentially unsound, evidence is used to inform a policy that could place requirements on the development industry that could compromise future viability, it needs to be rigorously tested by industry experts with the technical expertise to impartially advise on the implications of the various measures/targets proposed.</p> <p>The policy should be re-drafted once these points have been taken into account and properly addressed.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To make the relevant points before the Inspector and provide answers to any queries arising.

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McCarthy and Stone (Represented by The Planning Bureau)
Consultee Full Name	Natasha Styles
Consultee Organisation	The Planning Bureau on behalf of McCarthy Stone
Agent Full Name	Natasha Styles
Agent Organisation	The Planning Bureau on behalf of McCarthy Stone
Comment ID	PS567
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 09:28:43
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Draft Policy DM4, requires all new residential and commercial development to achieve the 'Target Emission Rate' set by the Future homes Standards once it is confirmed, but in the meantime to 'achieve 63% reduction in carbon emissions is achieved by on-site measures as compared to the baseline emissions rate as set by building Regulations Part L 2021 (SAP10.2)'. Although the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2030 is commendable, currently it appears that the Council is going to achieve this through having mandatory standards from adoption of the plan that go beyond government targets until the Future homes Standards come in. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years as the Future homes Standards come into effect. Aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic and more achievable.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • That the policy is stepped in line with emerging government targets and requirements • The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Recommendation:</p> <ul style="list-style-type: none"> • That the policy is stepped in line with emerging government targets and requirements • The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bacon, Ian
Consultee Full Name	Ian Bacon
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS569
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 09:43:41
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	How has the 63% uplift over current Part L standards been arrived at. This is a strange figure and mirrors no other Local Plans that I am aware of.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>As a highly experienced Part L of the Building Regulations (SAP) Assessor of many years standing I fail to understand or agree with the policy under the first bullet point of Section 1 under Policy DM4.</p> <p>The uplift figure of 63% appears to be entirely arbitrary and in my experience will be very difficult and in many cases, impossible to deliver without the addition of renewable electricity generation equipment onto a dwelling.</p> <p>I suspect that this is a move to push all dwellings to install an Air Source Heat Pump (ASHP) for their heating, alongside a tight fabric specification (which is of course correct), however ASHPs are not suitable in all instances, particularly smaller dwellings, where the more logical approach is to minimise heating need through energy efficient fabric, supply heating by direct electric sources and offset with Solar Photovoltaics (PV - renewable electricity generation).</p> <p>It becomes increasingly difficult to design out energy requirements from UK housing and this will seriously affect the financial viability of house building. In my opinion, the UK Government is rightly 'greening' the National Electricity grid and it will be this that picks up the slack once dwellings have gone as far as is reasonably practical.</p> <p>By all means set an uplift figure, but let's have one similar to other LPAs and not one that seriously limits the flexibility of housing to meet the increasingly stringent Building Regulations.</p> <p>The adoption of this policy, which appears ill thought out and to have not taken adequate technical advice, will see even more time wasted for all parties as they too and fro over its inapplicability.</p> <p>Section 2 states a BREEAM requirement. I am also an experienced BREEAM assessor and have undertaken a number of projects in West Berkshire. This is a continuation of the current policy and it is fair to say it hasn't been working, with many projects successfully appealing and downgrading to a Very Good requirement.</p> <p>Again, this is a waste of the planning department and developers' time and whilst all schemes are different, BREEAM has to be applied in a sensible manner and not as a blanket requirement.</p> <p>Time, effort and resource would be saved if the 100m/sq limit (just for the BREEAM requirement) was raised to 1,000m/sq - at this point I would say you would see far less need to downgrade, for despite what is often claimed, real experience shows that larger projects are more suited to higher BREEAM ratings (but again, not always).</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	No

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jardim, Jean-Claude
Consultee Full Name	Jean-Claude Jardim
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS557
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 22:41:34
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>In Section 4. Carbon offsetting. The lack of specificity of the "cash in lieu contribution" is concerning as it could be a potential avenue for misuse. The amount relative should be specified in £/tCO2 and how the council is to use this contribution to offset the Carbon specified.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	Historic England
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	

Comment ID	PS1189
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We suggest further consideration is given to unpacking what is meant by a "suitable" location for renewable energy development. In our opinion, significant detail is not necessarily needed in the Local Plan; but it is likely to help future decision-making if there is greater clarity at this stage on the Council's approach to identifying what "suitable" means, including with reference to the historic environment.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1742
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	5.5 Policy DM4 'Building Sustainable Homes & Businesses' – we support the re-wording of the policy from the Regulation 18 stage to remove the reference to Home Quality Mark standards.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Society
Consultee Full Name	Mr David Peacock
Consultee Organisation	Newbury Society
Agent Full Name	
Agent Organisation	
Comment ID	PS1642
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	Some of the policies in this Local Plan do not appear to be achievable (i.e. effective) without government intervention; for example, some of the carbon-reduction policies. The aim of building carbon-neutral housing (3.1 p. 10) is admirable and should be pursued; but in order for this to be achieved, in practice it would require changes to the (national) building regulations.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Bloor Homes (Represented by White Peak Planning Ltd)
<p>Consultee Full Name</p>	Bloor Homes
<p>Consultee Organisation</p>	Bloor Homes
<p>Agent Full Name</p>	Rob White
<p>Agent Organisation</p>	White Peak Planning Ltd
<p>Comment ID</p>	PS1327

Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	White Peak (Bloor Homes) Annex 1.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Object. The policy as currently worded is not effective. A detailed note setting out Bloor Homes' representations in respect of Policy DM4 is attached to this table as Annexe 1. Policy DM4 Representations. Attachment: annex 1

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Proposed amendments.</p> <p>We would recommend that the text is amended to include:</p> <p>POLICY DM4 Building Sustainable Homes and Businesses</p> <p>New development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should achieve net zero operational carbon emissions (regulated energy only) by implementing the energy hierarchy.</p> <p>Proposals should demonstrate application of the energy hierarchy through submission of an Energy Statement or a detailed energy section within the Sustainability Statement in accordance with Policy SP5 and which identifies how the following minimum standards of construction are achieved to the greatest extent feasible and viable.</p> <p>1. Residential Development - minimum construction standard</p> <p>A. New development of one or more new dwellings (C3 or C4 use class) will meet the following minimum standards of construction:</p> <ul style="list-style-type: none"> • <u>Prior to 2025 homes will meet the requirements of the Interim Future Homes Standard and deliver a 31% carbon reduction above Part L 2013.</u> • <u>From 2025 homes will meet the requirements of the 2025 Future Homes Standard, maximising opportunities to reduce energy demand and carbon emissions through design.</u> • <u>Achieve the carbon Target Emission Rate set by the Future Homes Standard once this is confirmed by central government; in the meantime, achieve 63% reduction in carbon emissions is achieved by on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2). These regulated carbon emission targets are to be achieved before the addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and</u> • <u>Equal to or less than 15kWh/m2/year space heat demand target, evidenced by the Building Regulations Part L SAP Fabric Energy Efficiency metric.</u> <p>B. <u>Where feasible and viable</u>, new residential refurbishment developments of 10+ units will meet BREEAM Domestic Refurbishment Excellent as a minimum.</p> <p>2. New Non-Residential Development, hotels, residential institutions, secure residential institutions - minimum construction standard</p> <p><u>From 2025</u> new development of 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or secure residential institutions (C2A use class) will meet the following minimum standards of construction:</p> <ul style="list-style-type: none"> • <u>Appropriate to the building type, calculate a typical building baseline using a nationally recognised standard and demonstrate a percentage reduction in energy (regulated and unregulated) carbon emissions. These operational carbon emission targets are to be achieved before the addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and</u> • <u>BREEAM Excellent (BREEAM 2018 or future equivalent)</u> <p>3. Renewable Energy</p> <p>A. <u>From 2025</u> Subsequent to the achievement of the minimum construction standards under parts 1 and 2, new development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should include onsite renewable, zero and low carbon energy technologies to achieve net zero carbon operational energy (regulated and unregulated) on site.</p> <p>B. The Council will support proposals for renewable energy provided that the technology is:</p> <ol style="list-style-type: none"> i. Suitable for the location; ii. Not on the most versatile agricultural land (grades 1, 2 and 3a); iii. Is accompanied by a landscape / visual impact assessment; and iv. Would not cause harm to residential amenity by virtue of noise, vibration, overshadowing, flicker or other harmful emissions. <p>4. Carbon Offsetting</p> <p><u>From 2025</u>, where a development proposal of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) and or secure residential institutions (C2A use class) cannot demonstrate that it is net zero carbon in relation operational energy (regulated and unregulated), it will be required to address any residual carbon emissions for a period of 30 years through a cash in lieu contribution using a carbon offset cost of <u>£xxx</u> per tonne. Grid decarbonisation can be considered when calculating the offset cost.</p> <p><i>Supporting Text</i></p> <p>Renewable energy</p> <p>The use of deficiencies with the national grid as justification for greater renewable energy requirements on development sites is not appropriate and should be removed from the policy and supporting text.</p>

	<p>Furthermore we believe that alternative renewable energy options are prioritised ahead of CHP systems, with the Policy DM4 supporting text updated as shown below:</p> <p>Proposed Amendment 1.</p> <p>Examples of renewable energy technology include:</p> <p>(i) Micro-renewable technology, in particular solar water heating, ground and air source heat pumps, photovoltaic cells and biomass boilers.</p> <p>(ii) Large scale ground mounted solar PV systems; and</p> <p>(iii) Combined heat and power (CHP) with a modest plant being able to serve a large number of dwellings and commercial uses in a small geographical area;</p> <p>Carbon offsetting – The evidence base does not include consideration of the unregulated energy as part of the carbon offsetting cost, it is assumed as a result that no allowance has been included in the viability assessment. Clarity is sought on whether unregulated energy has been properly considered to ensure the soundness of Policy DM4. Draft policy DM4 should also clearly state the carbon offset cost proposed and this should be included in the viability assessment.</p> <p>In addition the Council should clearly set out how the required carbon offset has been achieved, within a reasonable timeframe and suggest paragraph 10.32 is updated as below.</p> <p>'10.32 Funds raised through this policy will be ring-fenced and transparently administered by the Council to deliver a range of projects that achieve measurable carbon savings as locally as possible, at the same average cost per tonne. Funds will be spent within 5 years of collection and returned to the developer. The fund's performance will be reported in the Authority Monitoring report on: amount of funds spent; types of projects funded; amount of CO2 saved.'</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	Yes, to provide the Inspector with further explanation of the need for appropriate policy wording to ensure a deliverable approach towards the delivery of climate change resilient development in West Berkshire and to explain the amendments required to ensure the policy is effective.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1331
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type	E-Mail
* E-Mail	

* Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Whole Plan viability Assessment 2022 Bloor Homes considers there to be a number of potentially significant omissions from the viability assessment that justifies Policy DM4 and, therefore, recommends that the Council reviews the assessment to ensure it is sound and meets the requirements of the NPPF and Planning Practice Guidance (PPG).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Yes, to explain the flaws in the assessment.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Copas Farms (Represented by Barton Willmore)
Consultee Full Name	Copas Farms
Consultee Organisation	Copas Farms
Agent Full Name	Mr Mark Owen
Agent Organisation	Barton Willmore
Comment ID	PS1167
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 16:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	Yes

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Principle of the policy</p> <p>Whilst our client is supportive of the need to reduce greenhouse gas emissions and supports West Berkshire Council for their intention to tackle the climate crisis, our client has soundness concerns regarding the effectiveness and consistency with national policy of the proposed DM4 policy as currently worded.</p> <p><u>Effective:</u> The emerging policy will impact upon viability of development, potentially further impacting the supply of employment land. It is also unclear how the policy will be applied in certain circumstances (as set out below)</p> <p><u>Consistent with National Policy:</u> The emerging policy does not set out clearly how any cash-in-lieu contribution would meet the tests required by legislation.</p> <p>The policy is ambitious however, in our client's opinion, it is currently worded with limited flexibility and consideration upon the different scales and types of development that can come forward and their associated means to incorporate these policy aspirations within proposals. The LPR's supporting Viability Assessment (Autumn 2022) is clear that beyond the affordable housing policy, the sustainable construction and development objectives of the plan, driven through Policy DM4, is the other significant emerging policy with a potential impact upon the viability of development as stated in paragraph 1.1.17.</p> <p>Whilst it acknowledged that the Viability Assessment is at high-level, it is evident in various parts of the assessment that policy DM4 has the potential to impact the deliverability of the Local Plan.</p> <p>Firstly, this is made evidently clear in Appendix I Table G (Policy Analysis) which states that proposed policy DM4 has a 'high' viability impact which has resulted in an allowance being added to base build costs. Furthermore, the associated commentary acknowledges that the policy scope could have further site-specific impacts.</p> <p>In regard to base build costs, it is noted within the Viability Assessment Report that there is a lack of detailed guidance of which to base any additional cost assumptions on. The commentary following paragraph 2.14.4 describes the evolving approach to the assumed levels of cost increase for both residential and non-residential development. The commentary shows under the bullet "<i>Carbon reduction – contributing to the Council's Net Zero ambitions</i>", that despite the relatively short period of time between the stages of the review, assumed costs have increased (from an initial ~4% to +5%). As more detailed evidence becomes available to base assumptions on, it is acknowledged that these assumptions will change however the increase here between assessments is evident and can therefore, on balance, be expected to continue to change.</p> <p>Focusing specifically on non-residential developments, paragraph 3.2.44 of the Viability Assessment makes clear that cost estimates around carbon reduction / zero-carbon developments are not widely available and vary greatly, including by source and scheme type. The Viability Assessment appears to consider what is included at this time (+5% construction costs for non-residential) as a reasonable assumption, despite the report noting that costs could be higher or significantly higher in some cases. Furthermore, the report seems to consider that the potential over cost impacts of these</p>

measures will fall over time based on improved markets, technologies, and efficiencies (paragraph 2.14.5 point-d and paragraph 3.2.45). Whilst there is a probable case for improved efficiencies occurring, our client has concerns regarding the over cost assumptions used and the likelihood that these efficiencies will begin to have significant positive impacts in the near future due to the lack of evidence available. There should also be a consideration that additional inflexible requirements alongside current build cost inflation and environmental requirements will in fact make the market less prospective. Build cost inflation and environmental requirement implications are highlighted in paragraph 2.1.6 of Appendix V for the Viability Assessment as mounting pressures for the market following referenced engagement with market reporters.

Building upon the above context, Appendix IV for the Viability Assessment illustrates the findings stated in paragraph 3.2.42 of the Viability Assessment *that “there are few forms of development that are shown to be clearly and consistently viable”*. Looking specifically at industrial uses, the appraisals show ‘indicative non-viability’ despite the different % yields considered.

Notwithstanding the suggestion in paragraph 3.2.42 that this is not unusual in West Berkshire, or that, in paragraph 3.2.47, “significantly increased sustainable development expectations would be likely in themselves to unduly affect the viability of schemes that are considered to have the demand and viability to drive their progression”, this should not distort the fact that the policy will have impacts on build costs and delivery.

In our client’s opinion it should not be the case that much-needed development which is not proposed to be met by this Local Plan Review (see our client’s representations regarding policies SP20 and SP21 [see comments PS1147 and PS1148]), and is already difficult to bring forward, is made harder to deliver simply based on the assumption that schemes will be delivered if there is the demand and viability to drive their progression. Indeed, if it is not unusual in West Berkshire for viability to be a challenge as stated in paragraph 3.2.42, additional land should be identified to provide confidence and ensure a consistent and deliverable supply should any forthcoming sites encounter difficulties.

In our client’s opinion, with regard to the above it is difficult to see how the current rigid policy wording is effective and will therefore contribute to the delivery of sustainable development in West Berkshire.

Policy Wording

With specific regards to the policy wording, our client has several concerns.

We consider that not all proposals will neither be physically able (in terms of space) or financially able (in terms of viability) to deliver BREEAM Excellent standard buildings and/or renewable, zero or low-carbon energy technologies on site. Whilst ‘where appropriate’ is included in paragraph 10.27 of the supporting text for emerging policy DM4, unless this wording is included in the policy wording, in our client’s opinion the policy would not be effective.

Secondly, reference is made to the ‘energy hierarchy’ throughout the policy and supporting text. However, a description or illustration of the hierarchy does not appear to be evident. For clarity, in our client’s opinion, the LPR should include a diagram or list of the hierarchy so that there is a clear understanding about the approach developers should take.

Thirdly, regrading construction standards for new non-residential development, clarity should be provided as to the nationally recognised standards that should be used to calculate a typical baseline. This will add clarity to policy and ensure it is consistent with paragraph 16 (d) of the NPPF.

Lastly, our client is aware that the proposal under point 4 of emerging policy DM4 – Carbon Offsetting. Our client considers it pertinent to emphasise that any cash contribution sought by West Berkshire through a planning obligation must satisfy the requirements set out in regulation 122 (2) of the CIL Regulations 2010 (see also NPPF paragraph 57). The supporting text for this element of the emerging policy is set out from paragraphs 10.28 to 10.32 of the LPR document. Currently, within the policy and the supporting text it is unclear how any funds raised would be used. Clarity should be added so that it is clear and consistent with national policy.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>With regard to section 2 above, in our client’s opinion, the below changes would add clarity and flexibility to the policy thereby improving its effectiveness and consistency with national policy. Additions are shown underlined, and deletions shown by strikethrough.</p> <p>“Policy DM4 Building Sustainable Homes and Businesses</p> <p>New development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should, <u>where practicable</u>, achieve net zero operational carbon emissions (regulated and unregulated energy) by implementing the energy hierarchy.</p> <p>All proposals should demonstrate application of the energy hierarchy through submission of an Energy Statement or a detailed energy section within the Sustainability Statement in accordance with Policy SP5 and which identifies how the following minimum standards of construction are achieved to the greatest <u>feasible and viable</u> extent feasible and viable.</p>

	<p>1. Residential Development - Minimum Construction Standard</p> <ul style="list-style-type: none"> • New development of one or more new dwellings (C3 or C4 use class) will meet the following minimum standards of construction: • Achieve the carbon Target Emission Rate set by the Future Homes Standard (once this is confirmed by central government); in the meantime, achieve 63% reduction in carbon emissions is achieved by on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2). These regulated carbon emission targets are to be achieved before the addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and • Equal to or less than 15kWh/m2/year space heat demand target, evidenced by the Building Regulations Part L SAP Fabric Energy Efficiency metric. New residential refurbishment developments of 10+ units will meet BREEAM Domestic Refurbishment Excellent as a minimum. <p>2. New Non-Residential Development, Hotels, Residential Institutions, Secure Residential Institutions - Minimum Construction Standard</p> <p>New development of 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or secure residential institutions (C2A use class) will meet the following minimum standards of construction:</p> <ul style="list-style-type: none"> • <u>A demonstrated percentage reduction in energy (regulated and unregulated) carbon emissions based on the appropriate building type baseline calculated using nationally recognised standards (*name of the standards to be inserted*)</u> Appropriate to the building type, calculate a typical building baseline using a nationally recognised standard and demonstrate a percentage reduction in energy (regulated and unregulated) carbon emissions. These operational carbon emission targets are to be achieved before the addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and • Where practicable, BREEAM Excellent (BREEAM 2018 or future equivalent) <p>3. Renewable Energy</p> <p>A. Subsequent to the achievement of the minimum construction standards under parts 1 and 2, new development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should where possible and appropriate include onsite renewable, zero and low carbon energy technologies to achieve, to the greatest extent possible, net zero carbon operational energy (regulated and unregulated) on site.</p> <p>B. The Council will support proposals for renewable energy provided that the technology is:</p> <ol style="list-style-type: none"> Suitable for the location; Not on the most versatile agricultural land (grades 1, 2 and 3a); Is accompanied by a landscape / visual impact assessment; and Would not cause harm to residential amenity by virtue of noise, vibration, overshadowing, flicker or other harmful emissions. <p>4. Carbon Offsetting</p> <p>Where a development proposal of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) and or secure residential institutions (C2A use class) cannot demonstrate that it is net zero carbon in relation operational energy (regulated and unregulated), it will be required to, subject to viability, address any residual carbon emissions by:</p> <ul style="list-style-type: none"> - a cash in lieu contribution based on the national carbon offset price set by the latest HM Treasury Green Book to fund verified carbon offsetting measures in West Berkshire to relevant national standards. <p>The policies supporting text should be reviewed to ensure spelling and grammatical mistakes are removed.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To expand upon the points made within this representation</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1446
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	Yes

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The policy covers building standards, renewable energy developments and carbon offsetting. These are three very different subjects and should be covered by different policies. The subject matter is supported.</p> <p>SA/SEA App 6</p> <p>SA/SEA appraisal for policy DM4 is incorrectly labelled DM3</p> <p>Three objectives are assessed as strongly positive (++) and four as positive (+). None are assessed as negative.</p> <p>However, the overall effect is assessed as “neutral”. This is inconsistent.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The policy should be divided into three policies to cover each of the three subjects separately.</p> <p>SA/SEA - The overall effect should be assessed as positive.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Feltham Properties (Represented by Pro Vision)</p>
<p>Consultee Full Name</p>	<p>Sean Bates</p>
<p>Consultee Organisation</p>	<p>Feltham Properties</p>
<p>Agent Full Name</p>	<p>James Iles</p>
<p>Agent Organisation</p>	<p>Pro Vision</p>
<p>Comment ID</p>	<p>PS754</p>

Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:17:52
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Whilst embracing the Zero Carbon movement, we are concerned that local authorities do not have the capacity to deal with the technical intricacies of drafting standards that are deliverable. This could inadvertently lead to housing delivery issues.</p> <p>We have particular concern with DM4, point 1(A), Residential Development – minimum construction standard, and the practicality/feasibility of complying with the first bullet point, which includes a 63% reduction in carbon emissions.</p>

	<p>We have taken advice from energy specialists and understand that this requirement is completely impractical as most dwellings will not pass current Part L without the addition of PV and whilst this pushes heat pumps to the fore, these are not always suitable for smaller units, where an electric heating/PV combination makes more sense. We are concerned that this policy belies a misunderstanding of Part L and lacks justification for the figure of 63%.</p> <p>As such, we have concern that policy, as drafted, will serve only to frustrate efforts to bring forward sustainable development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>A redrafting of this policy to ensure it is clear, measurable, achievable and justified and so that it does not inadvertently act as a barrier to helping delivery the district's development needs.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Feltham Properties is a reputable local development company and has significant concerns that the policy as drafted will be a barrier to bringing forward development in the district.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Home Builders Federation</p>
<p>Consultee Full Name</p>	<p>Mark Behrendt</p>
<p>Consultee Organisation</p>	<p>Home Builders Federation</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1688</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 4</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Building Sustainable Homes and Businesses</p>
<p>Order</p>	<p>153</p>
<p>Submission Type * E-Mail * Letter * Other * SMS * Web</p>	<p>E-Mail</p>

* Unknown	
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The Council are proposing that all new residential dwellings should achieve net zero for both regulated and unregulated energy by implementing the energy hierarchy. This would require new residential development to deliver a 63% reduction in carbon emission compared to baseline emission rate achieved using 2021 Part L of the Building Regulations prior to the introduction of the Future Homes Standard. In addition, the Council are seeking a target of 15 kwh/m2/year for space heating demand and carbon offsetting via a cash in lieu contribution if homes cannot demonstrate that it is sent zero carbon. The approach being put forward by the Council will in effect require developers to bring forward energy efficiency standards in their new homes that are beyond current building regulation but also those that would be introduced in the Future Homes Standard through the requirement to achieve a target for space heating that matches those required for a Passivhaus.</p> <p>The HBF recognises the need to improve the energy efficiency of new homes and consider that the most effective way of achieving these improvements is through nationally applied standards and not through a variety of different approaches adopted in local plans. Delivering new homes to a variety of different standards in different LPAs increasing costs and reducing the economies of scale that come from building homes to consistently applied national regulations. In particular this has a significant impact on small and medium sized housebuilders and as such could impact on a key sector the government are seeking to encourage and which ensure the greater diversity of housing across the country. The house building industry is not resistant to improving the energy efficiency of new homes and reducing carbon emissions</p>

it merely wants these improvements to be consistent across the country as a whole rather than face different standards in each local planning authority.

We also consider the Council's approach to be inconsistent with that being put forward in policy. Firstly, the Council must consider section 5 of Planning and Energy Act 2008 which states that energy policies in local plans "... *must not be inconsistent with relevant national policy*". Secondly consideration must be given to current Government policy which was first established in the Written Ministerial Statement and then reiterated in paragraph 6-012 of PPG. These two statements set out that Council's should not go beyond a 20% improvement on the 2013 building regulations (an improvement equivalent to the long-abolished level 4 of the Code for Sustainable Homes). Given that this has now been exceeded by Building Regulations it is evident that the Government's intention is to use building regulations as the main focus for change on this matter and this is further reinforced by paragraph 154b of the NPPF states in relation to greenhouse gas emissions that "... *any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards*".

This would suggest that whilst the Government have accepted some uplifts to technical standard can be made through local plans, they are seeking to deliver major changes to energy efficiency standards through building regulations. To some extent the Council would appear to acknowledge this situation by stating that Target Emissions Rates should achieve those set by the Future Homes Standard once it is introduced. However, to then require a space heating demand equivalent to Passivhaus standards means that buildings will still have to go beyond what is expected within Building Regulations once the Future Homes Standard is introduced. The HBF consider that the Government's expectation through the policy framework is that Council's do not seek to go beyond the requirements that are set out in current and future Building Regulations. As such

the Council must amend this policy to remove reference to achieving standards beyond those required by Building Regulations.

It is important to recognise that the development of the Future Homes Standard has included and been supported by the house building industry, energy and water providers, bodies such as RSPB and three Government departments. The framework developed will ensure that the transition to zero carbon homes is feasible whilst maintaining house building levels that can address the current housing crisis facing the country. To then place additional requirements with regard to such matters is unnecessary and unjustified.

Whilst we do not consider the policy to be sound, if the Council are to continue with this approach, we would recommend that more clarity on flexibility is included in the policy where this would result in a development becoming unviable. At present the second paragraph refers to both feasibility and viability but it is not clear as to how a decision maker should react where it is not possible to meet these standards. Therefore, if these policies are to be retained greater clarity as to flexibility in their application is required.

Finally, the policy requires a payment to be made where net zero cannot be achieved. The HBF considers such policies to be inconsistent with national policy which makes no reference to offsetting of residual carbon emissions from both unregulated and regulated energy. In particular development should not be required to offset unregulated energy. Housebuilders cannot dictate how individuals use their homes once they are occupied, the number of appliances they use, and the energy efficiency of those appliances. As such any reference to unregulated energy use in this policy should be deleted as it is not in the control of the developer.

Costs of meeting zero carbon standard.

The Council's viability study to support the LPR suggests that the evidence on the cost of achieving zero carbon in relation to regulated and unregulated emissions is between 7 and 11% of build costs. However, in the latest tests the Council have included a +5% build cost allowance on the basis that costs will reduce over time as efficiencies improve. This may be the case but in the short term it would appear to be the case that these costs will be higher, and viability should be tested against these costs not on future efficiencies. It is also not clear as to how the potential cost of carbon offsetting has been included in these estimates.

Conclusion on net zero operational carbon

In brief the HBF are concerned that the higher level of energy efficiency standards being proposed by the Council go well beyond what is being proposed by the Government and we say beyond the intention of its stated position in PPG. The Government have set out its intentions with regard to the Future Homes Standard from 2025 which will provide a significant improvement to the energy efficiency of new homes, a process that allows for the decarbonisation of the grid to transition homes net zero. Given that the Future Homes Standard will be challenging for the industry to deliver nationally there will be difficulties at the same time in achieving the Council's more stringent requirements. As such the HBF consider the policy to be unsound as it is unjustified to push for a more stringent target than that set out by a careful dialogue between Government and a range of stakeholders.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	<p>Yes</p>

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1369
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	There should be a definition of net-zero as interpretations can vary.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thakenham Homes
Consultee Full Name	Craig Pettit
Consultee Organisation	Thakenham Homes
Agent Full Name	
Agent Organisation	
Comment ID	PS1610
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Policy DM4 (Building Sustainable Homes and Businesses) – Thakeham has a number of concerns with this Policy and its supporting text. Firstly, operational carbon emissions are usually defined through regulated energy consumption, as unregulated energy consumption is impossible to accurately predict, and its verification post-occupation is not something the Council are going to be able to administer, and neither is the housebuilding industry ready to conduct this monitoring.</p> <p>Thakeham supports the requirement for on-site renewables, however only in the form of regulated energy only, which takes into consideration the trajectory of the decarbonisation of the national grid to play its part in the transition of every home's electricity use to be Net Zero. However, by including unregulated energy, we believe that the cost and embodied carbon impact will affect viability for all developers.</p> <p>Thakeham supports the Future Homes Standard approach to Net Zero Ready, and have already committed that from 2025, every Thakeham home we complete will be Net Zero carbon in operational emissions, as defined by regulated energy consumption using the SAP calculator. Thakeham considers that the Council should follow this approach, and therefore not take into consideration unregulated energy when defining carbon emissions.</p> <p>Moreover, the higher level of energy standards sought by draft Policy DM4, in our view, go beyond national policy and the Government's future intentions. Thakeham would therefore welcome the Council's thoughts as to whether it considers draft Policy DM4 satisfies the tests of soundness, as drafted.</p> <p>Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council's evidence underpinning certain policies is strong, in others it is notably weak.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Terцерio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1154
Chapter / Policy / Appendix Number	Policy DM 4
Chapter / Policy / Appendix Title	Building Sustainable Homes and Businesses
Order	153
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	No

<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Policy DM4 'Building Sustainable Homes and Businesses' appears to relate to uses under Class C of the Town and Country Planning (Use Classes) Order 1987 (as amended). However, in the absence of a definition for 'businesses' under this Policy, it is not clear if the word 'businesses' refers only to those businesses under Class C (such as hotels) or if the Policy covers other commercial uses under Classes B, E and F.</p> <p>As such, in the interests of clarity, we recommend that the Council separates this Policy into two different Policies, covering Class C uses and non-residential development respectively.</p> <p>In addition to the above, whilst we support the Council's need to tackle climate change, we question the effectiveness of Policy DM4 as currently worded.</p> <p>However, point 4 of Policy DM4 refers to carbon offsetting and states that a cash in lieu contribution can be provided. The supporting text for this element of the emerging policy is set out from paragraphs 10.28 to 10.32 of the Draft Local Plan. Although we do not object to the carbon-offsetting payment currently, within the policy and the supporting text it is unclear how any funds raised would be calculated and used. We suggest that the supporting text includes information setting out how the Council will calculate the price for offsetting carbon. We recommend that when setting a cost for carbon, the Council develops and publishes a price for offsetting carbon based on either: a nationally recognised carbon pricing mechanism; or the cost of offsetting carbon emissions across the LPA. The price set should not put an unreasonable burden on development and must enable schemes to remain viable.</p> <p>Furthermore, clarity should be provided in terms of where the cash in-lieu payment will be used. In our view, it would be beneficial to allow flexibility such that offsetting contributions can be used by the same business / reinvested in business operations.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>In light of the above discussions, we consider that the Council should review the above Policy and its supporting text to clarify the following:</p> <ul style="list-style-type: none"> - Include information regarding setting out how the Council will calculate the price for offsetting carbon; - Provide further clarity in terms of where the cash in-lieu payment will be used.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>

Policy DM 5 Environmental Nuisance and Pollution Control

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS198
Chapter / Policy / Appendix Number	Policy DM 5
Chapter / Policy / Appendix Title	Environmental Nuisance and Pollution Control
Order	155
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We acknowledge that developments should not lead to adverse effects on pollution of the environment however we do not support the requirement in points e and f of the draft policy with regard to tranquility, light spill and glare. These requirements may result in additional technical work for planning applications, in particular small-scale minor developments, which could add unnecessary additional costs and delays thus impacting the viability of development. In addition, the requirement to preserve tranquility of sites is reflective of the policy requirements in the AONB, as set out in draft Policy SP2. This is considered to be extremely onerous for development proposals outside of this protected landscape. We therefore suggest that points e and f in this draft policy are deleted.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We therefore suggest that points e and f in this draft policy are deleted.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1307
Chapter / Policy / Appendix Number	Policy DM 5
Chapter / Policy / Appendix Title	Environmental Nuisance and Pollution Control
Order	155

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes

Please give reasons for your answer	<p>I support the inclusion of obtrusive light in Policy DM5 on Environmental Nuisance and Pollution Control. The ILP Guidance note on 'Reduction of Obtrusive Light' is an appropriate and proportionate technical basis for this policy.</p> <p>My reservation is the absence of any guidance on the which Zone in Table 6 "ILP environmental zone for exterior lighting control" applies to different parts of West Berkshire. This will make the determination of this planning application somewhat subjective, and therefore open to challenge.</p> <p>It could be a substantial task to develop a definition that is applicable to all locations in West Berkshire, but it may be feasible to make a definition that is applicable to the great majority of applications, especially outside the AONB. For example:</p> <p>E4, Urban: Business districts of Newbury and Thatcham</p> <p>E3, Suburban: Within those settlement boundaries or areas of employment land that are outside the AONB</p> <p>E2: Remainder of the area outside the AONB</p> <p>Within the AONB: decided on a case-by-case basis.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	West Berkshire Council should consider providing guidance on which environmental zone for exterior lighting control is applicable to different parts of West Berkshire, either in this Policy or an SPD.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	If it would assist the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1447
Chapter / Policy / Appendix Number	Policy DM 5
Chapter / Policy / Appendix Title	Environmental Nuisance and Pollution Control
Order	155
Submission Type * E-Mail	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a	No

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1547
Chapter / Policy / Appendix Number	Policy DM 5
Chapter / Policy / Appendix Title	Environmental Nuisance and Pollution Control
Order	155
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>We previously stated that there should be a policy requiring robust evidence regarding investigation and remedial measures to prevent discharge to groundwater aquifers through land affected by contamination. We have reviewed Policy DM5 Environmental Nuisance and Pollution Control and some texts should be included in the policy to ensure that ground and surface waters are protected from pollution as required by national policy- NPPF section 15.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>We previously stated that there should be a policy requiring robust evidence regarding investigation and remedial measures to prevent discharge to groundwater aquifers through land affected by contamination. We have reviewed Policy DM5 and section 10.49 of the justification notes for policy DM5 it states; “<i>To this end, appropriate conditions may be imposed requiring certain remedial measures prior to construction or appropriate design and wastewater management schemes.</i>”</p> <p>Whilst this is satisfactory, we suggest the following wording instead of the current wording; (changes in red):<u>[underlined]</u></p> <p><i>‘To this end, appropriate conditions may be imposed requiring certain remedial measures prior to construction <u>and or appropriate design of and</u> wastewater <u>and surface water run-off</u> management schemes.’</i></p> <p>This is to ensure all sensitive water resources and controlled waters are protected which is consistent with paragraphs 170 and 178 of the NPPF. Secondly Section 1.23 provides details regarding evidence base which supports the policies in the local plan. We note that there is no information on groundwater protection needs within the Evidence Base. The Evidence Base includes the Brownfield Register which gives an indication of where the land has been used for activities that may have caused contamination of the land. However, information on details/assessments prepared to protect associated groundwater resources is also required and whilst an assessment has not been carried out, it is important to ensure through policy that ground and surface waters are protected from pollution. This is due to high risks to groundwater quality within West Berkshire, particularly given the River Lambourn Nutrient Neutrality Zone. Also a Chalk stream, the River Lambourn and tributaries are highly dependent on groundwater</p>
<p>5. Independent Examination - If your representation is seeking a</p>	Yes

<p>change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	<p>We wish to attend the examination for an opportunity to explain the need for sensitive water resources and controlled waters to be protected which is consistent with national policy.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Policy DM 6 Water quality

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Green Park Reading No.1 LLP (GPR) (Represented by Deloitte)
Consultee Full Name	Green Park Reading No1. LLP (GPR)
Consultee Organisation	Green Park Reading No.1 LLP (GPR)
Agent Full Name	Phil Wright
Agent Organisation	Deloitte
Comment ID	PS1225
Chapter / Policy / Appendix Number	Policy DM 6
Chapter / Policy / Appendix Title	Water quality
Order	157
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:50:00
Attached Files	Deloitte obo Green Park Reading No1 LLP_Figure 1.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>West Berkshire Local Plan Review to 2039 – Regulation 19 Proposed Submission Consultation</p> <p>We write on behalf of our client Green Park Reading No.1 LLP, which is the owner of Green Park. Green Park Reading No.1 LLP (“GPR”) is ultimately wholly owned by Mapletree Investments Pte Ltd (“Mapletree”). This response relates to the Regulation 19 Proposed Submission Consultation of the West Berkshire Local Plan Review (“the LPR”), which is open for comment until 3 March 2023. Deloitte previously responded to two Regulation 18 Consultations on behalf of GPR on 21 December 2018 and 5 February 2021.</p> <p>In writing this letter, we do so under the statutory provisions of a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>Background to Green Park</p> <p>Since acquiring GPR in 2016, Mapletree has been reviewing the Park’s potential, undertaking asset management and considering future opportunities. GPR is keen to support the Council in achieving sustainable development in the Borough.</p> <p>Green Park is a premier business park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of the three local authority areas, covering a 79-hectare plot offering high quality office stock and associated amenities, located around a central body of water.</p> <p>Green Park is accessed from the A33 relief road and is located south of Reading town centre. The Park is home to a variety of office occupiers across a range of business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.</p> <p>The Park continues to be highly successful with ongoing interest from both global and smaller companies for office space. In 2016/17, Aukett Swanke undertook a refresh of the Fosters masterplan prepared in 1998 in order to update the development potential of the Park. Mapletree continue to look for opportunities to respond to market demand and manage the planned growth of the Park in a sustainable way. Securing an allocation for employment uses on land at 900 South Oak Way forms part of this ambition (referred to hereafter as the Site (see Figure 1 below)).</p> <p><i>[See attached map - Deloitte obo Green Park Reading_Figure 1]</i></p> <p>Previous Response to Regulation 18 Draft Local Plan</p> <p>On behalf of GPR, Deloitte submitted formal representations in response to the LBW Pre-Publication (Regulation 18) Draft Local Plan on 21 December 2018 and 5 February 2021. As part of the previous consultation, GPR proposed a series of changes, including the below:</p> <ul style="list-style-type: none"> • Requested that Green Park was included as a Designated Employment Area; • Requested an emphasis on the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park; • Requested support for Data Centres; and, • Requested clarification be added to Policy SP 4 that although the Office for Nuclear Regulation will be consulted, it is unlikely this will restrict non-residential development in the Detailed Emergency Planning Zone (DEPZ). <p>Local Plan Regulation 19 Response</p> <p><u>Policy DM6: Water Quality</u></p> <p>Policy DM6 requires proposals for built development to be <i>“at least 10 metres away from the top of the bank of the nearest watercourse or main river, providing or retaining a natural/semi-natural habitat buffer”</i>. GPR recognises the importance of protecting the quality and biodiversity of watercourses. However, a blanket buffer zone of 10 metres is restrictive to sustainable development and does not allow flexibility to promote high quality development that can enhance the biodiversity and quality of watercourses. GPR notes that in the supporting text there is a reference to the Strategic Flood Risk Assessment (2021) which states that no development should be within 10 metres from the top of a main river, but then recommends that this is applied to all watercourses.</p> <p>The majority of the built plots in Green Park are located close to Foudry Brook, with some, including 100 Longwater Avenue, close to this 10 metre distance. These have successfully mitigated any risk of flooding and have been found acceptable in planning terms. GPR therefore recommends that given the recognition that the requirement mostly applies to main rivers, additional flexibility is incorporated for smaller water bodies, especially where it can be demonstrated that flood risk can be adequately mitigated.</p> <p>Summary</p> <p>In summary, GPR welcomes the West Berkshire LPR and the published Regulation 19 document. However, GPR requests several modifications to the LPR as set out in this letter. In particular, GPR</p>

	requests that the identified Site is classified as a Designated Employment Area to reflect its existing uses and its existing allocation, and that additional guidance is given in relation to the consultation process and considerations for development located within a DEPZ.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1448
Chapter / Policy / Appendix Number	Policy DM 6
Chapter / Policy / Appendix Title	Water quality
Order	157
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	Policies supported
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1548
Chapter / Policy / Appendix Number	Policy DM 6
Chapter / Policy / Appendix Title	Water quality
Order	157
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	We have reviewed policy DM6 – Water Quality and additional wording and some amendments to the policy justification texts are required to ensure sensitive water resources and controlled waters are protected which is consistent with paragraphs 170 and 178 of the NPPF.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.
<p>4. Proposed Changes</p>	<p>We suggest the following additional wording like that of section 10.59 to be included in the justification text of policy DM6.</p> <p><i>'Most foul water is removed from a development site by a mains sewer. However, where this is not the case, foul water is usually treated on site and then discharged either to ground to filter away from the site, or into a nearby watercourse. If the treated water is discharge to ground, it has the potential to impact on water quality sensitive features, particularly by increasing the already high nitrate concentrations. The Environment Agency's publication 'General binding rules: small sewage discharge to groundwater (2021) stipulates that the general binding rules can only be met if the discharge is less than 2 cubic metres per day and via a shallow drainage field located, designed, and constructed in line with the recommendations in British Standard BS 6297:2007. If it is identified that a planning application could affect groundwater, the potential impact on water quality will need to be investigated and include a mitigation strategy which demonstrates how the applicant will reduce the negative effects of their proposal and show how they will implement risk reduction measures.'</i></p> <p>An alteration of the wording of the penultimate bullet point is required since contaminated land has a specific meaning in legislation. We suggest the following:</p> <p><i>works to restore <u>land contamination</u> contaminated-land where applicable;</i></p> <p>This is to ensure sensitive water resources and controlled waters are protected which is consistent with paragraphs 170 and 178 of the NPPF.</p> <p>In support of the above point made, we are pleased to see in section 10.62 of Policy DM6, Water quality the inclusion of the following text as requested previously; <i>"Developments should allow sufficient shallow drainage areas if infiltration is to be used. The use of deep soakaways for infiltration (e.g. boreholes) are not a recognised SUDS solution and may be refused a permit. This is to protect groundwater quality."</i></p> <p>We mentioned previously that the SSSIs and SAC designations need extra standards of Common Standards Monitoring (CSM), which sets higher standards than WFD for water quality. This has not been mentioned in the plan. We ask that this is included/added in the plan to ensure the designated areas meet the higher water quality standards which are set compared the Water Framework Directive. The River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain are globally important chalk streams.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes

5. Independent Examination	We wish to attend the examination for an opportunity to explain the need for these sensitive water resources and controlled waters in West Berkshire to protected which is consistent with paragraphs 170 and 178 of the NPPF.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1560
Chapter / Policy / Appendix Number	Policy DM 6
Chapter / Policy / Appendix Title	Water quality
Order	157
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>We stated in our response at the regulation 18 consultation that a standalone water course policy should be included in this local plan. This is to provide more protection for the water environment in West Berkshire as required by NPPF Section 15. This is particularly important given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain.</p> <p>There are some nearby local authorities which have specific wording protecting water bodies such as the below which we refer the LPA to, to assist in drafting a watercourse protection policy.</p> <ul style="list-style-type: none"> • South Oxfordshire Local Plan 2011 – 2035: adopted Dec 2020 (Particularly Policy ENV4: Watercourses) SODC-LP2035-Publication-Feb-2021.pdf (southoxon.gov.uk) • Vale of Aylesbury Local Plan (VALP) 2013 – 2033: adopted September 2021. Particularly Policy NE2: River and Stream Corridors Vale of Aylesbury Local Plan (VALP) (buckinghamshire-gov-uk.s3.amazonaws.com)
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>We have referred the LPA to some good examples polices to assist with drafting a watercourse protection policy. We are happy to work with the LPA to write this policy. The below should be considered when this policy is being written.</p> <p>Any development which contains or is adjacent to a watercourse need to provide a buffer zone of at least 10 metres, measured from the top of the bank. This buffer zone needs to be provided on both sides of any watercourse. There is a particularly important need for this in this area as there is several protected sites in West Berkshire local authority. Only in exceptional circumstances such as urbanisation where, providing a 10 m buffer may be challenging should a smaller buffer be negotiated and be permitted if there is sufficient biodiversity enhancement, and a plan is agreed with the local planning authority. Otherwise, and as a last resort, biodiversity net gain will need to be provided off-site.</p> <p>This buffer zone should be planted with native species of plants and be free from any type of development, including parking spaces and domestic gardens. There should be a plan provided of how the buffer zone will be maintained for the short, medium and long term. This should be in the form of a Construction Environment Management Plan which should be agreed with the local planning authority before commencement of development.</p> <p>The above is important because buffer zones provide habitat and an ecological corridor for species to be able to move between habitats with ease, as well as contributing to biodiversity net gain. Buffer zones allow rivers to go through natural processes such as erosion and deposition of material, which also contributes to the promotion of natural processes of the watercourse.</p>

	Options to de-culvert watercourses should be actively pursued. Culverting has a significant impact on the ecology of the watercourse. Planning permission will only be granted for proposals which do not involve culverting of watercourses, and which do no prejudice future opportunities for de-culverting.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to attend the examination for an opportunity to explain the need for a stand-alone watercourse protection policy due to the unique nature of the water environment - (includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats) in West Berkshire.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 7 Water Resources and Waste Water

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Town and Manor of Hungerford
Consultee Full Name	Chris Scorey
Consultee Organisation	Town and Manor of Hungerford
Agent Full Name	
Agent Organisation	
Comment ID	PS221
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 13:00:00
Attached Files	TownandManor of Hungerford attachment
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We do not regard it as justified to apply a safeguarding provision to land owned by the Town and Manor of Hungerford charity, without prior consultation and despite the existence of a more suitable alternative site for future upgrades to the Waste Water Treatment Works at Hungerford.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The Proposed Submission states that “land adjacent to the Hungerford Waste Water Treatment Works (as shown on the plan below), will need to be safeguarded to enable upgrades to the Waste Water Treatment Works to serve future growth” We do not regard this proposal as “sound” for the reasons given below. <for map see attachment></p> <p>The land in question is owned by the Town and Manor of Hungerford and has ancient Commoners’ rights dating back many centuries. It is one of the few parking areas on Hungerford Common and is widely used by walkers and fishermen including members of the Hungerford Canal Angling Association. It is also used by organisations running events on the Common, by contractors working for Thames Water and by Network Rail who have a licence to use it for track access and parking.</p> <p>The Town and Manor owns a parcel of land to the east of the Sewerage Works as outlined in red on the plan below, which we suggest would be far more suitable for safeguarding and future expansion of the Works. This land is not used by the general public, is larger and is only accessible via the Sewerage Works. It is already licensed on an annual basis to Thames Water. The land has no agricultural value and may well be categorised as “brownfield”, having been the site of the town rubbish dump in past centuries. <For map see attachment></p> <p>We request that reference to our car park being identified for safeguarding by the West Berkshire Phase 2 Water Cycle Study (2021) be removed and replaced by reference to our alternative site and with a reviewed plan showing the eastern site.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Ridgepoint Homes Ltd</p>
<p>Consultee Full Name</p>	<p>Miss</p>

	Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS199
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	Yes

* Yes * No	
Please give reasons for your answer	With regard to the requirement in point b of the draft policy which references making efficient use of water through recycling measures, grey water recycling would likely to result in an average additional cost of £4,000 per plot for houses and £3,000 per plot for apartments as well as additional future maintenance and management costs. This could become unviable for certain developments whereas rainwater harvesting is easily achievable without any significant additional costs and typically forms part of SUDS scheme. We therefore suggest that point b is amended to state "measures such as rainwater harvesting and where feasible, grey water recycling".
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area. In regard to the second requirement under point A in part 1, the equal to or less than 15 kWh/m2/ year space heat demand target is unachievable. This would likely require different methods of construction to achieve this target which would ultimately result in additional costs that could impact development viability. We therefore suggest that this second point is deleted.
4. Proposed Changes	We therefore suggest that point b is amended to state "measures such as rainwater harvesting and where feasible, grey water recycling".
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hungerford NDP
Consultee Full Name	Ms Denise Gaines
Consultee Organisation	Hungerford NDP
Agent Full Name	
Agent Organisation	
Comment ID	PS1234
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
Submission Type * E-Mail * Letter	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 10:16:00
Attached Files	PS1234 Hungerford NDP attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Hungerford 2036 group concurs with the reasons given by Hungerford Town and Manor that we also do not regard it as justified to apply a safeguarding provision to land owned by the Town and Manor of Hungerford charity, without prior consultation and despite the existence of a more suitable alternative site for future upgrades to the Waste Water Treatment Works at Hungerford.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	The Proposed Submission states that "land adjacent to the Hungerford Waste Water Treatment Works (as shown on the plan below), will need to be safeguarded to enable upgrades to the Waste Water

	<p>Treatment Works to serve future growth" We do not regard this proposal as "sound" for the reasons given below.</p> <p><for map see attachment></p> <p>The land in question is owned by the Town and Manor of Hungerford and has ancient Commoners' rights dating back many centuries. It is one of the few parking areas on Hungerford Common and is widely used by walkers and fishermen including members of the Hungerford Canal Angling Association.</p> <p>It is also used by organisations running events on the Common, by contractors working for Thames Water and by Network Rail who have a licence to use it for track access and parking. The Town and Manor owns a parcel of land to the east of the Sewerage Works as outlined in red on the plan below, which we suggest would be far more suitable for safeguarding and future expansion of the Works.</p> <p>This land is not used by the general public, is larger and is only accessible via the Sewerage Works. It is already licensed on an annual basis to Thames Water. The land has no agricultural value and may well be categorised as "brownfield", having been the site of the town rubbish dump in past centuries.</p> <p><for map see attachment></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Water
Consultee Full Name	Thames Water
Consultee Organisation	Thames Water Utilities Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS958
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail
Response Date	28/02/2023 17:14:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant?</p> <p>* Yes</p>	

* No	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p>We generally support Policy DM7 as it is in line with our previous consultation responses. However, we think it should be improved in line with the following detailed comments:</p> <p>Water Efficiency</p> <p>Policy DM7 in relation to water efficiency is supported in principle, but needs to be strengthened to ensure the water efficiency standard of 110 litres per person per day is met.</p> <p>The Environment Agency has designated the Thames Water region to be an area of "serious water stress" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p>

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. We therefore support Policy DM7 in referring the use of planning conditions. However, clarification should be provided in relation to the preferred 'Fittings Approach'.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

We therefore consider that text in the policy should be amended as set out below.

Water and Wastewater Infrastructure

We support the policy DM7 in principle.

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: "*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*"

Paragraph 11 states: "*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: "*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...*"

Paragraph 26 of the revised NPPF goes on to state: "*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...."*

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "*Adequate water and wastewater infrastructure is needed to support sustainable development"* (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

Supporting paragraph 10.70 indicates that developers will be expected to fund network upgrades – this requires clarification. The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Paragraph 10.70 should therefore be amended accordingly.

Information on how off site network reinforcement is funded can be found here

<https://developers.thameswater.co.uk/New-connection-charging>

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply and network infrastructure both on and off site;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:

<https://www.thameswater.co.uk/developers/>

[larger-scale-developments/planning-your-development/](https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/)

[water-and-wastewater-capacity](https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity)

In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We therefore recommend Policy DM7 is amended as set out below.

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.

Hence, a further text should be added to Policy DM7 as set out below.

Development within the vicinity of Sewage Treatment Works (STW)

The new Local Plan should assess impact of any development within the vicinity of existing sewage treatment works (STW) in line with the Agent of Change principle set out in the NPPF.

Where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

Paragraph 174 of the NPPF, February 2021, sets out that: "Planning policies and decisions should contribute to and enhance the natural and local environment by: ...e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."

Paragraph 185 goes on to state: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution

	<p>on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”</p> <p>The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: “Plan-making may need to consider: ...whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).”</p> <p>The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer.</p> <p>Hence, Policy DM7 should include reference in policy that development within the vicinity of existing sewage treatment works should be assessed in relation to impact on amenity in line with the Agent of Change as set out below.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>Policy DM7</i> <i>Water Resources and Waste Water</i></p> <p><i>Development will be required to minimise water use and aim to be water-neutral as far as practicable by incorporating appropriate water efficiency and water recycling measures. A collaborative approach is encouraged between the Council, statutory agencies, water companies and site promoters / developers to promote innovation in water efficiency and re-use within and outside of dwellings and commercial buildings, including demand reduction to improve longer term water resilience. Liaison with other local authorities is expected where relevant.</i></p> <p><i>Development will be required to be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the ‘Fittings Approach’ in table 2.2 as set out in Building Regulations part G2. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</i></p> <p><i>New or replacement non-residential development of 1000sqm gross floor area or more will meet BREEAM ‘excellent’ standards for water consumption (with at least a 40% improvement in water consumption against the baseline performance of the building), unless demonstrated not to be practicable.</i></p> <p><i>Both of the above apply unless it can be demonstrated that it would not be feasible on technical or viability grounds. Where subsequent national standards exceed those set out above, the new national standards will be applied.</i></p> <p><i>Development proposals should satisfactorily demonstrate the following criteria:</i></p> <p><i>a. There is adequate water supply and waste water treatment infrastructure capacity resources are available, or can be provided, to support the development proposed at the time of occupation, and will be safeguarded from the potential impacts of development;</i></p> <p><i>b. Efficient use of water is made through recycling measures such as rainwater harvesting and grey water recycling;</i></p> <p><i>c. Foul water treatment and disposal of adequate design and capacity already exists or can be provided in time to serve the development ensuring that the environment and amenity of local residents are not adversely affected. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development;</i></p> <p><i>d. Foul water flows produced by the development will be drained separately from surface water run off to a suitable point of connection to a public foul sewer or, for non mains drainage proposals, where there would be no detrimental impact on the environment;</i></p> <p><i>e. Suitable land and access is safeguarded for the maintenance and treatment of water resources and wastewater, flood defences and drainage infrastructure; and</i></p> <p><i>f. It will not adversely impact the water quality, ecological value or drainage function of water bodies in the District, including any adverse impacts on Source Protection Zones (SPZ).</i></p>

	<p>Development which would overload available facilities and create or exacerbate problems of flooding or pollution will not be permitted. Where upgrades to water supply and waste water are required consideration should be given to phasing the development so that the necessary infrastructure is in place.</p> <p>The West Berkshire Phase 2 Water Cycle Study (2021) identifies that land adjacent to the Hungerford Waste Water Treatment Works (as shown on the plan below), will need to be safeguarded to enable upgrades to the Waste Water Treatment Works to serve future growth.</p> <p><u>The development or expansion of other water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.</u></p> <p><u>When considering sensitive development, such as residential uses, close to a Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided."</u></p> <p>-</p> <p>Supporting paragraph 10.70 indicates that developers will be expected to fund network upgrades – this requires clarification. The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1449
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1280
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	No

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The policy admits that West Berkshire District is part of a “severely water stressed area” but accepts the Building Regulations reduced standard supply rate for new developments of 110l/p/d maximum as adequate.</p> <p>We are aware that other parts of the south and south east have adopted 100L/p/d as the standard, with 80L/p/d for strategic sites.</p> <p>We therefore believe that the Council needs to work with other statutory bodies (EA & Thames Water, also NE) and the building industry to demonstrate that this higher standard is appropriate as Local Plan policy for West Berkshire. This would help in several ways:</p> <ol style="list-style-type: none"> 1 Reduce waste water volumes; 2 Encourage grey water recycling, which could assist SUDS and reduce surface water network volumes; 3 Reduce the need for more reservoirs within the Thames Water severely stressed area; 4 Help protect chalk streams and aquifers from excess abstraction. <p>Failure to explore this would seem to show this policy is unsound in every sense.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The fact that this has not been explored fully, and with Thames Water in particular, indicates a failure to exercise the Duty to Cooperate.</p>
<p>4. Proposed Changes</p>	<p>In the second paragraph of the policy, after “...Regulations G2.” Add this sentence:- “For strategic sites a higher standard of 80l/p/d will be sought.”</p> <p>In supporting text 10.69, after “Phase 2 (2021)” at end, add “, which recommended consideration of an even more stringent target, particularly for strategic sites.”</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>We strongly believe the JBA Stage 2 report needs following up and will be seeking to engage urgently with Thames Water and the development industry on this matter.</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thattham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thattham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1666
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The West Berkshire Water Cycle Study – Phase 2, prepared by JBA Consulting states:</p> <p>“Both Water Resource Zones in the study area are classed as being under serious water stress – justifying the more stringent target of 110 l/p/d under building regulations.</p> <p>WBC may want to consider going further than the 110l/p/d water efficiency target particularly in larger strategic developments.</p> <p>Policies to reduce water demand from new developments, or to go further and achieve water neutrality in certain areas, could be defined to reduce the potential environmental impact of additional water abstractions in West Berkshire, and also help to achieve reductions in carbon emissions.”</p> <p><i>(The recommendation in the second sentence occurs in three places in the document, on pages 5, 21 and 87)</i></p> <p>This recommendation should have been considered as part of the Strategic Environmental Assessment. Policy DM7 in the draft Local Plan states:</p> <p>“All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations part G2.”</p> <p>The assessment of this policy in the SA/SEA Environmental Report November 2022 states:</p> <p>“This is a new policy proposed for inclusion in the LPR. A Water Cycle Study (WCS) was carried out in response to comments made by the Environment Agency during the Regulation 18 consultation. The policy reflects the findings of the WCS, which highlights West Berkshire as are area of serious water stress. No other alternatives have been considered. A summary of the SA/SEA of the policy wording is included in table x [sic] below.” <i>(our emphasis)</i></p> <p>The detailed assessment of Policy DM7 in Appendix 6 of the SA/SEA also makes no mention of the recommendation to consider going further than the 110l/p/d water efficiency target.</p> <p>Therefore, the recommendation of JBA Consulting in the Water Cycle Study has not been properly considered.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>West Berkshire Council should undertake a proper environmental assessment of the target for water usage efficiency. Depending on the conclusions of that assessment, it should reduce the water efficiency target in Policy DM7.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes

5. Independent Examination	<p>Thattham Town Council is the principal representative body of the community of Thattham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through 'main modifications'. If, however, the Inspector is minded to consider recommending 'main modifications' to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1691
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes	No

* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Elements of the policy are unsound as the are inconsistent with national policy and unjustified. The HBF recognises that there will be a need for homes in water stressed areas to be built to higher optional standards. However, the Council should not be asking development to aim for water neutrality as outlined in the opening sentence of this policy. As the Council notes in order to achieve neutrality will require reductions in water use in other buildings across the Borough. This is not in the gift of the development industry to deliver but, as indicated in the policy, for the Council to work with other partners to achieve. We would therefore suggest that the "... and aims to be water neutral as far as practicable by incorporating appropriate water efficiency and water recycling measures" is deleted. We would also recommend that the opening paragraph of the policy is moved to the supporting text as it is more of an objective than a policy against which an application will be determined.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	Yes

* Yes	
* No	
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1574
Chapter / Policy / Appendix Number	Policy DM 7
Chapter / Policy / Appendix Title	Water Resources and Waste Water
Order	158
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We asked previously for the Chieveley, Hungerford and Newbury WWTW to be mentioned/included in the plan.</p> <p>The draft plan states that, these need to be upgraded as stated in section 10.71:</p> <p><i>"In order to allow for water and wastewater infrastructure delivery national planning guidance stipulates that phasing new development should be considered to ensure that the 'infrastructure will be in place <u>when and where needed</u>'. As the Water Cycle Study (Phase 2) (2021) is showing the need for upgrades it may be necessary for development to be phased in West Berkshire to allow for the delivery of this infrastructure."</i></p> <p>However further details such as the timeline and approach to ensure these improvements meet the needs of upcoming developments have not been provided. Developments proposed across the plan period should not outpace required wastewater infrastructure provision or improvements. Developments should not go ahead when there is no wastewater drainage infrastructure in place or when the existing infrastructure will still be exceeding their permit limit.</p> <p>The justification text in section 10.71 should therefore be amended to read;</p> <p><i>"In order to allow for water and wastewater infrastructure delivery national planning guidance stipulates that phasing new development should be considered to ensure that the 'infrastructure will be in place <u>when and where needed and provided through the timely provision of new, or the enhancement of existing necessary strategic and local infrastructure to ensure that infrastructure is in place and available prior to the occupation of all developments</u>.' As the Water Cycle Study (Phase 2) (2021) is showing the need for upgrades it may be necessary for development to be phased in West Berkshire to allow for the delivery of this infrastructure."</i></p> <p>Policy text 'a' of Policy DM7 should also be amended to read;</p> <p><i>'There is adequate water supply and wastewater treatment infrastructure capacity resources are available, or can be provided, to support the development proposed <u>at the time of occupation prior to the occupation of all developments</u>', and will be safeguarded from the potential impacts of development;'</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS201
Chapter / Policy / Appendix Number	Policy DM 8
Chapter / Policy / Appendix Title	Air Quality
Order	160
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Whilst we support the requirement for development to maintain, and where possible, improve air quality, we do not support point iii of this draft policy which requires an Air Quality Assessment for developments involving more than 100 parking spaces outside of an AQMA or 50 spaces within or close to an AQMA. Given the Council's current and proposed parking standards, this requirement generally would apply to developments of a minimum of circa 30 units with 100 parking spaces or a minimum of circa 20 units with 50 parking spaces, subject to housing mix.</p> <p>Government guidance states that air quality impacts may need to be considered for developments that would, inter alia, lead to changes in vehicle-related emissions in the immediate vicinity of the development or further afield. We do not agree that it could be reasonably said that developments of this size could result in significant changes in vehicle-related emissions as to justify the requirement for an air quality assessment based on parking provision only. We therefore suggest that point ii of this policy is deleted.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
<p>4. Proposed Changes</p>	We therefore suggest that point ii of this policy is deleted.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	N/A
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Jarman, Alastair
<p>Consultee Full Name</p>	Mr Alastair Jarman
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS361

Chapter / Policy / Appendix Number	Policy DM 8
Chapter / Policy / Appendix Title	Air Quality
Order	160
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	28/02/2023 18:05:03
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	SP16 is in conflict with DM8 para e. e) It does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people; By changing the sustainable transport link via Warren Road to a main access route, vulnerable users will be subjected to additional air pollution. In particular PM2.5 which is now linked to major health and

	development issues in young people. With 2 schools and 2 churches in this area already, and additional school planned, this seem both counter intuitive and irresponsible.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Warren Road should remain a green link to SP16 development.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1450
Chapter / Policy / Appendix Number	Policy DM 8
Chapter / Policy / Appendix Title	Air Quality
Order	160
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	PS1450 Cllr Alan Macro (Air Quality Assessment).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	<p>Policies supported [Respondent also commented on the Air Quality Assessment undertaken as part of the LPR under PS1404] Attachment: Air Quality Assessment review</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yeld, Piers
Consultee Full Name	Piers Yeld
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1632
Chapter / Policy / Appendix Number	Policy DM 8
Chapter / Policy / Appendix Title	Air Quality
Order	160
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:28:00
Attached Files	PS1632 table.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes	

<p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>10.12 Critical need to address inaction regarding WBC's core strategy, carbon reduction</p> <p>An urgent Air Quality improvement plan is a critical outage from the LPR 2037. Carbon reduction is a key issue for West Berkshire since it was introduced as a Core Strategy in 2016 to deliver carbon neutral development. Despite a reduction in CO2 emissions 2005, emissions are 3 times higher than national England and 4 times worse than rest of Berkshire and South East. Yet, there is no specific action plan to address the Climate Emergency facing us.</p> <p>[See attached Table]</p> <p>The LPR 2037 should have been the perfect opportunity to set out actions to remedy this. Without a specific plan to do this, West Berkshire's 15-year growth ambitions for housing, office and industry will simply worsen an already dangerous situation.</p> <p>Your own consultants highlight road traffic emissions as the primary cause. It is unacceptable WBC Highways bases its transport thinking with traffic surveys that are six-year-old! ATC road strip surveys which monitor volume, vehicle type and speed are low in cost and can be produced in a matter of weeks. This data collection and planning inaction is unacceptable. The continuing problem of unchecked and growing traffic pollution will impact on everyone and will derail West Berkshire's vision to make this a place people want to live in, work from and invest in.</p> <p>While cycling and walking are to be encouraged, since 90% of land area is rural, road vehicles are sadly the primary transport option for most rural communities of villages and small parishes given, a) the inadequate rural bus network which is underfunded and stretched, and b) outside Newbury, the rail network is small with timetables not attractive and conducive to greater use.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	

* Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy DM 9 Conservation Areas

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heritage Forum
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	Heritage Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS167
Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The general tenor of SP9 is welcomed. A proposal to update the HEAP has been submitted to the Heritage Service, and a response is awaited.</p> <p>The value of each Conservation Area lies in direct proportion to the extent that a Conservation Area Appraisal has been prepared and approved for it. Little or no progress in this regard has taken place. If it is to be rectified, considerably more attention and time will be need to be allocated by the Council, in collaboration with the Heritage Forum, than has been apparent to date.</p> <p>The support of the Council in extending local listing under the agreement with the Heritage Forum is welcomed. This would be assisted by pointing local parish councils towards the Forum when issues are raised regarding planning permission or proposed developments which may impact on heritage assets.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Theale Parish Council
<p>Consultee Full Name</p>	Theale Parish Council
<p>Consultee Organisation</p>	Theale Parish Council
<p>Agent Full Name</p>	Samantha Haywood
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS637

Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 42. DM9. The Plan needs to state how air quality will be improved if there is to be a large increase in development, traffic etc.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Society
Consultee Full Name	Mr David Peacock
Consultee Organisation	Newbury Society
Agent Full Name	
Agent Organisation	
Comment ID	PS773
Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 08:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Policy DM9 on Conservation Areas is misleading and flawed (see 10.81 p. 220).</p> <p>West Berkshire Council has been repeating general assurances about Conservation Area Appraisals for many years, with little sign of progress. In the 1990 (<i>sic</i>) Local Plan (policy B.ENV.6), WBC's predecessor Newbury District Council stated that "The District Council will encourage the preparation and implementation of schemes to preserve and enhance Conservation Areas." In this Local Plan WBC now says it is undertaking a "phased programme of Conservation Area Appraisals." What has actually happened for the 53 CAs across West Berkshire (mostly created in the 1970s and 1980s), is that 51 of them have never had Appraisals adopted.</p> <p>In 2010, two CAAs were adopted; and in the 13 years since then, no CAAs have been adopted, in spite of several documents being put forward from different parishes in the hope that these will encourage action from WBC. Of the six conservation areas in Newbury, created from 1971 onwards, none has ever received an Appraisal. In practice, despite its assurances, WBC is not following national policy on the creation of Appraisals, let alone on their regular review.</p> <p>Far from facilitating local involvement, as national policy indicates and the current draft Local Plan suggests, WBC has ignored or rejected approaches for nearly 20 years. Submissions from Newbury Town Council were made as long ago as 2006. Even in work on preparing the recent draft Appraisal for Newbury town centre, WBC deliberately excluded participation from Newbury Town Council and community groups such as The Newbury Society.</p> <p>The Conservation Area Working Group (named in this policy) has not met since March 2020. Its status is unclear (- Is it an informal group?), and it was not even notified by WBC about the Newbury town centre draft Appraisal, let alone consulted. In addition, any progress at all in WBC adopting CAAs was dependent upon the limited time of its conservation officer(s), yet over the past year this has been heavily cut, to effectively remove them from future involvement and to stall future efforts. A policy which consists of empty words, and can be demonstrated as such, cannot be considered sound, effective or consistent with national policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p>	Yes

* Yes	
* No	
Please give reasons for your answer	
4. Proposed Changes	In the light of 2. above, policy DM9 needs to be rewritten to put forward a clear and achievable policy for the preparation of some Conservation Area Appraisals for West Berkshire, referencing resources required. Heritage should be seen as one element of sustainability.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	No
* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1190
Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? -	Yes

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Para 10.81</p> <p>Our main concern regarding conservation areas in West Berkshire concerns the large number that do not have a CA Appraisal and, ideally, a Management Plan. To support further action on this, we suggest moving the text from paragraph 10.81 to the text supporting SP9 and adding relevant commitments to policy SP9.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1281
Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

<p>Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Most of the 53 CAs in the District were designated more than 30 years ago, yet the only two for which a CAA has been carried out and approved as Local Plan evidence are two of the most recently designated: Streatley & Peasemore. These are among the smallest and yet the CAAs were carried out immediately after they were first designated.</p> <p>This shows that the Council has not used any kind of systematic, evidence based or reasonable approach and has failed to carry out its statutory function cited in 10.80. Without a CAA it is very difficult for any LPA to “define what is special about a particular Conservation Area” and therefore to justify a claim that a particular development harms its character. This leads to a significant degree of uncertainty in the minds of all stakeholders in the planning process, adds to delays and costs and brings the process and the Plan itself into disrepute among the community.</p> <p>CAs are by definition the areas within settlements that far more people experience in their routine daily lives than other aspects of Heritage protection of which seems to have been given a much greater share of the Council’s resources over many decades.</p> <p>For these reasons, we believe the Plan is currently ineffective and not in accordance with national planning policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>Nothing that can be added to the Plan itself can make this aspect of it sound. Until evidence is produced that some of the larger CAs will have CAAs made within a period of, say, five years, there can be no confidence that Policy DM9 will carry sufficient weight in decision making for developments within or affecting the setting of a CA. For example, Newbury Town Centre was designated a CA in 1971 and contains more Listed Buildings than any other in the District, but 50 years on its CAA has only this year been published for consultation.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	To give examples of how lack of CAAs has impacted on development in central Newbury and details of what I know about how local policy and resourcing priorities have caused this.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)
Consultee Full Name	Lochailort Newbury Limited
Consultee Organisation	Lochailort Newbury Limited
Agent Full Name	Sarah Ballantyne-Way
Agent Organisation	Lochailort Investments Ltd
Comment ID	PS1402
Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Paragraph 10.82 is incorrect. The loss of a building that does not make a positive contribution to the CA cannot, by definition, be considered harmful to it.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>There should be a general cross reference to Policy SP9 to ensure that the public benefits approach in Conservation Areas is carried through.</p> <p>Bullet point g should be deleted. It sets out:</p> <p><i>g. to ensure it does not generate levels of traffic, parking or other environmental problems which would result in substantial harm to the character, appearance or significance of the area; and</i></p> <p>The use of the term substantial harm is confusing, as these factors would be unlikely to result in a level of harm of that nature.</p> <p>The section on demolition of positive contributors should have another bullet point added to be consistent with the general approach in the NPPF:</p> <p><i>iii. OR The proposed development generates planning benefits that outweigh the harm arising from its loss in accordance with paras 201 or 202 of the NPPF as appropriate</i></p> <p>Paragraph 10.82 is incorrect. The loss of a building that does not make a positive contribution to the CA cannot, by definition, be considered harmful to it.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council

Agent Full Name	
Agent Organisation	
Comment ID	PS1433
Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes

Please give reasons for your answer	Support
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1451
Chapter / Policy / Appendix Number	Policy DM 9
Chapter / Policy / Appendix Title	Conservation Areas
Order	161
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	Policies supported
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 10 Listed Buildings

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1452
Chapter / Policy / Appendix Number	Policy DM 10
Chapter / Policy / Appendix Title	Listed Buildings
Order	162
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1761
Chapter / Policy / Appendix Number	Policy DM 10
Chapter / Policy / Appendix Title	Listed Buildings
Order	162
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We support the proposed policies listed in this representation There is a minor typo in policy DM10 – an “is” is not needed Also, there is a minor formatting issue, with paragraph 10.100 being indented further than others.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	unless justified to the satisfaction of the Council, that the proposed changes, loss or irreversible damage, and/or addition of new features to the Listed Building and its setting are: <ul style="list-style-type: none"> • Less than substantial in terms of impact/harm on the character and significance of the Listed Building and its setting; and • Is off-set by the public benefit from making the changes, including enabling optimal viable use, and net enhancement to the Listed Building and its setting.
5. Independent Examination - If your representation is seeking a	No

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1435
Chapter / Policy / Appendix Number	Policy DM 10
Chapter / Policy / Appendix Title	Listed Buildings
Order	162
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1803
Chapter / Policy / Appendix Number	Policy DM 10
Chapter / Policy / Appendix Title	Listed Buildings
Order	162
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	Yes

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Reference to paragraph 10.92 We welcome reference to taking a "whole building approach" to retrofitting energy efficiency measures in historic buildings
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)
Consultee Full Name	Lochailort Newbury Limited
Consultee Organisation	Lochailort Newbury Limited
Agent Full Name	Sarah Ballantyne-Way
Agent Organisation	Lochailort Investments Ltd
Comment ID	PS1403
Chapter / Policy / Appendix Number	Policy DM 10
Chapter / Policy / Appendix Title	Listed Buildings
Order	162
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The following policy text conflicts with the approach set out in SP9 and the NPPF: <i>Development will not be permitted if it would:</i> <i>i. Adversely affect the character, scale, proportion, design, detailing, or materials used in the Listed Building; or</i> <i>ii. Result in the loss of/or irreversible change to original features or other features of importance or interest; or</i> <i>iii. Harm the setting of the Listed Building.</i></p> <p>This is because it does not allow for the application of paras 201 or 202 of the NPPF or the approach in SP9. It simply says 'will not be permitted'. This requires a binary assessment and does not allow a balanced judgement, as required by the NPPF and SP9.</p> <p>Similarly, the paragraphs that follow set out a series of tests under which the council will permit development:</p> <p><i>Unless justified to the satisfaction of the Council, that the proposed changes, loss or irreversible damage, and/or addition of new features to the Listed Building and its setting are:</i></p> <ul style="list-style-type: none"> • <i>Less than substantial in terms of impact/harm on the character and significance of the Listed Building and its setting; and</i> • <i>Is off-set by the public benefit from making the changes, including enabling optimal viable use, and net enhancement to the Listed Building and its setting. Clear justification for this harm should be set out in full in the Statement of Heritage Significance accompanying the proposals.</i>

	<p>This element of the policy conflicts with the NPPF, relevant NPPGs and all heritage guidance. The reference to public benefits is superfluous as SP9 and the NPPF already set this out, and here it introduces yet more tests. It is not necessary according to the NPPF or statutory provision to result in a net enhancement, and this too is a direct conflict with SP9 and the NPPF -if the impact needs to be net beneficial, then there would not be any harm, and this limb of the policy would not be engaged.</p> <p>If, on the other hand, what this part of the policy is trying to say is that harm to a LB (including by its setting) can be offset by net enhancements, then this is a confusing way of setting this out, and should be worded a clearer fashion.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The following wording (in bold) should be added to Policy DM10: <i>Development will not be permitted if applicants fail to provide adequate or accurate detailed information to show the effect on the significance and architectural and historic interest of the Listed Building and/or the contribution made by its setting and any curtilage listed features</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Policy DM 11 Non-designated Heritage Assets

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heritage Forum
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	Heritage Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS169
Chapter / Policy / Appendix Number	Policy DM 11
Chapter / Policy / Appendix Title	Non-designated Heritage Assets
Order	163
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The general tenor of SP9 is welcomed. A proposal to update the HEAP has been submitted to the Heritage Service, and a response is awaited.</p> <p>The value of each Conservation Area lies in direct proportion to the extent that a Conservation Area Appraisal has been prepared and approved for it. Little or no progress in this regard has taken place. If it is to be rectified, considerably more attention and time will be need to be allocated by the Council, in collaboration with the Heritage Forum, than has been apparent to date.</p> <p>The support of the Council in extending local listing under the agreement with the Heritage Forum is welcomed. This would be assisted by pointing local parish councils towards the Forum when issues are raised regarding planning permission or proposed developments which may impact on heritage assets.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
<p>Consultee Full Name</p>	James Hole
<p>Consultee Organisation</p>	Yattendon Estates Ltd
<p>Agent Full Name</p>	Ms Patricia Tercerio
<p>Agent Organisation</p>	Barton Willmore now Stantec
<p>Comment ID</p>	PS1155

Chapter / Policy / Appendix Number	Policy DM 11
Chapter / Policy / Appendix Title	Non-designated Heritage Assets
Order	163
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>We note that this Policy states that proposals affecting non-designated heritage assets will be determined in accordance with Policy SP9. As set out in our comments to Policy SP9, we consider that this policy does not meet the test of soundness because it is not consistent with national policy, insofar as it affords the same level of protection to both designated and non-designated heritage assets.</p> <p>The NPPF is clear in stating that the proposals affecting non-designated assets will be subject to a balanced judgement having regard to the scale of any harm or loss (paragraph 200):</p>

	<p><i>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</i></p> <p>We note that point c makes reference to a number of characteristics that developments should satisfy. However, we draw attention to para 200 of the NPPF, which does not state that regard should be paid to the setting of non-designated heritage assets when assessing proposals that may affect them.</p> <p>On the basis of the above discussions, we consider that Policy DM11 is not consistent with the NPPF, as it is more stringent than para 200 of the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>We therefore recommend that Policy DM11 is revised as detailed below (additions shown <u>underlined</u> deletions shown with a strikethrough).</p> <p>Proposals for development affecting buildings, monuments, sites, places, areas or landscapes identified as being non-designated heritage assets will be determined in accordance with Policy SP9. Proposals should satisfy all of the following criteria <u>where appropriate</u>:</p> <p>a. Demonstrate a clear understanding of the significance of the asset and/or its setting, alongside an assessment of the potential impact of the proposal on that significance;</p> <p>b. Be undertaken in a sympathetic manner using <u>appropriate</u> high-quality design; and</p> <p>c. Have particular regard to all of the following characteristics, depending on the type of asset affected:</p> <p>i. Its historic character and appearance;</p> <p>ii. Its scale, proportion, design, historic fabric, detailing and materials;</p> <p>iii. Ensuring there is no unacceptable level of loss, damage or covering of original features;</p> <p>iv. The layout, boundary features and setting of the asset, including key views into, through or out of it;</p> <p>v. Ensuring development is appropriate and sympathetic to its setting in terms of height, massing, density, materials and night and day visibility;</p> <p>vi. The conservation of both human-made and natural features of architectural, archaeological, artistic and historic interest within it and the requirement to record such features on the Historic Environment Record;</p> <p>vii. Its biodiversity interest;</p> <p>viii. Any disturbance which could harm its archaeological potential;</p> <p>ix. The integrity of the landscape;</p> <p>x. The cumulative impact of successive small scale changes; and</p> <p>xi. The enhancement of existing public access and interpretative opportunities.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Macro, Alan

Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1453
Chapter / Policy / Appendix Number	Policy DM 11
Chapter / Policy / Appendix Title	Non-designated Heritage Assets
Order	163
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	Yes

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Speen Parish Council
Consultee Full Name	David Dudman
Consultee Organisation	Speen Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1438
Chapter / Policy / Appendix Number	Policy DM 11
Chapter / Policy / Appendix Title	Non-designated Heritage Assets
Order	163
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:04:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	Yes
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	Yes
Please give reasons for your answer	Support
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1762
Chapter / Policy / Appendix Number	Policy DM 11
Chapter / Policy / Appendix Title	Non-designated Heritage Assets
Order	163
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	Yes

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	We support the proposed policy
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy DM 12 Registered Parks and Gardens

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heritage Forum
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	Heritage Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS159
Chapter / Policy / Appendix Number	Policy DM 12
Chapter / Policy / Appendix Title	Registered Parks and Gardens
Order	164
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The Berkshire Gardens Trust has a more active role than the draft LPR suggests. It has carried out a survey of historic public parks in Central and East Berkshire, and wishes to extend this to West Berkshire. The Heritage Forum, in consultation with the WBC Heritage Service, will pursue this.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Pick, Anthony</p>
<p>Consultee Full Name</p>	<p>Mr Anthony Pick</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS158</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 12</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Registered Parks and Gardens</p>
<p>Order</p>	<p>164</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	<p>E-Mail</p>

* Web * Unknown	
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Maintenance of the landscape will depend on the long term on the owners having both the income and the desire to do so. For major and public landscapes, this is straightforward. For small parcels of land attached to housing estates, diversified ownership is not likely to produce this result.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	A common policy for maintenance of all publically used landscape is needed.
5. Independent Examination - If your representation is seeking a change, do you consider it	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Holybrook Parish Council
Consultee Full Name	Pamela Kirkpatrick
Consultee Organisation	Holybrook Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS651
Chapter / Policy / Appendix Number	Policy DM 12
Chapter / Policy / Appendix Title	Registered Parks and Gardens
Order	164
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 11:30:05
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	The Linear Park is not on the 'Register of Historic Parks and Gardens of Special Historic Interest in England'. However, the Park has been Awarded Green Flag status for more than 11 consecutive years and it should, therefore, be listed by the Council as a protected local asset.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS920
Chapter / Policy / Appendix Number	Policy DM 12
Chapter / Policy / Appendix Title	Registered Parks and Gardens
Order	164
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy:	No

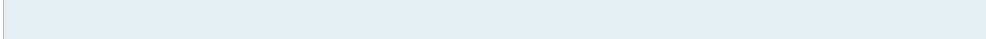
<p>the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>DM12 – Registered Parks & Gardens – relates only to Historic sites and I find the correlation of the DM Policies not obvious and would rather see them collected under headings such as those in the Case Study.</p> <p>And Non-Delivery of the promises in the old CS18 was never monitored via the AMR as it mainly concentrated on Housing delivery and not ALL Policy delivery.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Macro, Alan</p>
<p>Consultee Full Name</p>	<p>Councillor Alan Macro</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1454</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 12</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Registered Parks and Gardens</p>
<p>Order</p>	<p>164</p>
<p>Submission Type</p>	<p>E-Mail</p>

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1763
Chapter / Policy / Appendix Number	Policy DM 12
Chapter / Policy / Appendix Title	Registered Parks and Gardens
Order	164
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	We support the proposed policy
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	Yes

* **No**



Policy DM 13 Registered Battlefields

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Battlefields Trust
Consultee Full Name	Battlefields Trust Battlefields Trust
Consultee Organisation	Battlefields Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS4
Chapter / Policy / Appendix Number	Policy DM 13
Chapter / Policy / Appendix Title	Registered Battlefields
Order	165
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	26/01/2023 16:25:46
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	<p>Thank you for the opportunity to comment on this plan. The Battlefields Trust would like to commend West Berkshire Council for developing a specific policy related to the registered and unregistered battlefields at Newbury.</p> <p>In the last paragraph of the policy, we wondered whether it might be possible to strengthen this by adding after the word 'assessment': 'using best practice methodology for investigating battlefields supervised by an archaeologist with prior experience of battlefield archaeology'.</p> <p>The Battlefields Trust would also like to see the statement in the supporting text section of policy DM13 (Registered Battlefields) strengthened so that the Battlefields Trust will be consulted (as a non-statutory consultee) in the event planning applications are made on the Newbury battlefield(s). At the moment the supporting text indicated the planning authority will consider consulting the Battlefields Trust.</p> <p>In para 10.114 we assume the second battle of Newbury (1644) will be considered under the policy relating to undesignated heritage assets (DM11). At the moment the text says that this policy is DM12 (which relates to Parks and Gardens), so this needs correcting.</p> <p>We wonder whether it might be possible to define the area of the second Newbury battlefield somewhere to assist developers in knowing which areas are included. The Battlefields Trust attempted to have this battlefield included in a Local Listing in 2014/15, but this was rejected by West Berkshire Heritage Forum because '...to do so would entail discussions and negotiations with the many landowners involved, for which the Heritage Forum has not the administrative or legal resources or the public standing. It could perhaps be undertaken by Historic England for national listing or West Berkshire Council for local listing.' Historic England rejected registering the battlefield in July 2020 on the grounds that the topographic integrity of the battlefield was lacking, though it acknowledged that 'there are still disparate parts of the battlefield that are undeveloped'. On this basis a Local Listing initiated by West Berkshire Council appears to be the best way to delineate the boundaries of the battlefield. The Battlefields Trust would be happy to work with West Berkshire Council in developing such a listing.</p> <p>Finally, the Battlefields Trust remains concerned about the impact permitted development can have on registered battlefields and wondered if you might consider applying an Article 4 direction to the registered area of the first Newbury (1643) battlefield? The Battlefields Trust has been working with Hinckley and Bosworth Council on developing a proportionate Article 4 direction for the Bosworth (1485) battlefield along the lines of: 'all development within relevant permitted development classes that are within the registered area need to be reviewed for archaeological impact and mitigation put in place if that is deemed necessary; and for any permitted development above a certain height (say 5m) needs to be considered as a normal planning application as it may have an impact on the battlefield setting.'</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heritage Forum
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	Heritage Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS183
Chapter / Policy / Appendix Number	Policy DM 13
Chapter / Policy / Appendix Title	Registered Battlefields
Order	165
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>The 1644 Second Battle of Newbury was as historically significant as the 1643 First Battle, as it resulted directly in the formation of Cromwell's New Model Army, with which he was able to win the Civil War. The site of the Second Battle is therefore as deserving of being designated a Registered Battlefield as the site of the First Battle. Unfortunately, the more extensive development of the Second Battle site, which is currently unprotected, has prevented this happening.</p> <p>The Heritage Forum would be happy to work with the Council to at least locally list the site of the Second Battle, in collaboration with the Battlefields Trust, which will require legal support which only the Council has available.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Historic England
<p>Consultee Full Name</p>	Historic England
<p>Consultee Organisation</p>	Historic England
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1764

Chapter / Policy / Appendix Number	Policy DM 13
Chapter / Policy / Appendix Title	Registered Battlefields
Order	165
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We support the proposed policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	Yes

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1455
Chapter / Policy / Appendix Number	Policy DM 13
Chapter / Policy / Appendix Title	Registered Battlefields
Order	165
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Policies supported
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	

Policy DM 14 Assets of Archaeological Importance

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1456
Chapter / Policy / Appendix Number	Policy DM 14
Chapter / Policy / Appendix Title	Assets of Archaeological Importance
Order	166
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Historic England
Consultee Full Name	Historic England
Consultee Organisation	Historic England
Agent Full Name	
Agent Organisation	
Comment ID	PS1765
Chapter / Policy / Appendix Number	Policy DM 14
Chapter / Policy / Appendix Title	Assets of Archaeological Importance
Order	166
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:13:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We support the proposed policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 15

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS202
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	In regard to the requirements for the planting of new trees, woodland and hedgerows, we do not agree with point c which introduces a requirement to use native species wherever possible. We are of the view that species selection should be determined by the location, character and purpose of the proposed planting and in certain locations, different species may be considered more appropriate, as set out in points a, b, d and e. We therefore suggest that point c of the requirements for new planting is deleted.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We therefore suggest that point c of the requirements for new planting is deleted.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS714
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Sandleford Park West (SPW) The amendments to Policy DM15 – Trees, Woodland and Hedgerows are welcomed as they provide the flexibility for trees which are of a lower quality to be replaced, at an appropriate location and scale, to maximise the development potential of allocated and other sites.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS638
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that	

<p>unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 43. DM15. 10.138. There is already loss of tree canopy and this should be avoided at all costs.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Purley on Thames Parish Council
Consultee Full Name	Christopher Thompson
Consultee Organisation	Purley on Thames Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS513
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	After a revised period, consultation was advised
4. Proposed Changes	None - we would ask the planning authority to take into account the attached observations
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Woodland Trust
Consultee Full Name	Ms Bridget Fox
Consultee Organisation	The Woodland Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS850
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 00:23:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	<p>Yes - the policy recognises that ancient woodland and related habitats are irreplaceable, in line with the NPPF.</p> <p>This is strengthened by the robust guidance in the supporting text in paras 10.1.33-10.1.37.</p> <p>Para 10.1.33 recognises the unique quality of ancient woodland</p> <p>Para 10.1.34 sets out a precautionary approach to determining the buffers required for ancient woodland</p> <p>Para 10.1.35 draws on Woodland Trust expert guidance to advise on the makeup of buffer zones</p> <p>Para 10.1.36 requires a detailed Ancient Woodland Nitrogen Impact Assessment for ammonia-emitting facilities</p> <p>Para 10.1.37 specifies that historic ancient wood pastures and historic parkland should be treated as ancient woodland, in line with the NPPF.</p> <p>Together, these represent a best practice approach to meeting the legal requirements for ancient woodland protection that the Woodland Trust strongly welcomes and endorses.</p>
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Draft policy DM15 supports national policy on the protection of ancient woodland in the NPPF and the promotion of woodland cover as part of the Nature Recovery Network.

	<p>The Woodland Trust strongly welcomes the policy and the supporting text in paras 10.125 to 10.138 of the Local Plan review which combine to make the plan effective in support for national policy.</p> <p>We support the policy wording “use native species wherever appropriate” and the supporting text in para 10.126 “For new planting the use of UK and Ireland sourced and grown tree stock is encouraged.” This is important for tree health & biosecurity, in line with Government policy in the England Trees Action Plan and the GB Plant Biosecurity Strategy.</p> <p>As noted above, we support the policy to protect ancient woodland, strengthened by the robust guidance in the supporting text, paras 10.1.33-10.1.37.</p> <p>We support para 10.138 which commits to set an evidence-based tree canopy cover target for West Berkshire. This is an effective way to ensure that the Local Plan contributes to supporting national policy for Local Nature Recovery Strategies and the delivery of Biodiversity Net Gain.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	n/a
4. Proposed Changes	n/a
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	n/a
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS867
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS	E-Mail

* Web * Unknown	
Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>The AMR 2022 (January 2023) (paragraph 1.14) notes that 'house prices in West Berkshire are high and the provision of affordable housing to meet local needs, particularly for young people and key workers, is one of the Council's priorities.' Accordingly, it is important that measures are taken to address this need. The general approach of draft LPR Policies DM15 and DM16, to support First Homes and rural exception housing adjacent to settlement boundaries, is therefore supported. This approach will also help to meet rural housing needs and enhance the vitality of rural communities in the District, in line with NPPF paragraph 79, and therefore it is important that a positive approach is taken to considering such schemes.</p> <p>It is welcomed that draft LPR Policies DM15 and DM16 include some allowance for a proportion of enabling market housing on entry-level exception schemes where appropriate (in line with the Written Ministerial Statement on First Homes and NPPF paragraph 78) which will help to support appropriate schemes to come forward and benefit rural communities.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	Yes

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	BioCap (Ed Cooper)
Consultee Full Name	Ed Cooper
Consultee Organisation	BioCap
Agent Full Name	
Agent Organisation	
Comment ID	PS740
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 15:31:01
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The importance of Biodiversity Net Gain and habitat restoration and creation within the Government's Environmental Improvement Plan Apex Goal – Improving Nature – as well as the contribution captured and sequestered carbon can make to West Berkshire's Net Zero plans, means Biodiversity should be a specific item within the Development Management Policies in the Local Plan. Biodiversity is referenced, but often simply in passing, within other sections. Given our Government's high commitment to leaving the environment in a better state than we found it, and the Government's ambition to reverse the decline of nature, there needs to be specific policy in this section of the Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The importance of Biodiversity Net Gain and habitat restoration and creation within the Government's Environmental Improvement Plan Apex Goal – Improving Nature – as well as the contribution captured and sequestered carbon can make to West Berkshire's Net Zero plans, means Biodiversity should be a specific item within the Development Management Policies in the Local Plan. Biodiversity is referenced, but often simply in passing, within other sections. Given our Government's high commitment to leaving the environment in a better state than we found it, and the Government's ambition to reverse the decline of nature, there needs to be specific policy in this section of the Local Plan.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1744
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	No

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>5.6 Policy DM15 'Trees, Woodland & Hedgerows' – We continue to object to the wording of this policy as it is too restrictive in only allowing protected trees to be removed in "exceptional circumstances". It should be amended to allow for the removal of trees where it can be demonstrated that the removal of the trees is a) appropriate in the context of a wider development, b) trees proposed for removal are coming to the end of their life, and / or c) it can be demonstrated that appropriate, replacement trees can be provided as part of a wider landscaping scheme.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1370
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	No

delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	This policy states that "Development which conserves and enhances trees, woodland and hedgerows will be supported". It is not appropriate to conserve trees, woodlands and hedgerows in all instances, for example where they do not have significant amenity and landscape value and where replacement vegetation will result in enhancements to the area/ an improved design scheme. The policy should be amended accordingly for clarity.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1506
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS	Web

* Web * Unknown	
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework. The supporting text highlights that the protection of existing trees, woodland and hedgerows and the addition of new planting contributes greatly to conserving and enhancing the local character of an area. This policy notes that development which conserves and enhances trees, woodland and hedgerows will be supported; however this policy could go further and give weight to developments that provide enhancements to trees, woodland and hedgerows. This would better reflect the supporting text which highlights the importance of existing and additional planting.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	

4. Proposed Changes	Policy DM15 should be amended to include: 'Positive weight will be afforded to development that can demonstrate enhancements to and/or propose new trees, woodlands and hedgerows of appropriate species'
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1457
Chapter / Policy / Appendix Number	Policy DM 15
Chapter / Policy / Appendix Title	
Order	167
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	Yes

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Policies supported
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review

- * Yes
- * No

Yes

Policy DM 16 First Homes Exception Sites

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Abri Group LTD
Consultee Full Name	Meghan Rossiter
Consultee Organisation	Abri Group LTD
Agent Full Name	
Agent Organisation	
Comment ID	PS46
Chapter / Policy / Appendix Number	Policy DM 16
Chapter / Policy / Appendix Title	First Homes Exception Sites
Order	169
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	14/02/2023 13:23:01
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Point c of this draft policy (and text at paragraph 11.3) suggests that market homes should only be permitted where this will enable grant funding of First Homes, however grant funding is not available for the delivery of First Homes as this tenure is outside the Affordable Homes Programme. First Homes funding was available as part of the initial pilot scheme (First Homes Early Delivery Programme), but this has not been rolled out further.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Point C of the policy, together with the text in paragraph 11.3, should be updated to remove reference to grant funding, to be effective.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Theale Parish Council</p>
<p>Consultee Full Name</p>	<p>Theale Parish Council</p>
<p>Consultee Organisation</p>	<p>Theale Parish Council</p>
<p>Agent Full Name</p>	<p>Samantha Haywood</p>
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS639</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 16</p>
<p>Chapter / Policy / Appendix Title</p>	<p>First Homes Exception Sites</p>
<p>Order</p>	<p>169</p>
<p>Submission Type</p> <p>* E-Mail</p>	<p>E-Mail</p>

* Letter * Other * SMS * Web * Unknown	
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 44. DM16 e. The Plan needs to state that all affordable housing will remain affordable e.g. no extensions allowed on properties which can increase value and then make the properties non-affordable. 45. DM16. 11.1. 'Rent' needs to be reinstated as there are many people who cannot get a mortgage for a variety of reasons.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS868
Chapter / Policy / Appendix Number	Policy DM 16
Chapter / Policy / Appendix Title	First Homes Exception Sites
Order	169
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	Yes

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The AMR 2022 (January 2023) (paragraph 1.14) notes that 'house prices in West Berkshire are high and the provision of affordable housing to meet local needs, particularly for young people and key workers, is one of the Council's priorities.' Accordingly, it is important that measures are taken to address this need. The general approach of draft LPR Policies DM15 and DM16, to support First Homes and rural exception housing adjacent to settlement boundaries, is therefore supported. This approach will also help to meet rural housing needs and enhance the vitality of rural communities in the District, in line with NPPF paragraph 79, and therefore it is important that a positive approach is taken to considering such schemes.</p> <p>It is welcomed that draft LPR Policies DM15 and DM16 include some allowance for a proportion of enabling market housing on entry-level exception schemes where appropriate (in line with the Written Ministerial Statement on First Homes and NPPF paragraph 78) which will help to support appropriate schemes to come forward and benefit rural communities.</p> <p>Draft LPR Policy DM16 and the supporting text set out the requirement for rural exception schemes to meet local housing needs, identified through a local needs survey. Whilst acceptable in theory, there may be additional ways in which local housing need can be demonstrated and the policy would benefit from setting out additional guidance on what evidence should support planning applications. Our experience to date is that the lack of clarity and consistency, as well as onerous expectations relating to housing needs surveys, has been a disincentive to landowners to release otherwise appropriate sites for this type of development.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p>	Yes

* No	
5. Independent Examination	The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 17 Rural Exception Housing

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rivar Ltd (Represented by Pro Vision)
Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS1385
Chapter / Policy / Appendix Number	Policy DM 17
Chapter / Policy / Appendix Title	Rural Exception Housing
Order	170
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>West Berkshire Local Plan Review – Proposed Submission (January 2023)</p> <p>Pro Vision is instructed by Rivar Ltd. to submit representations in response to the West Berkshire Council ('the Council') Regulation 19 Consultation on the proposed submission version of the Local Plan Review (LPR) to 2039, herein after referred to as the 'the Plan'.</p> <p>This representation is not made in relation to any particular site, albeit related generally to our client's land interests at various locations within the district, and in the interests of contributing to a sound plan.</p> <p>Submissions on Policy DM17 - Rural Exception Housing</p> <p>The Policy sets out the requirements to deliver rural exception sites adjacent to rural settlements in accordance with paragraph 78 of the Framework'.</p> <p>Rivar, in principle, support the inclusion of Policy DM17. Indeed, the Housing Needs Assessment Update (dated, July 2022) prepared by Iceni (on behalf of the Council) demonstrates that within the North Wessex Downs AONB area (a large proportion of the rural area in West Berkshire) that there is a significant affordable housing need of 152 affordable and social rented homes per annum, and a further 160 shared ownership homes. This equates to 46% of the overall need for affordable and social rented homes and 43% of the shared ownership need in the district.</p> <p>However, we have concerns that the requirement for all schemes to provide a local housing needs survey is onerous and will severely restrict the delivery of sites through this policy, particularly as the Council do not incentivise the Parishes to have an up to date Housing Needs Survey. The lack of affordable housing provision will determine who can live in these rural villages contrary to the overarching aim of improving affordability as a key objective of the Plan. The Council should be seeking to maximise the provision of affordable housing (paragraph 4.74 of the Housing Needs Assessment Update) and, therefore, this strict requirement has the potential to restrict supply where it is needed.</p> <p>The Policy should allow for greater flexibility to help demonstrate a local need, including a range of evidence such as the Council's Housing Register, past delivery of affordable housing, affordability and any other available evidence base prepared by the Council and/or a Parish etc., as well as any Housing Needs Survey.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>For the Policy to be sound it is recommended that the following modifications are made:</p> <p>Policy DM17 <i>Rural Exception Housing</i></p> <p><i>Small scale rural exception housing schemes will be supported adjacent to rural settlements to meet a local housing need. Such schemes will be expected to be in response to a need identified through a local needs survey. It will need to be demonstrated that the scheme meets an identified local need for a parish or group of parishes.</i></p> <p>The affordable housing within the scheme will be required to remain affordable in perpetuity.</p> <p>...</p> <p><i>[The supporting text can then set out the range of evidence that the Council will accept to demonstrate an identified local need as discussed above]</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Manor Oak Homes Limited (Represented by Armstrong Rigg Planning)
Consultee Full Name	Manor Oak Homes Limited
Consultee Organisation	Manor Oak Homes Limited
Agent Full Name	Mr Geoff Armstrong
Agent Organisation	Armstrong Rigg Planning
Comment ID	PS1214
Chapter / Policy / Appendix Number	Policy DM 17
Chapter / Policy / Appendix Title	Rural Exception Housing
Order	170
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:39:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Our client's representations concern Policy DM17 – Rural Exceptions Housing. Our client is currently working with East Ilsley Parish Council to bring forward an exception site to meet local need in the village identified through a Housing Needs Survey (HNS). In addition to identifying a need for affordable dwellings, the East Ilsley HNS also identifies a significant need for smaller 2-3 bedroom market dwellings. In fact, the need for market housing for local people in the village is demonstrably greater than the need for affordable housing and many responses to the HNS expressed support for modest sized dwellings for private sale to meet a real shortage in the village.</p> <p>The shortage of smaller dwellings for private sale in East Ilsley is backed up by census data (2011 Census - Table LC4405EW) which shows that 51% of all owned dwellings (i.e. excluding affordable and private rental) in the village have 4 or more bedrooms. This compares to a figure for West Berkshire as a whole of 37% dwellings with 4 or more bedrooms. The shortage of smaller dwellings for private sale has a significant impact locally on the demographic balance of the village and the ability for people who grew up in the village to remain living there in adulthood. The Council's Housing Background Paper (January 2023) identifies a need for 85-90% of all new market dwellings to have fewer than 4 bedrooms and yet the Local Plan Review includes no way for market dwellings to be delivered in villages like East Ilsley to meet the clear need for a more balanced housing stock.</p> <p>The only way for market housing to currently be delivered is as small scale development within the settlement boundary (which is far more likely to deliver larger dwellings that are not needed) or on rural exception sites, but only if it is required to make the scheme viable. There is no policy allowance in the local plan for the delivery of homes for private sale to meet an identified local need.</p> <p>At paragraph 62, the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This would include people living in an area who wish to stay in the area but who do not qualify for affordable housing and are unable to meet their housing needs due to a shortage of suitable homes for private sale. In the context of East Ilsley, the Local Plan Review currently fails to meet an identified need for smaller market dwellings for local people and it is therefore not consistent with national policy and cannot be considered sound.</p> <p>In order to make the Local Plan Review sound, we consider that Policy DM17 should be amended to allow for the delivery of market housing to meet a specific local need identified through a Housing Needs Survey. We are not advocating for a relaxation of normal development controls to allow any form of market housing outside of settlement boundaries, but rather for the delivery of dwellings for private sale when there is specific evidence of a local need, where the dwellings are secured for local people and where schemes would also meet the identified need for affordable housing.</p> <p>We have experience of similar policies elsewhere in the country that allow for the delivery of market housing as part of the mix on exception sites (without a requirement to demonstrate viability requirements) and consider that the following proposed changes would ensure that Policy DM17 can be considered sound.</p> <p>Policy DM17 Rural Exception Housing <i>Small scale rural exception housing schemes will be supported adjacent to rural settlements to meet a local housing need. Such schemes will be expected to be in response to a need identified through a</i></p>

local needs survey for a parish or group of parishes. The affordable housing within the scheme will be required to remain affordable in perpetuity.

It is expected that rural exception housing schemes will **focus on the delivery of** deliver 100% affordable housing. In some cases, a proportion of market housing may be acceptable where this **either** enables the closing of a funding gap for the delivery of the affordable housing within the scheme **or it would meet a specific identified need for market housing**. The market homes should be integrated with the affordable homes to form a single scheme.

Where market housing is being used to financially support a rural exception housing scheme, the following detailed evidence is required:

a. A financial appraisal demonstrating the viability of the scheme and the financial relationship between open market and affordable housing;

b. The measures being taken to ensure the use of the affordable housing is to meet local needs in perpetuity; and

c. The relationship of open market housing to meeting local need, in terms of location, design, visual character, and type of accommodation.

Where market housing is proposed to meet an identified unmet need on a rural exception housing scheme, the following detailed evidence is required:

d. The need for new homes for private sale must be identified through a local needs survey;

e. The dwellings must be secured for local people living or working in the parish or people with close relatives in the parish. This will be achieved by requiring each dwelling to be marketed to people with a local connection only for a period of 6 months at a maximum price set by taking the average of two independent valuations; and

f. The proposed development must demonstrate that any need for affordable housing identified in the local needs survey is also met.

We trust these representations will be given due consideration in the examination of the Local Plan Review and we look forward to participating further in due course. In the meantime, if you have any questions please don't hesitate to contact me.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Yes

Please give reasons for your answer

4. Proposed Changes

In order to make the Local Plan Review sound, we consider that **Policy DM17** should be amended to allow for the delivery of market housing to meet a specific local need identified through a Housing Needs Survey. We are not advocating for a relaxation of normal development controls to allow any form of market housing outside of settlement boundaries, but rather for the delivery of dwellings for private sale when there is specific evidence of a local need, where the dwellings are secured for local people and where schemes would also meet the identified need for affordable housing.

We have experience of similar policies elsewhere in the country that allow for the delivery of market housing as part of the mix on exception sites (without a requirement to demonstrate viability requirements) and consider that the following proposed changes would ensure that Policy DM17 can be considered sound.

Policy DM17
Rural Exception Housing

Small scale rural exception housing schemes will be supported adjacent to rural settlements to meet a local housing need. Such schemes will be expected to be in response to a need identified through a local needs survey for a parish or group of parishes. The affordable housing within the scheme will be required to remain affordable in perpetuity.

*It is expected that rural exception housing schemes will **focus on the delivery of** deliver 100% affordable housing. In some cases, a proportion of market housing may be acceptable where this **either** enables the closing of a funding gap for the delivery of the affordable housing within the scheme **or it would meet a specific identified need for market housing**. The market homes should be integrated with the affordable homes to form a single scheme.*

Where market housing is being used to financially support a rural exception housing scheme, the following detailed evidence is required:

a. A financial appraisal demonstrating the viability of the scheme and the financial relationship between open market and affordable housing;

b. The measures being taken to ensure the use of the affordable housing is to meet local needs in perpetuity; and

c. The relationship of open market housing to meeting local need, in terms of location, design, visual character, and type of accommodation.

	<p><u>Where market housing is proposed to meet an identified unmet need on a rural exception housing scheme, the following detailed evidence is required:</u></p> <p><u>d. The need for new homes for private sale must be identified through a local needs survey;</u></p> <p><u>e. The dwellings must be secured for local people living or working in the parish or people with close relatives in the parish. This will be achieved by requiring each dwelling to be marketed to people with a local connection only for a period of 6 months at a maximum price set by taking the average of two independent valuations; and</u></p> <p><u>f. The proposed development must demonstrate that any need for affordable housing identified in the local needs survey is also met.</u></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
5. Independent Examination	To participate in the debate on this topic.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy DM 18 Self and Custom-build Housing

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pincents Lane (Represented by TOWN)
Consultee Full Name	Pincents Lane
Consultee Organisation	Pincents Lane
Agent Full Name	Mike Bodkin
Agent Organisation	TOWN
Comment ID	PS1363
Chapter / Policy / Appendix Number	Policy DM 18
Chapter / Policy / Appendix Title	Self and Custom-build Housing
Order	171
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:54:00
Attached Files	TOWN (Pincents Lane) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The 2021/22 WBC AMR includes the following information in relation to demand and delivery of self- and custom-build housing (Tables 3.23 and 3.24 respectively).</p> <p>Table 1: Demand and delivery of self- and custom-build plots in WBC. <see page 18 in attachment></p> <p>It is quite clear from the figures in Table 2 above that demand for self- and custom-build plots far outstrips demand. Strategic sites should make an identified contribution to meet these needs.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Strategic sites should make an identified contribution to meet these needs.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Hathor Property Limited (Represented by Bell Cornwell LLP))
<p>Consultee Full Name</p>	Fred Schiff
<p>Consultee Organisation</p>	Hathor Property Limited
<p>Agent Full Name</p>	Brigid Taylor
<p>Agent Organisation</p>	Bell Cornwell LLP
<p>Comment ID</p>	PS1249
<p>Chapter / Policy / Appendix Number</p>	Policy DM 18
<p>Chapter / Policy / Appendix Title</p>	Self and Custom-build Housing
<p>Order</p>	171
<p>Submission Type</p> <p>* E-Mail</p>	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 09:26:00
Attached Files	PS1249 Bell Cornwell obo Hathor Property attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>DM18 (Self and Custom Build Housing) is supported, as it is evidence of the Council's recognition of its statutory duty to consider demand for custom and self build housing in plan making. The LPR is required to be informed by housing need assessment which includes the needs of different groups, including those wishing to commission or build their own homes. Based on the latest Governmental data release (May 2022), West Berks Council granted planning permission for 29 serviced plots between 31 Oct 2020 and 30 Oct 2021. Data was not supplied to indicate the level of demand based on the number of people on your registers. This data should be transparent and published regularly. By way of comparison, in neighbouring Basingstoke and Deane there are 328 entries on the register. If demand is similar in West Berks, then delivery is falling woefully short. Therefore, policy which supports delivery of self and custom build is supported.</p> <p>We note however, that this should not rely on delivery as part of large strategic development locations due to the time delays in such plots coming forward. Rather, policy should support delivery of self and custom build on small plots in a limited number settlements. Brimpton is one such location where a small</p>

	number of sites could be delivered, to meet local demand for custom and self-build in close proximity to facilities such as the local primary school.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Include site allocations for small scale self and custom build plots, rather than relying upon large strategic development sites to deliver these. Sites are available immediately, including our client's site in Brimpton, and could deliver small scale development to meet this identified need, in a way which is appropriate to the pattern and form of the settlement. <for map see attachment>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1527
Chapter / Policy / Appendix Number	Policy DM 18
Chapter / Policy / Appendix Title	Self and Custom-build Housing
Order	171
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>[For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes]</p> <p>Self-Build</p> <p>Footnote 28 of the NPPF explains that under the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom housebuilding. They are also subject to duties to have regard to this and to give enough suitable development permissions to meet the identified demand.</p> <p>The 2022 Authority Monitoring Report (January 2023) contains data on the number of individuals and associations on the self-build register in West Berkshire. We understand that as at October 2022, the number of entries logged on the register since May 2016 comprised 541 individuals and 2 groups. By comparison, a total of 128 self-builds were granted planning permission over the same period (May 2016 to October 2022).</p> <p>Therefore, Croudace is encouraged to see that Policy SP18 (Housing Type and Mix) outlines support for the principle of self and custom-build housing, but considers that in order to be sound, the LPR should either allocate or ensure that development is obliged to deliver an element of self and custom-build housing to ensure needs are met.</p> <p>Self and Custom-Build</p> <p>Whilst Croudace is encouraged to see that Policy SP18 (Housing Type and Mix) outlines support for the principle of self and custom-build housing, only two proposed allocations within the plan (SP17 – North East Thatcham Strategic Site Allocation which requires 3% to be delivered via serviced custom/self-build</p>

	<p>plots; and RSA7 – 72 Purley Rise, Purley on Thames which more vaguely requires ‘an element’ of self or custom-build homes).</p> <p>To increase the variety in the supply of land for residential development, Croudace considers that the Council actively seeks to meet the needs for self and custom-build housing by outlining locations where this type of accommodation would be supported and allocating sites to deliver it. Without doing so, the LPR does not meet the tests of soundness and Croudace cannot support it.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1507
Chapter / Policy / Appendix Number	Policy DM 18
Chapter / Policy / Appendix Title	Self and Custom-build Housing
Order	171
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	Web
Response Date	03/03/2023 12:09:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework.</p> <p>Policy DM18 requires applications for self and custom-build housing to be high quality design and be sensitive to the characteristics of the local area. This policy misses an opportunity to deliver enhancements to local character, landscape and biodiversity as well as sustainable design and construction.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Policy DM18 should be amended to include:</p> <p>'Positive weight will be afforded to self-build developments that exceed sustainability standards, that provide enhancements to the landscape, enhance local character and provide biodiversity enhancements beyond the requirements of BNG.'</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	No

<p>necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy DM 19 Specialised Housing

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS640
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 46. DM19. 11.20. We request that this section is reinstated as you state a need so it conflicts.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>McCarthy and Stone (Represented by The Planning Bureau)</p>
<p>Consultee Full Name</p>	<p>Natasha Styles</p>
<p>Consultee Organisation</p>	<p>The Planning Bureau on behalf of McCarthy Stone</p>
<p>Agent Full Name</p>	<p>Natasha Styles</p>
<p>Agent Organisation</p>	<p>The Planning Bureau on behalf of McCarthy Stone</p>
<p>Comment ID</p>	<p>PS566</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 19</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Specialised Housing</p>
<p>Order</p>	<p>172</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	<p>Web</p>

* Unknown	
Response Date	03/03/2023 09:27:18
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Thank you for the opportunity to comment on the West Berkshire Council Local Plan Review 2022-2039 Proposed Submission Reg 19 draft – January 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.</p> <p>Policy DM19 seeks to support schemes that are providing for new specialised forms of housing. However, given the substantial need for specialist housing for older people within the District as identified in our response to SP12 and detailed in supporting text to the policy at para 11.18 ((1,710 units (95 per annum) over the plan period), the policy should be amended to emphasise the importance of older people's housing. It is additionally clear that the policy is mainly aimed at supporting the delivery of housing to meet the needs of older people and those with disabilities and therefore emphasising older people's need would make the policy clearer.</p> <p>Older person's housing also produces a large number of significant economic, social and environmental benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.</p> <p><u>Economic</u></p>

A report 'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year (Homes for Later Living September 2019). More detail on these financial savings is set out within the report.

A further report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "*Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)*" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

Given the need for specialist housing for older people already identified within the plan at para 11.18 and benefits such schemes bring, the policy should be amended to make it clearer that it specifically supports the delivery of specialist housing for older people. In addition, developers should not be required to demonstrate older person's housing need given the substantial need identified in the District and this point should therefore be deleted from the plan to ensure it is justified and effect.

Recommendation

In order for the Local Plan to be effective, justified and consistent with national policy the following amendments should be made to policy DM19:

The provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs **including schemes delivering specialist housing for older and disabled people** will be supported where:

- 1 **Housing meets a proven locally identified need in the District for the specific housing product being proposed; and**
- 2 The location is appropriate, in terms of design, layout, and accessibility of facilities, services and public transport

Specialist **accommodation housing meeting the needs of older people development** will be sought as an integral part of the mix from the strategic housing allocations at Sandleford Park and North East Thatcham.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Recommendation</p> <p>In order for the Local Plan to be effective, justified and consistent with national policy the following amendments should be made to policy DM19:</p> <p>The provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs including schemes delivering specialist housing for older and disabled people will be supported where:</p> <ol style="list-style-type: none"> Housing meets a proven locally identified need in the District for the specific housing product being proposed; and The location is appropriate, in terms of design, layout, and accessibility of facilities, services and public transport <p>Specialist accommodation housing meeting the needs of older people development will be sought as an integral part of the mix from the strategic housing allocations at Sandleford Park and North East Thatcham.</p>
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Churchill Retirement Living Ltd (Represented by Planning Issues Ltd)
<p>Consultee Full Name</p>	Churchill Retirement Living Ltd
<p>Consultee Organisation</p>	Churchill Retirement Living Ltd
<p>Agent Full Name</p>	Ziyad Thomas
<p>Agent Organisation</p>	Planning Issues Ltd
<p>Comment ID</p>	PS956
<p>Chapter / Policy / Appendix Number</p>	Policy DM 19
<p>Chapter / Policy / Appendix Title</p>	Specialised Housing
<p>Order</p>	172
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p> <p>* Unknown</p>	E-Mail

Response Date	03/03/2023 16:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Churchill Retirement Living is an independent, privately owned housebuilder specialising in sheltered housing for older people. Paragraph 1 of the PPG Housing for Older and Disabled people states: <i>"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".</i> Paragraph: 001 Reference ID: 63-001-20190626 The West Berkshire Updated Housing Needs Assessment (2022) (HNA) advises that 'In total population terms, the projections show an increase in the population aged 65 and over of 73,500 people. This is against a backdrop of an overall increase of 70,900 - population growth of people aged 65 and over therefore accounts for over 700% of the total projected population change' (Paragraph 5.6 HNA). Both the HNA and the supporting text to Policy DM19 advises that the need for specialist housing for older people in the district is estimated to be around 1,710 units over the 2021-39 period (95 per annum), Table 5.8 of the HNA concludes that there is substantial oversupply of 'affordable' housing with support and that all future demand is for open market tenure.

	<p>The delivery of a suitable level of specialist older persons' housing will be a substantial undertaking over the Local Plan period and unless action is urgently taken the Council will struggle to address this need. The inclusion of a dedicated policy which is supportive of the need to deliver specialist older persons' housing at suitable locations in West Berkshire is commendable and supported accordingly</p> <p>Sub-clause A) of the policy refers to developers to provide up-to-date evidence of local need. However, the need for these forms of accommodation is self-evident and detailed at length in the HNA and the justification to the policy itself.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Muller Property Group (Represented by Walsingham Planning)
Consultee Full Name	Muller Property Group
Consultee Organisation	
Agent Full Name	Tom Edmunds
Agent Organisation	Walsingham Planning
Comment ID	PS846
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 09:55:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Muller Property Group control a site at Kennet Reach, Ham Mill Lane, Newbury on which they are progressing proposals for a new care home. A planning application was refused by West Berkshire District Council last year, and a new application is being prepared which responds to the Council's reasons for refusal.</p> <p>The representations are made in the context of a new care home on this site within the Newbury built up area.</p> <p>The focus of this response is therefore draft Policy DM19 Specialist Housing. The proposed wording states:</p> <p><i>The provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs will be supported where:</i></p> <p><i>Housing meets a proven locally identified need in the District for the specific housing product being proposed; and</i></p> <p><i>The location is appropriate, in terms of design, layout, and accessibility of facilities, services and public transport.</i></p> <p>We welcome the built-in support for specialist forms of housing including care homes and that "support" is the starting planning policy position.</p> <p>However the Policy comes with caveats which in our view are unnecessarily restrictive.</p> <p>It is important that the Policy reflects how the number of units needed in the District should be seen as a minimum and not a cap, the stated need of 1,710 units (95 per annum) over the Plan period is the absolute minimum number of units required to meet identified need. Anything above this should be</p>

	<p>welcomed. Policies which are grounded in need figures (for example) can only ever be reactive and slow, rather than agile and able to respond to changing circumstances.</p> <p>Furthermore, the need figure is a blunt instrument and doesn't account for the different types of accommodation in terms of offer, the level of care provision, the quality of the units themselves, and other factors such as their location.</p> <p>There will be situations where the quality of a modern new purpose-built care home is preferable to older stock. The true need will be higher than the stated figures, it doesn't account for people wishing to move or upgrade their accommodation. It doesn't break down the different types of need, for example the "need" or "demand" for modern high quality purpose built care home accommodation will be different to the figure stated in the supporting text.</p> <p>There will be situations where a care home within the built up area of Newbury and in a sustainable location is preferable to existing outdated stock in a less sustainable location.</p> <p>It is not clear why the Council wish to restrict speculative development of specialist types of accommodation, but the Policy as currently worded appears to unnecessarily restrict development of (for example) an upgraded offer in a better location.</p> <p>We would therefore recommend that flexibility is built into the Policy and allowance made for speculative or "windfall" development.</p> <p>New policy should build in flexibility which allows for market shifts or individual preferences. It should have sufficient scope to allow the decision taker to have regard to the potential of sites on an individual basis, both now and in the future over the course of the Plan period, rather than the acceptability of a proposal be tied to need.</p> <p>Policy DM19 as currently presented could fail to realise the potential of individual sites and creates unnecessary barriers to development. There are many different types of demand or need.</p> <p>It is in our view too prescriptive to restrict from the outset specialist housing only where a need can be demonstrated. "Need" will change over time, it will be subject to short-term and longer term trends and Policy DM19 as currently worded will be unable to respond to changing needs and market conditions. It is an inflexible Policy.</p> <p>The way Policy DM19 is currently worded is unsound, it has not been positively prepared. It would not be effective in meeting the needs of the District's residents for the reasons set out above. Finally, it is not clear why this approach has been taken, the restrictive and inflexible wording is not justified.</p> <p>Policy DM19 therefore needs modification.</p> <p>We note no changes to the Newbury built up area boundary is proposed in this location, which we agree with.</p> <p>Summary</p> <p>It is essential that Policies are flexible as the economy seeks to navigate and then recover from the challenges presented by the current economic downturn and the aftermath of the COVID-19 crisis.</p> <p>The planning system should be a tool to unlock the potential of sites rather than restrict or hamper them.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rivar Ltd (Represented by Pro Vision)
Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS1386
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:46:00
Attached Files	PS1386 Pro Vision (Rivar) - attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>West Berkshire Local Plan Review – Proposed Submission (January 2023)</p> <p>Pro Vision is instructed by Rivar Ltd. to submit representations in response to the West Berkshire Council ('the Council') Regulation 19 Consultation on the proposed submission version of the Local Plan Review (LPR) to 2039, herein after referred to as the 'the Plan'.</p> <p>This representation is not made in relation to any particular site, albeit related generally to our client's land interests at various locations within the district, and in the interests of contributing to a sound plan.</p> <p>Submissions on Policy DM19 - Specialised Housing</p> <p>The Housing Needs Assessment Update (dated, July 2022) prepared by Icení (on behalf of the Council) demonstrates a projected growth in those aged 65 and over of 13,500 persons over the plan period, representing 42% growth in West Berkshire. This forms part of the national picture which is described as "critical" in national policy guidance (Planning Policy Guidance Paragraph 001 Reference ID: 63-001-20190626).</p> <p>Evidence locally and nationally, therefore, demonstrates that there is a significant need for housing for older persons (i.e. specialist housing units and care/nursing beds) in the district during the plan period. In which case, Policy DM19 is not sufficiently positive to ensure that this problem is addressed. We have concerns that the policy requires evidence that each individual scheme meets a local need for that specific housing product to be supported by the Council. The Council's approach is clearly flawed as the evidence base already demonstrates that there is a significant need for specialist housing for older persons in the district during the plan period. The Policy therefore adds another onerous and unnecessary step to the process that may impede delivery of schemes for older persons accommodation.</p> <p>With the above in mind, it is considered that the Council needs to remove the requirement for evidence of a local need. The Policy should positively encourage development for specialist accommodation for older persons in areas with good access to public transport and local facilities and services. This was the approach supported by the Inspector into the South Oxfordshire Local Plan and Policy H13 – see paragraphs 241-242 of the Inspector's report enclosed with this letter (<i>see PS1386 Pro Vision (Rivar) - attachment</i>).</p> <p>The Policy explains that development will be supported where the location is appropriate in terms of design, layout and accessibility of services and public transport. However, Policy SP1 of the LPR generally provides a presumption in favour of development within the settlement boundaries (and seeks to restrict development beyond).</p> <p>The Council has not provided any evidence that this approach will deliver the significant need for housing for older persons during the plan period. The implications of this are important. On the face of it, it seems unlikely that the significant need can be met solely within settlement boundaries or via the limited site allocations. The remedy</p>

	is to provide clarification in the Policy that schemes that meet the above criteria will be supported both within and outside settlement boundaries. A positively worded policy which encourages delivery in sustainable locations will help bring forward specialised housing for older persons across the district.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	For the Policy to be sound it is recommended that the following changes are made: <i>Policy DM19 Specialised Housing The provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs will be supported where: a. Housing meets a proven locally identified need in the District for the specific housing product being proposed; and b. The location within or outside of a settlement boundary is appropriate, in terms of design, layout, and accessibility of facilities, services and public transport. ...</i>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1528
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Representations on behalf of Croudace Homes.pdf Croudace Homes Combined Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	[See attached Combined Appendices for appendices. For wider representation and Tables and Figures, see attached Representations on behalf of Croudace Homes] Specialist Housing for Older People Other than one line within draft Policy DM19 (Specialised Housing), which requires specialist accommodation to form "an integral part of the mix from the strategic housing allocations at Sandleford Park and North East Thatcham", there is no direction or clarity provided regarding the location, quantum or types of housing this sector needs over the plan period. Given the scale of the increase in older people in West Berkshire over the plan period, the LPR cannot be said to be 'positively prepared' on this basis, which is a clear failing.

	<p>Therefore, in order to ensure that the plan is 'positively prepared', Croudace urges the Council to explicitly and more seriously address the requirement in relation to specialist housing, especially for older people, by ensuring that planning policies contain a clear recognition of how needs for specialist housing will be delivered.</p> <p>Allocations for Specialist Housing</p> <p>The NPPF at paragraph 62 outlines the importance of considering the size, type and tenure of housing needed for different groups in the community and that these needs should be assessed and reflected in planning policies. Such groups may include older people or those with disabilities.</p> <p>Such accommodation could include care homes or sheltered, supported or extra care housing for people who may not be in a position to live independently in more traditional forms of housing. In addition, the provision of specialist accommodation for these groups has the potential to free up existing housing stock (e.g. larger family accommodation) to meet more general housing needs.</p> <p>Whilst draft Policy DM19 (Specialised Housing) generally supports the provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs, no specific allocations are proposed to meet these needs in West Berkshire. Instead there is an expectation that the two strategic housing allocations at Sandford Park and North East Thatcham will provide specialist accommodation as an integral part of their mix. In Croudace's view, this is grossly insufficient to meet the scale of needs set out within the evidence base.</p> <p>Croudace provides the Council with two alternative ways in which this could and should be addressed.</p> <p>Firstly, the most logical approach would be to allocate specific sites, or parts of sites (alongside more general market and affordable housing), to meet specialist housing. In this vein, Croudace wishes it to be known that Henwick Park offers the obvious potential to provide specialist housing in a sustainable location with good access to local services and space for appropriate on-site amenity. As explained at Section 2 of these representations, any proposal to bring forward residential development at Henwick Park could feasibly include specialist accommodation to meet the needs of certain groups.</p> <p>Alternatively, another approach would be to introduce a specific mechanism in planning policy which supports the provision of specialist housing outside of settlement boundaries, subject to certain criteria. For example, the South Northamptonshire Council model in Policies LH6 and LH7 of its Part 2 Local Plan (Appendix J). These policies provide support for proposals bringing forward housing for older persons, specialist housing, residential care and nursing care on land directly adjoining settlement 'confines' (i.e. boundaries) where certain criteria relating to sustainability, design, highways and parking and amenity space is met, and where there is evidenced need for the facility and no preferential sites within settlement confines are available.</p> <p>By taking the latter approach, the Council could help to deliver land for specialist housing without needing to specifically allocate it for development. In essence, the market for that type of housing would determine appropriate locations for growth and it would not be reliant on spatial allocations for delivery.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Ensuring the needs for all types of housing are accounted for – the LPR at present does not specifically allocate land for specialised housing and only allocates land for a small number of self and custom build homes in one area. Croudace encourages the Council to re-think this strategy to ensure that the needs of all members of the community are accounted for, particularly in light of the needs outlined within the LPR's evidence base. As it stands, the LPR is not 'consistent with national policy' or 'positively prepared', in this regard.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1326
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Object. The wording is not justified or effective. As currently worded this element of the policy is a little vague. The proposed amendment directs the decision maker and developer towards information required to appraisal the requirement for the provision of specialist accommodation.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	"Specialist accommodation development will be sought as an integral part of the mix from the strategic housing allocations at Sandleford Park and North East Thatcham <u>subject to evidence of need and site specific viability.</u> "
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1371
Chapter / Policy / Appendix Number	Policy DM 19

Chapter / Policy / Appendix Title	Specialised Housing
Order	172
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	This policy refers to meeting a proven locally identified need for that housing product. It is inappropriate to have to prove locally identified need to support delivery of individual schemes given the evidence base and already identified need for specialist Housing.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1692
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	No

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>The Council recognise that an increasing elderly population will require the delivery more specialist accommodation in future. As such, the priority should be for the Council to allocate sites promoted for such accommodation in the local plan. Only through site allocations can the Council be certain that the needs of older people be met.</p> <p>However, the HBF recognise that it may not be possible to allocate sufficient sites for specialist accommodation to meet the needs of older people. As such it is important that the policy provides an effective mechanism through which decisions on accommodation can be made on the basis of the need for and supply of such development. It is therefore important that this policy sets out how many specialist homes for older people are required in West Berkshire and a commitment is made to monitoring supply against this level of need across the plan period. In addition, the HBF would also recommend that a presumption in favour of development be applied if the supply of land for such development falls below identified annual needs of 95 units per annum.</p> <p>Whilst there is no direct requirement to do so in national policy the HBF would argue that in order for the policy to be effective it needs to be clear as to what is required and how a decision maker should react to ensure those needs are met. By including the level of need in the policy rather than the supporting text greater weight will be given to this in decision making leading to more positive approach that is required to meet housing the needs of older people.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	To represent the views of our members

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1458
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	Yes

account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Tim North & Associates Limited
Consultee Full Name	Tim North
Consultee Organisation	Tim North & Associates Limited

Agent Full Name	Tim North
Agent Organisation	
Comment ID	PS1518
Chapter / Policy / Appendix Number	Policy DM 19
Chapter / Policy / Appendix Title	Specialised Housing
Order	172
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 19:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

Please give reasons for your answer

The Local Plan Review (LPR) strategy where it relates to specialist older persons accommodation has not been positively prepared, is neither justified nor effective, nor is it consistent with national policy. Policies SP18, DM1, DM4, and in particular Policy DM19 of the LPR when read as a whole have not fully taken into account the fact that the population of older people in England is growing rapidly, with the consequence that ensuring future housing supply is met on the basis of "Lifetime Homes Standards" will not of itself be either suitable or capable in meeting the accommodation requirements of various types of specialist older households.

The need to consider specialist older persons accommodation in adjoining authorities to assess the extent to which they can meet their own requirements; considerations relating to changes in the type of care home accommodation; attrition levels seen in terms of the reasons behind the closure of care homes; viability issues which can result in substantially different characteristics relative to general housing, and lessons to be learnt from the recent Covid-19 pandemic, with consequences for the design and access to communal open space of specialist older persons accommodation; all play an important role in the need for, and hence the likely future provision of this form of housing. It is contended that these material considerations effecting specialist older persons accommodation have not been fully met in the policies in the LPR, being considered in greater detail later in these representations.

The ONS 2019 Mid-year population estimates indicate that over the past 20 years (1998-2018) the number of residents aged 65 and over in England increased by approximately 31%; more than double the rate of growth than the total population over the same time period (15%).

This ageing trend is expected to accelerate in that the 2018 base i.e. the ONS 2019 National Population Projections, reveal that the older population in England could increase by some 41% over the 20 year period between 2018 and 2038, meaning that by 2034, almost 1 in 4 (24%) of the population in England are expected to be aged 65 or over. The rate of growth in West Berkshire over the period 2022 to 2039 for residents aged 75 or over, is projected to increase by 64%.

Current national policy as set out at paragraph 62 of the NPPF 2021 requires local planning authorities to consider inter alia:-

"... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities ..." (my emphasis)

The NPPG at paragraph 001 Reference ID: 63-001-20190626 states

"The need to provide housing for older people is critical." (underlining as per the NPPG; my emphasis)

Government guidance concerning older persons specialist housing refers to there being a "critical need", a term absent when describing all other forms of housing need, emphasising the importance to be attached to specialist older persons housing provision.

The Guidance goes on to explain in paragraph 006 Reference ID: 63-006-20190626 that :-

"... These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or arrange for the number of units of specialist housing for older people needed across the plan area throughout the plan period." (my emphasis)

Whilst paragraph 013 Reference ID: 63-013-20190626 states:-

"It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers, and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation)."(my emphasis)

The same NPPG sets out at paragraph 010 Reference ID: 63-010-20190626 the different types of specialist housing for older people; all of which have differing consequences seen in terms of delivery; whilst the contents of paragraph 016 Reference ID: 63-016-20190626 are of relevance, highlighting the fact that:

"Decision-makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people... Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need."(my emphasis)

The West Berkshire Housing Needs Assessment Update published by Icen Projects Ltd on behalf of your Council states in paragraph 5.35

"It can be seen by 2039 there is an estimated need for 1,137 additional dwellings with support or care across the whole study area. In addition, there is a need for 1,032 additional nursing and residential care bedspaces. Typically for bedspaces it is conventional to convert to dwellings using a standard multiplier (1.80 bedspaces per dwelling for older persons accommodation) and this would therefore equate to around 573 dwellings. In total, the older persons analysis therefore points towards a need for around 1,710 units over the 2021- 39 period (95 per annum) – the older person need equates to some 19% of all homes needing to be for some form of specialist accommodation for older people."

These provisions are similarly reflected in the Housing Background Paper prepared by your Authority in January 2023.

I have previously referred in these representations to a proposed 64% change in the population of older persons of 75 years + between 2021 and 2039. This figure has to be examined in the context of the need for specialist housing for the elderly set out in paragraph

The LPR is to seek "specialist accommodation" as an integral part of the strategic housing allocations at Sandford Park and North East Thatcham. The only specialist older persons accommodation being

proposed is an Extra Care scheme on land at Stonehams Farm, Tilehurst, being the only allocated site for specialist elderly persons accommodation to 2039.

During the nine-year period commencing 2013/14 leading up to 2021/22, a total of 227 Class C2 rooms were completed, amounting to five schemes, of which 204 comprised three individual schemes in Newbury, revealing why it is considered that either further allocations should be made for specialist older persons housing, and/or the need for flexibility in the location of such specialist housing schemes in Policy DM1.

The Housing White Paper "*Fixing Our Broken Housing Market*" published by DCLG in February 2017 recognised the importance of "*offering older people a better choice of accommodation*" at the same time highlighting that "*helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers.*" It is noted that the same White Paper recognised the "*barriers to people moving out of family homes that they may have lived in for decades*" and the "*emotional attachment ... which means that where they are moving to needs to be very attractive to them and suitable for their needs over a twenty to thirty year period.*" The Housing White Paper clearly expresses the Government's commitment to "*exploring these issues further and finding sustainable solutions to any problems that may come to light.*"

The Government launched a Select Committee Inquiry into the issue of housing for older people in response to the House of Commons Communities and Local Government Committee (2018). The Inquiry report published in February 2018 aimed to reflect the diversity of older people in terms of their ages, individual circumstances, choices and preferences. It concluded inter alia that:

- A national strategy on housing provision for older people is needed, and should be introduced in consultation with older people and those who provide for them;
- Independent research should be commissioned on the wider housing market impact of older people moving to a smaller home that better suits their needs, to further explore frequent claims that this could be part of the solution to tackling the housing shortage;
- National planning policy should give greater encouragement to the development of housing for older people, ensuring that sites are available for a wider range of developers;
- The new standard approach to assessing housing need should explicitly address the complex and differing housing needs of older people;
- Older people should be able to choose from a wide choice of housing which can accommodate their needs and preferences, including smaller general needs housing, accessible housing, retirement homes, extra care housing and cohousing;
- Local authorities should produce strategies explaining how they intend to meet the housing needs of older people, with Local Plans identifying a target proportion of new housing to be developed for older people as well as suitable well-connected sites close to local communities; and
- Local authorities should be more receptive to private developers who wish to build housing for older people in their area, and appreciate the potential health and wellbeing benefits leading to reduced need for health and social care

Knight Frank in their 2021 Research Paper entitled "*Health Care Development Opportunities*" found that the UK health care market needs upgrading, with 71% of homes older than 20 years; at least 40% of homes having been converted from other uses and many be outdated, with 29% of beds lacking en-suite facilities. They forecast that the Covid-19 pandemic was likely to accelerate the closure of outdated homes and replace them with high quality assets. They went on to add that the Covid-19 pandemic would no doubt prompt a change in the way care homes are designed and configured, with particular emphasis placed on internal circulation, air quality and ventilation, with further focus directed towards transitional and communal space, with a view to maintaining an element of social distancing. A similar shift in preferences with greater attention is anticipated in respect to important outdoor and breakout spaces.

Levels of attrition involving the closing of care homes needs to be assessed in the future, with the average size of newly registered care homes across the country, i.e. those constructed in the last 56 years being 62 beds, contrasting with the average size of care homes closing over the same time period amounting to 29 beds.

It is also important to consider that there are a number of factors which affect the viability of developments relating to specialist housing for older people, one of the most significant being that they incorporate a significant provision of communal space and on-site facilities, in addition to individual rooms/units, and common parts evident in general need apartment blocks. As a result, the efficiency of age restrictive developments seen in terms of the floorspace of individual units (net) to the total floorspace (gross) is significantly poorer than in traditional or general needs housing. In short traditional general needs housing uses 100% in terms of net:gross efficiency, with a figure of 84% net:gross efficiency envisaged for apartments. Care homes, Extra Care facilities and sheltered living/retirement living apartments in contrast are only able to achieve between 40 and 75% net:gross efficiency.

In addition to these design considerations, there are higher construction costs, with greater requirements in terms of achieving higher accessibility requirements, comprising lifts, specially adapted bathrooms, treatment rooms, with those providing these important facilities relying on third party building contractors who are unable to secure the same economies of scale as volume housebuilders.

To these considerations should be added slower sales, given they are directed at a specialist older persons market, with the inability to phase flatted schemes to sales rates, resulting in higher finance costs for developments.

It is for a combination of these reasons that it is contended the LPR needs to be more proactive in delivering development to meet specialist older persons housing, which it is contended is not being met through the allocation of sites to meet these specialist housing needs. If this process is not addressed, with authorities relying on the market to bring forward sites, with viability assessments at the decision-taking stage, it is considered less likely that sites will come forward for this much needed use, although this situation can be alleviated by incorporating into Policy DM1 an exception in respect of specialist older persons housing subject to a quantitative and qualitative need accompanying any such submission.

	<p>These considerations which affect specialist older persons housing were accepted by the Inspector Harold Stephens in an appeal decision concerning land at Sonning Common (PINS Ref. No. APP/Q3115/W/20/235861), viz:-</p> <p><i>“117. Extra care housing undoubtedly operates in a very different market. Mr Garside provided detailed evidence to the inquiry how the market for land operates to the detriment of extra care operators. Extra care housing providers cannot compete with house builders or with other providers of specialist housing for older people because of the build costs, the level of the communal facilities and the additional sale costs including vacant property costs. The communal facilities must be provided before any units can be sold and sales tend to be slower. However, I accept that extra care schemes can charge a premium for the specialist accommodation provided and also benefit from an income from deferred management fees.</i></p> <p>1 <i>It seems to me that these factors, all mean that age restricted developments and in particular extra care communities are less viable than traditional housing schemes. Ultimately, age restricted developers are less able to pay the same price for land as residential developers and it is much harder for age restricted developers; and in particular those seeking to deliver extra care, to secure sites for development and meet the housing needs they aim to supply. Viability is clearly a relevant factor which supports the case under paragraph 172b) of the NPPF. There is also a strong case for the appeal scheme given the lack of alternative sites in the light of Policy H9 of the SOLP.”</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>There is a need in the evidence base to provide a detailed assessment of the different types of specialist housing for older people, which for various reasons cannot be successfully accommodated in adjoining authorities, in order to evaluate whether there are certain diverse links for older persons accommodation which are more likely to be met in West Berkshire. To consider housing solely from a generic basis where the form of housing is in critical need is not considered satisfactory, and more importantly, will only exacerbate the need in the future for older persons accommodation.</p>
<p>4. Proposed Changes</p>	<p>There is a need to adopt a more flexible approach towards specialist housing for older people, for which the Government confirms there is a critical need, so that emphasis can be placed on ensuring that their requirements are met, in the same way as is the case for the housing needs of travellers. Both travellers and older people comprise different groups within the community which are required to be assessed and reflected in planning policy, in accordance with paragraph 62 of the NPPF 2021.</p> <p>This means encompassing specialist housing for older people as a category which exceptionally may be provided as a form of residential development in the countryside, in accordance with Policy DM1, subject to a quantitative and qualitative need being shown. The significance of this proposed policy change is evident in appeal decisions where care proposals, both Extra Care and care homes, are being allowed in the countryside in locations not normally considered acceptable in planning terms, such as in the Metropolitan Green Belt; Area of Outstanding Natural Beauty and sites on the edges of small villages, as well as next to listed buildings and conservation areas. This is a reflection of Inspectors consistently recognising the national imperative of providing more care facilities in the light of the very clear instruction that the need is now critical. It is also the fact that a number of local authorities are failing to properly address or recognise that need.</p> <p>There is also a requirement to look at the qualitative need for specialist housing for older people, meaning an examination of the District's current care home stock, which includes converted buildings, along with attrition rates, i.e. the loss of care home facilities. The requirement in this respect should be based on an appropriate standard room, being a single occupancy room with en-suite toilet, wash basin and flat floor shower, i.e. a wet room, the latter being particularly important to avoid the risk of elderly people tripping or falling in the shower. It also requires a shower stool or seat to be placed within easy access in the shower. The appropriate standard in this respect is that envisaged by the Care Act 2014 Section 5 paragraph 1(b).</p> <p>This requirement is now all the more persuasive following the shocking evidence of those who have passed away in care homes due to the Covid-19 pandemic. It is not difficult to see why when so many people who passed away lived in accommodation focused on sharing facilities, which, post Covid, is now completely unacceptable. The extent to which there is an appropriate standard of accommodation should dictate the need in the future for all forms of specialist older persons housing in the LPR. In addition, there is a need to carry out an assessment as set out in answer to Question 3 above.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
<p>5. Independent Examination</p>	N/A
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	Yes

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 20 Gypsies, Travellers and Travelling Showpeople

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bracknell Forest Council
Consultee Full Name	Bracknell Forest Council
Consultee Organisation	Bracknell Forest Council
Agent Full Name	
Agent Organisation	
Comment ID	PS219
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 12:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>On the basis of the GTAA (2019), as set out in Table 7 of the LPR, the identified need for gypsies is 30 pitches (based on cultural need) and 20 (based on PPTS need) between 2021/22 and 2037/38 (which includes a shortfall between 2021/22 to 2025/26). Table 8 indicates there is a travelling show people requirement of 24 plots, and a need for four transit pitches. However, it is noted from the Plan (para. 11.35) that the longer term need for Gypsy and Traveller pitches and the need for transit sites will be addressed in a separate Development Plan Document, with evidence due to be prepared between 2023-2025, and anticipated adoption in 2027. It is assumed that the GTAA will be updated to reflect a new plan period, and should be seeking to meet cultural needs following the 2022 'Lisa Smith v SSLUHC [2022] EWHC' judgement.</p> <p>In relation to transit provision, the LPR states that collaborative working will be undertaken with neighbouring authorities (para. 11.26). However, BFC is of the view that transit provision is not a duty to co-operate matter. This follows legal advice in respect of the Criminal Justice and Public Order Act 1994. Under the latter, the police are unable to exercise their powers under sections 62A-E concerning the removal of a trespasser to an alternative site, if there is no suitable pitch or site within a Borough. This means that the matter must be addressed within each Council and does not therefore have cross boundary implications.</p> <p>Prior to submission of the BFLP, BFC undertook Duty to Co-operate discussions with adjoining LPAs in January 2021 (these being the authorities most likely to be able to meet local needs) asking for assistance from adjoining authorities in helping to meet its Gypsy and Traveller pitch needs. No LPA was in a position to assist. The Council proposed to release a site from the Green Belt on Land at Jealott's Hill (as part of a wider allocation in the area) to meet full cultural needs. However, in their post hearings letter the Inspectors conclude that the required exceptional circumstances for the Jealott's Hill allocation has not been evidenced and that a Main Modification is needed to remove the associated policy from the plan. They go on to conclude in paragraph 47 of their letter that because BFC can demonstrate a five-year supply of deliverable Gypsy and Traveller sites, and the BFLP has a windfall policy with a positive approach to development, that no further compensatory allocations are needed. This means that BFC is unable to help West Berks meet its Gypsy and Traveller pitch needs, should it be determined that there is unmet need within West Berks.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Aldermaston Parish Council
Consultee Full Name	Aldermaston Parish Council
Consultee Organisation	Aldermaston Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS431
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 16:10:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Typographic Error</p> <p>We believe there is a typographic error in para 11.31, and that the reference to Policy RSA32 should be to Policy RSA24 (the quoted reference seems to be to the current Plan)</p> <p>Misleading Text</p> <p>We feel the current wording of the Policy referred to in para 11.31 is misleading as the growth at Old Stocks Farm has already been approved (Planning Application 22/00120/FUL refers). In the unlikely event that further expansion at Old Stocks Farm is proposed, we would comment that the site is very close to AWE(A), and we have been advised by the WBC Planners that the protection against nuclear radiation is less for a mobile home than for a normal residential home. APC would therefore probably oppose any such expansion</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Canal & River Trust
<p>Consultee Full Name</p>	Mrs Jane Hennell
<p>Consultee Organisation</p>	Canal & River Trust
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS418
<p>Chapter / Policy / Appendix Number</p>	Policy DM 20
<p>Chapter / Policy / Appendix Title</p>	Gypsies, Travellers and Travelling Showpeople
<p>Order</p>	173
<p>Submission Type</p>	E-Mail

* E-Mail * Letter * Other * SMS * Web * Unknown	
Response Date	01/03/2023 14:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	It is noted that the GTAA does not identify a need for houseboat dwellers and thus the LPR does not provide for any permanent houseboats. The Canal & River Trust cannot comment on whether such a need exists, however any perceived need for residential moorings in the future should be discussed with the Canal & River Trust to ensure that suitable locations are considered.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Reading Borough Council
Consultee Full Name	Mark Worringham
Consultee Organisation	Reading Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS543
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 15:37:32
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where	Yes

<p>practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Policy DM20 deals with provision for gypsies, travellers and travelling showpeople. It is noted that the Local Plan does not meet the identified need for permanent gypsy and traveller pitches, and notes that a specific development plan document to deal with longer term need will be prepared.</p> <p>As set out in the Reading Borough Local Plan, RBC has unmet needs for permanent accommodation for gypsies and travellers. RBC's Gypsies and Travellers, Travelling Showpeople and Houseboat Dwellers Accommodation Assessment (September 2017) identified a need for 10-17 permanent pitches for gypsies and travellers. After thorough assessment of potential land within Reading, RBC has concluded that this need cannot be met within Reading.</p> <p>RBC therefore seeks to work with adjoining authorities to understand how these needs can best be met. On 21st February 2018, RBC made a request under the duty to co-operate to a number of authorities, including WBDC, to understand whether there is potential to meet these permanent needs outside Reading's boundaries. It remains the position that meeting Reading's permanent needs is likely to require provision outside our Borough, and therefore RBC is keen to work with WBDC on the development plan for gypsy and traveller provision to discuss wider needs within the area, as well as what resources would be required to help in meeting those needs.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	Yes

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wokingham Borough Council
Consultee Full Name	Wokingham Borough Council
Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1488
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comments
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Wokingham Borough Council (WBC) broadly supports West Berkshire District Council's (WBDC) approach to the provision of Gypsy and Traveller sites.</p> <p>WBDC published a 'Gypsy and Traveller and Travelling Showperson Accommodation Assessment' (GTAA) in 2019. A further GTAA Update was published in 2021 (GTAA 2021). The GTAA 2021 study identifies a cultural need for 30 pitches in the period 2021/22 – 2037/38. 20 of these pitches are for households that meet the definition of Gypsies and Travellers within the Planning Policy for Traveller Sites (PPTS). Further needs for a 4 pitch transit site (capable of accommodating 8 caravans) and 24 Travelling Showperson plots are identified.</p> <p>The Plan proposes to address this need through a combination of site allocations and a criteria based policy (Policy DM20). WBC notes that the Plan does not set a specific requirement for pitches, rather it simply notes the GTAA evidence. The criteria based policy supports the development of Gypsy and Traveller pitches and Travelling Showpeople plots where relevant criteria are satisfied. There is no requirement for strategic housing allocations to provide pitches or plots as part of a mix.</p> <p>WBC notes that the Plan does not contain allocations to meet cultural needs in full, and while the criteria based policy will facilitate the delivery of windfall pitches where appropriate, there are no estimates provided on how many pitches this would enable. It is therefore not possible to say with certainty that needs over the plan period will be met in full. However, WBDC has committed via its updated Local Development Scheme (LDS) to produce a Gypsy and Traveller Accommodation Development Plan Document (DPD). The LDS sets out that this will contain policies and allocations to meet the Gypsy and Traveller Accommodation Needs. On this basis, WBC supports the production of the separate DPD to meet needs in full, and raises no issues of soundness in relation to the Plan.</p> <p>As regards Travelling Showperson needs, Policy RSA25 proposes to allocate 24 Travelling Showperson plots. This would meet the identified need in full. WBC has no comments on this proposed allocation and supports the commitment to fully addressing Travelling Showperson need, which is considered sound.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>No comments</p>
<p>4. Proposed Changes</p>	<p>N/A</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Royal Borough of Windsor & Maidenhead
Consultee Full Name	Royal Borough Windsor & Maidenhead
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1537
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:51:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We also note that the identified shortfall in Gypsy, Traveller and Travelling Show People pitch provision is intended to be addressed via the preparation of a separate Development Plan document. The Royal Borough has also identified needs for Gypsies, Travellers and Travelling Show People and intends to produce a Traveller Local Plan in order to meet these needs, and as such we welcome West Berkshire's approach to meet the accommodation needs of these groups in full.</p> <p>In conclusion, the Royal Borough of Windsor and Maidenhead has no concerns or objections to the Regulation 19 version of the Local Plan Review.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Macro, Alan</p>
<p>Consultee Full Name</p>	<p>Councillor Alan Macro</p>

Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1460
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	Travelling showpeople are a separate community group and shouldn't be included in the same policy as gypsies and travellers
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	A separate policy should be written for travelling showpeople
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1550
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	<p>Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>We have reviewed Policy DM20 - Gypsies, Travellers and Travelling Showpeople, and as part of the criteria required to satisfy proposals for this type of development, point vii states, <i>"Development avoids areas of high flood risk and if required provide a Flood Risk Assessment, in accordance with Policy SP6: "</i></p> <p>As caravans are classed as 'highly vulnerable' under NPPF, we ask that the following wording is added to point vii to read;</p> <p><i>vii. 'Development avoids areas of high flood risk and if required provide a Flood Risk Assessment, in accordance with Policy SP6: "Caravans are not permitted in Flood Zone 3 as per Table 2 of the Planning Practice Guidance'.</i></p> <p>This is to ensure the policy is fully compliant with National Planning Policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>Policy DM20 - Gypsies, Travellers and Travelling Showpeople</p> <p>Caravans (associated with Gypsies, Travellers and Travelling Showpeople developments) are classed as 'highly vulnerable' under NPPF, we ask that the following wording is added to point vii as stated above.</p>

	<p>Including the suggested wording above will ensure the policy is fully compliant with National Planning Policy.</p> <p><i>"Development avoids areas of high flood risk and if required provide a Flood Risk Assessment, in accordance with Policy SP6. Caravans will not be or are not permitted in Flood Zone 3 as per Table 2 of the Planning Practice Guidance".</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	We wish to attend the examination for an opportunity to explain the need to include the suggested wording to ensure these types of developments are not at risk of flooding.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Basingstoke & Deane Borough Council
Consultee Full Name	Anne Shattock
Consultee Organisation	Basingstoke & Deane Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1724
Chapter / Policy / Appendix Number	Policy DM 20
Chapter / Policy / Appendix Title	Gypsies, Travellers and Travelling Showpeople
Order	173
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	01/03/2023 09:25:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a</p>	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The draft Plan also sets out the council's strategy for meeting gypsy and traveller needs, including through the replacement of transit pitches with permanent pitches at New Stocks Farm on Paices Hill (Policies DM20 and RSA24). Although Policy DM20 states that 'The Council will meet the identified need... by allocating land for plots and/or pitches' it appears that there would still be an overall shortfall in pitches (as explained in para 11.35). It is acknowledged that the council have committed to producing a DPD in respect of longer term pitch requirements and transit sites/short term stopping places. BDBC wishes to ensure that WBC has a robust strategy to meet its gypsy and traveller needs in full to ensure that those needs would not need to be met in Basingstoke and Deane.</p> <p>In light of the above, BDBC has concerns about the shortfall in provision in terms of both employment, and gypsy and traveller pitch provisions, and is keen to continue to engage in suitable discussions under the Duty to Cooperate in relation to these issues.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan</p>	

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy DM 21 Retention of Mobile Home Parks

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stratfield Mortimer Parish Council
Consultee Full Name	Lynn Hannawin
Consultee Organisation	Stratfield Mortimer Parish Council
Agent Full Name	Lynn Hannawin
Agent Organisation	
Comment ID	PS610
Chapter / Policy / Appendix Number	Policy DM 21
Chapter / Policy / Appendix Title	Retention of Mobile Home Parks
Order	176
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:49:20
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>As a parish council we do not seem to be informed about changes to mobile home parks which may be reducing the number of homes and would wish to see this as part of the planning process so we can engage in safeguarding their loss as affordable housing.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Macro, Alan</p>
<p>Consultee Full Name</p>	<p>Councillor Alan Macro</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1461</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 21</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Retention of Mobile Home Parks</p>
<p>Order</p>	<p>176</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	<p>E-Mail</p>

* Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	

Policy DM 22 Residential Use of Space above Non-residential Units

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS642
Chapter / Policy / Appendix Number	Policy DM 22
Chapter / Policy / Appendix Title	Residential Use of Space above Non-residential Units
Order	177
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 47. DM22. 11.45. This statement needs to be reinstated.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Policy DM 23 Housing Related to Rural Workers

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1282
Chapter / Policy / Appendix Number	Policy DM 23
Chapter / Policy / Appendix Title	Housing Related to Rural Workers
Order	178
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We believe this policy is not justified in demanding that such developments have “no adverse impact on the rural character...” (etc.) because there will be so much change in the nature and national importance of land based businesses, owing to needs of food security and changes to agriculture, also to the factors influencing “sustainability” in all three dimensions, that this is too restrictive.</p> <p>For example, housing workers close to, but not within a rural settlement – let alone the nearest town – might incur more travel and transport related carbon emissions and deny a village school and shop the additional customers it needs to survive economically and the rural community to flourish socially. Meanwhile it might increase peak hour congestion in urban areas caused by journeys that would not be needed if the worker lived near to their workplace.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>In 'g', insert “significant” before adverse.</p> <p>In 11.43 replace “nearby” with “within or near to” in line 1 and in the last sentence after “workplace” insert “the overall sustainability of siting the accommodation nearer to the workplace than policy would otherwise allow,”</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To expand on our Viable Villages concept and why we believe the evidence leads to a more flexible attitude towards development in the countryside.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>

Policy DM 24 Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gent, (Represented by Pro Vision)
Consultee Full Name	Mr and Mrs Gent
Consultee Organisation	
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS475
Chapter / Policy / Appendix Number	Policy DM 24
Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 12:39:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Specifically, this representation is made in relation to Policy DM24. The Policy confirms that the conversion of redundant or disused buildings in the 'countryside' to residential use will be supported provided they meet the criteria listed.</p> <p>This Policy follows a similar content and structure to Policy C4 of the Housing Site Allocations DPD (adopted 2017). Furthermore, the support for conversion of buildings to new homes in the 'countryside' is supported in the National Planning Policy Framework ('the Framework') at paragraph 80 c.</p> <p>Our client, in principle, supports the inclusion of Policy DM24 in the Plan. However, they have concerns regarding the soundness of some of the specific criteria and wording in the Policy which has the potential to undermine its success in delivery housing in the 'countryside'.</p> <p>Submissions on the criteria and wording of Policy DM24</p> <p><u>The Policy</u></p> <p>It is considered that some of the criteria (e.g heritage c., amenity e., ecology i.) in the Policy simply require consideration of other Development Plan policies. Therefore, for clarity and ease these should be removed as they are unnecessary duplication. There also appears to be no justification why some matters are included and others not. For example, there is no criteria/cross reference to policies on highway safety or drainage. Alternatively, the Policy could simply state that any proposal should comply with other relevant policies within the Development Plan.</p> <p><i>f. It has no adverse impact on rural character</i></p> <p>This criteria is not justified and does not accord with national policy and paragraph 80 c which simply refers to an enhancement of the immediate setting. It cannot be sensibly applied that this is a 'zero harm' policy/criteria - indeed, if it were, any conversion of agricultural buildings to residential use would infringe it. The criteria should be re-worded to: 'seeks to respect the prevailing rural character of the area'. This should advocate a balanced planning judgement</p> <p><i>g. The existing vehicular access is suitable in landscape terms for the use proposed</i></p> <p>This criteria goes beyond that required by national policy and is essentially 'double counting' as any harm to the rural character of the area/landscape from the proposal (including its access) would also be considered under criteria f (see comments above). It is not clear what the Council is trying to achieve with this criteria.</p> <p><i>h. The creation of the residential curtilage would not be visually intrusive, have a harmful effect on the rural character of the site, or its setting in the wider landscape; and</i></p> <p>Similar comments to criteria f and g. The impact of the curtilage would be considered under criteria f and it cannot sensibly be applied that this is a 'zero harm' policy/criteria. All proposed changes from agriculture to residential use would involve the need to provide amenity space (e.g. garden land) as part of the residential curtilage which would by definition include a degree of harm to the character of the area/landscape.</p> <p><i>There will be a presumption against permission being granted for replacement building(s) pursuant to a change to a residential use established under this Policy</i></p> <p>This statement is contrary to Section 38(6) of the Planning and Compulsory Purchase Act 2004. This confirms that there may be other material considerations that indicate that a proposal should be determined other than in accordance with the Development Plan. The statement is also vague and ambiguous.</p> <p>It appears that the Council are concerned that a proposal that accords with this conversion Policy could subsequently be used as a 'fallback' position to support new build development in the countryside. However, there may be circumstances where a new build/replacement proposal, in comparison to a conversion scheme, will have significant benefits and be considered preferable.</p> <p>As a result, it is considered that rather than seeking to restrict development the Policy could be positively worded to allow new build/replacement proposals - where it has been proven that the conversion of the existing building(s) would comply with the criteria of Policy DM24 - that deliver an improved and enhanced development.</p> <p>This approach follows the Government's agenda of promoting and increasing high quality design and paragraph 8 of the Framework that seeks opportunities to secure 'net gains' across the different sustainability objectives, including environmental. The North Wessex Downs AONB Management Plan also supports achieving 'net gains' in landscape character and natural beauty.</p> <p>Supporting Text</p> <p>Paragraph 11.50 notes that the Policy applies to all structurally sound buildings, including traditional farmsteads or buildings. The paragraph however goes on to add that the Policy is not intended to encourage the retention of buildings that currently have adverse visual/landscape impact such as large agricultural sheds.</p> <p>As such, whilst the paragraph notes that the Policy applies to all structurally sound buildings, the Council appear to be implying that traditional and historic farm buildings are more likely to be considered acceptable for conversion under this Policy than more 'modern' large agricultural sheds. The Council's approach is unsound as it is not justified and national Policy does not make any such distinction or assume that all 'large agricultural sheds' are not structurally sound or inappropriate for conversion to residential use.</p>

	<p>This text therefore may influence the decision-makers assessment of these types of buildings when considered against the criteria in the Policy.</p> <p>It is considered that this last sentence in the supporting text should be removed as each case should be considered on its merits and supported by the appropriate evidence e.g structural survey.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Accordingly, the Council's approach to conversion of existing buildings in the countryside to residential use does not meet the following tests for soundness: justified or consistent with national Policy and paragraph 80 c. The Policy is not clearly written with issues muddled between criteria and repetition of other policies that may only be relevant in some circumstances. As such, the Policy as currently worded is likely to lead to uncertainty in decision-making.</p> <p>For the Policy to be sound it is recommended that the following changes are made:</p> <p>Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use</p> <p><i>The conversion of existing redundant or disused buildings in the countryside to residential use will be supported provided that the following criteria are satisfied:</i></p> <p><i>a. The proposal involves a building that is structurally sound and capable of conversion without substantial rebuilding, extension or alteration;</i></p> <p><i>b. The applicant can prove the building is genuinely redundant or disused;</i></p> <p><i>c. Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12;</i></p> <p><i>d. The proposal respects and retains the character, fabric and distinctive features of the building and uses matching materials where those materials are an essential part of the character of the building and locality;</i></p> <p><i>e. The site and location is suitable for residential use and gives a satisfactory level of amenity for occupants;</i></p> <p><i>f. It has no adverse impact on <u>seeks to respect the prevailing rural character of the area</u>;</i></p> <p><i>g. The existing vehicular access is suitable in landscape terms for the use proposed;</i></p> <p><i>h. The creation of the residential curtilage would not be visually intrusive, have a harmful effect on the rural character of the site, or its setting in the wider landscape; and</i></p> <p><i>i. The impact on any protected species is assessed and appropriate avoidance and mitigation measures are implemented to ensure any protected species are not adversely affected.</i></p> <p><i>[new criteria] accords with other relevant policies in the Development Plan (e.g on heritage, amenity and ecology)</i></p> <p><i>There will be a presumption against permission being granted for replacement building(s) pursuant to a change to a residential use established under this Policy.</i></p> <p><i>There is a presumption in favour of the conversion of existing buildings in the countryside to residential use in accordance with the above criteria unless there are clear benefits for doing otherwise (e.g a new build/replacement proposal) when considered against other policies in the Plan. For example, this may include [but not limited to]: enhancement to the setting of heritage assets and the landscape/character of the area; energy efficiency gains; remediation of contamination or reducing flood risk.</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes</p>	<p>Yes</p>

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Trustees of Allan Snook Will Trust (Represented by Pro Vision)
Consultee Full Name	Trustees of Allan Snook Will Trust
Consultee Organisation	Trustees of Allan Snook Will Trust
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS1095
Chapter / Policy / Appendix Number	Policy DM 24
Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 14:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The Policy confirms that the conversion of redundant or disused buildings in the 'countryside' to residential use will be supported provided they meet the criteria listed.</p> <p>This Policy follows a similar content and structure to Policy C4 of the Housing Site Allocations DPD (adopted 2017). Furthermore, the support for conversion of buildings to new homes in the 'countryside' is supported in the National Planning Policy Framework ('the Framework') at paragraph 80 c. Our client, in principle, supports the inclusion of Policy DM24 in the Plan. However, they have concerns regarding the soundness of some of the specific criteria and wording in the Policy which has the potential to undermine its success in delivery housing in the 'countryside'.</p> <p><u>The Policy</u></p> <p>It is considered that some of the criteria (e.g heritage c., amenity e., ecology i.) in the Policy simply require consideration of other Development Plan policies. Therefore, for clarity and ease these should be removed as they are unnecessary duplication. There also appears to be no justification why some matters are included and others not. For example, there is no criteria/cross reference to policies on highway safety or drainage. Alternatively, the Policy could simply state that any proposal should comply with other relevant policies within the Development Plan.</p> <p><i>f. It has no adverse impact on rural character</i></p> <p>This criteria is not justified and does not accord with national policy and paragraph 80 c which simply refers to an enhancement of the immediate setting. It cannot be sensibly applied that this is a 'zero harm' policy/criteria - indeed, if it were, any conversion of agricultural buildings to residential use would infringe it. The criteria should be re-worded to: 'seeks to respect the prevailing rural character of the area'. This should advocate a balanced planning judgement.</p> <p><i>g. The existing vehicular access is suitable in landscape terms for the use proposed</i></p> <p>This criteria goes beyond that required by national policy and is essentially 'double counting' as any harm to the rural character of the area/landscape from the proposal (including its access) would also be considered under criteria f (see comments above). It is not clear what the Council is trying to achieve with this criteria.</p> <p><i>h. The creation of the residential curtilage would not be visually intrusive, have a harmful effect on the rural character of the site, or its setting in the wider landscape; and</i></p> <p>Similar comments to criteria f and g. The impact of the curtilage would be considered under criteria f and it cannot sensibly be applied that this is a 'zero harm' policy/criteria. All proposed changes from agriculture to residential use would involve the need to provide amenity space (e.g. garden land) as part of the residential curtilage which would by definition include a degree of harm to the character of the area/landscape.</p> <p><i>There will be a presumption against permission being granted for replacement building(s) pursuant to a change to a residential use established under this Policy</i></p> <p>This statement is contrary to Section 38(6) of the Planning and Compulsory Purchase Act 2004. This confirms that there may be other material considerations that indicate that a proposal should be determined other than in accordance with the Development Plan. The statement is also vague and ambiguous. It appears that the Council are concerned that a proposal that accords with this conversion Policy could subsequently be used as a 'fallback' position to support new build development in the countryside. However, there may be circumstances where a new build/replacement proposal, in comparison to a conversion scheme, will have significant benefits and be considered preferable.</p> <p>As a result, it is considered that rather than seeking to restrict development the Policy could be positively worded to allow new build/replacement proposals - where it has been proven that the conversion of the existing building(s) would comply with the criteria of Policy DM24 - that deliver an improved and enhanced development.</p> <p>This approach follows the Government's agenda of promoting and increasing high quality design and paragraph 8 of the Framework that seeks opportunities to secure 'net gains' across the different sustainability objectives, including environmental. The North Wessex Downs AONB Management Plan also supports achieving 'net gains' in landscape character and natural beauty.</p> <p><u>Supporting Text</u></p> <p>Paragraph 11.50 notes that the Policy applies to all structurally sound buildings, including traditional farmsteads or buildings. The paragraph however goes on to add that the Policy is not intended to encourage the retention of buildings that currently have adverse visual/landscape impact such as large agricultural sheds.</p> <p>As such, whilst the paragraph notes that the Policy applies to all structurally sound buildings, the Council appear to be implying that traditional and historic farm buildings are more likely to be considered acceptable for conversion under this Policy than more 'modern' large agricultural sheds. The Council's approach is unsound as it is not justified and national Policy does not make any such distinction or assume that all 'large agricultural sheds' are not structurally sound or inappropriate for conversion to residential use.</p>

	<p>This text therefore may influence the decision-makers assessment of these types of buildings when considered against the criteria in the Policy.</p> <p>It is considered that this last sentence in the supporting text should be removed as each case should be considered on its merits and supported by the appropriate evidence e.g structural survey.</p> <p>Accordingly, the Council's approach to conversion of existing buildings in the countryside to residential use does not meet the following tests for soundness: justified or consistent with national Policy and paragraph 80 c. The Policy is not clearly written with issues muddled between criteria and repetition of other policies that may only be relevant in some circumstances. As such, the Policy as currently worded is likely to lead to uncertainty in decision-making.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use</i> The conversion of existing redundant or disused buildings in the countryside to residential use will be supported provided that the following criteria are satisfied:</p> <p><i>a. The proposal involves a building that is structurally sound and capable of conversion without substantial rebuilding, extension or alteration;</i> <i>b. The applicant can prove the building is genuinely redundant or disused;</i> <i>c. Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12;</i> <i>d. The proposal respects and retains the character, fabric and distinctive features of the building and uses matching materials where those materials are an essential part of the character of the building and locality;</i> <i>e. The site and location is suitable for residential use and gives a satisfactory level of amenity for occupants;</i> <i>f. It has no adverse impact on seeks to respect the prevailing rural character of the area;</i> <i>g. The existing vehicular access is suitable in landscape terms for the use proposed;</i> <i>h. The creation of the residential curtilage would not be visually intrusive, have a harmful effect on the rural character of the site, or its setting in the wider landscape; and</i> <i>i. The impact on any protected species is assessed and appropriate avoidance and mitigation measures are implemented to ensure any protected species are not adversely affected.</i> <i>[new criteria] accords with other relevant policies in the Development Plan (e.g on heritage, amenity and ecology)</i></p> <p><i>There will be a presumption against permission being granted for replacement building(s) pursuant to a change to a residential use established under this Policy.</i> <i>There is a presumption in favour of the conversion of existing buildings in the countryside to residential use in accordance with the above criteria unless there are clear benefits for doing otherwise (e.g a new build/replacement proposal) when considered against other policies in the Plan. For example, this may include [but not limited to]: enhancement to the setting of heritage assets and the landscape/character of the area; energy efficiency gains; remediation of contamination or reducing flood risk.</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes</p>	<p>Yes</p>

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rivar Ltd (Represented by Pro Vision)
Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS1387
Chapter / Policy / Appendix Number	Policy DM 24
Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.
* Yes
* No

Please give reasons for your answer

West Berkshire Local Plan Review – Proposed Submission (January 2023)

Pro Vision is instructed by Rivar Ltd. to submit representations in response to the West Berkshire Council ('the Council') Regulation 19 Consultation on the proposed submission version of the Local Plan Review (LPR) to 2039, herein after referred to as the 'the Plan'.

This representation is not made in relation to any particular site, albeit related generally to our client's land interests at various locations within the district, and in the interests of contributing to a sound plan.

Submissions on Policy DM24 - Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use

The Policy

It is considered that some of the criteria (e.g heritage c., amenity e., ecology i.) in the Policy simply require consideration of other Development Plan policies. Therefore, for clarity and ease these should be removed as they are unnecessary duplication. There also appears to be no justification why some matters are included and others not. For example, there is no criteria/cross reference to policies on highway safety or drainage. Alternatively, the Policy could simply state that any proposal should comply with other relevant policies within the Development Plan.

f. It has no adverse impact on rural character

This criteria is not justified and does not accord with national policy and paragraph 80 c which simply refers to an enhancement of the immediate setting. It cannot be sensibly applied that this is a 'zero harm' policy/criteria - indeed, if it were, any conversion of agricultural buildings to residential use would infringe it. The criteria should be re-worded to: 'seeks to respect the prevailing rural character of the area'. This should advocate a balanced planning judgement.

g. The existing vehicular access is suitable in landscape terms for the use proposed

This criteria goes beyond that required by national policy and is essentially 'double counting' as any harm to the rural character of the area/landscape from the proposal (including its access) would also be considered under criteria f (see comments above). It is not clear what the Council is trying to achieve with this criteria.

h. The creation of the residential curtilage would not be visually intrusive, have a harmful effect on the rural character of the site, or its setting in the wider landscape; and

Similar comments to criteria f and g. The impact of the curtilage would be considered under criteria f and it cannot sensibly be applied that this is a 'zero harm' policy/criteria. All proposed changes from agriculture to residential use would involve the need to provide amenity space (e.g. garden land) as part of the residential curtilage which would by definition include a degree of harm to the character of the area/landscape.

There will be a presumption against permission being granted for replacement building(s) pursuant to a change to a residential use established under this Policy.

This statement is contrary to Section 38(6) of the Planning and Compulsory Purchase Act 2004. This confirms that there may be other material considerations that indicate that a proposal should be determined other than in accordance with the Development Plan. The statement is also vague and ambiguous.

It appears that the Council are concerned that a proposal that accords with this conversion Policy could subsequently be used as a 'fallback' position to support new build development in the countryside. However, there may be circumstances where a new build/replacement proposal, in comparison to a conversion scheme, will have significant benefits and be considered preferable.

As a result, it is considered that rather than seeking to restrict development the Policy could be positively worded to allow new build/replacement proposals - where it has been proven that the conversion of the existing building(s) would comply with the criteria of Policy DM24 - that deliver an improved and enhanced development. This approach follows the Government's agenda of promoting and increasing high quality design and paragraph 8 of the Framework that seeks opportunities to secure 'net gains' across the different sustainability objectives, including environmental. The North Wessex Downs AONB Management Plan also supports achieving 'net gains' in landscape character and natural beauty.

Supporting Text

Paragraph 11.50 notes that the Policy applies to all structurally sound buildings, including traditional farmsteads or buildings. The paragraph however goes on to add that the Policy is not intended to encourage the retention of buildings that currently have adverse visual/landscape impact such as large agricultural sheds.

As such, whilst the paragraph notes that the Policy applies to all structurally sound buildings, the Council appear to be implying that traditional and historic farm buildings are more likely to be considered acceptable for conversion under this Policy than more 'modern' large agricultural sheds. The Council's approach is unsound as it is not justified and national Policy does not make any such distinction or assume that all 'large agricultural sheds' are not structurally sound or inappropriate for conversion to residential use. This text therefore may influence the decision-makers assessment of these types of buildings when considered against the criteria in the Policy.

It is considered that this last sentence in the supporting text should be removed as each case should be considered on its merits and supported by the appropriate evidence e.g structural survey.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?
 * Yes
 * No

Please give reasons for your answer

4. Proposed Changes

Proposed Amendments to Policy DM24

Accordingly, the Council's approach to conversion of existing buildings in the countryside to residential use does not meet the following tests for soundness: justified or consistent with national Policy and paragraph 80 c. The Policy is not clearly written with issues muddled between criteria and repetition of other policies that may only be relevant in some circumstances. As such, the Policy as currently worded is likely to lead to uncertainty in decision-making.

For the Policy to be sound it is recommended that the following changes are made:

Policy DM24

	<p>Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use</p> <p>The conversion of existing redundant or disused buildings in the countryside to residential use will be supported provided that the following criteria are satisfied:</p> <p>a. The proposal involves a building that is structurally sound and capable of conversion without substantial rebuilding, extension or alteration;</p> <p>b. The applicant can prove the building is genuinely redundant or disused;</p> <p>c. Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12;</p> <p>d. The proposal respects and retains the character, fabric and distinctive features of the building and uses matching materials where those materials are an essential part of the character of the building and locality;</p> <p>e. The site and location is suitable for residential use and gives a satisfactory level of amenity for occupants;</p> <p>f. It has no adverse impact on <u>seeks to respect the prevailing rural character of the area</u>;</p> <p>g. The existing vehicular access is suitable in landscape terms for the use proposed;</p> <p>h. The creation of the residential curtilage would not be visually intrusive, have a harmful effect on the rural character of the site, or its setting in the wider landscape; and</p> <p>i. The impact on any protected species is assessed and appropriate avoidance and mitigation measures are implemented to ensure any protected species are not adversely affected.</p> <p>[new criteria] accords with other relevant policies in the Development Plan (e.g on heritage, amenity and ecology)</p> <p>There will be a presumption against permission being granted for replacement building(s) pursuant to a change to a residential use established under this Policy.</p> <p>There is a presumption in favour of the conversion of existing buildings in the countryside to residential use in accordance with the above criteria unless there are clear benefits for doing otherwise (e.g a new build/replacement proposal) when considered against other policies in the Plan. For example, this may include [but not limited to]: enhancement to the setting of heritage assets and the landscape/character of the area; energy efficiency gains; remediation of contamination or reducing flood risk.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	TA Fisher & Sons Ltd (Represented by Pro Vision)
Consultee Full Name	TA Fisher & Sons Ltd
Consultee Organisation	TA Fisher & Sons Ltd
Agent Full Name	Miss Katherine Miles
Agent Organisation	Pro Vision Planning & Design
Comment ID	PS1372
Chapter / Policy / Appendix Number	Policy DM 24

Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>This policy is not consistent with paragraph 80 of the NPPF as there are a number of detailed criteria which are not necessary and/or duplication.</p> <p>The last paragraph of policy DM24 states that "There will be a presumption against permission being granted for replacement building(s) pursuant to a change to a residential use established under this policy". This is contrary to section 38(6) of the Planning and Compulsory Purchase Act 2004 that requires planning applications be determined "in accordance with the policies of the Development Plan, unless material considerations indicate otherwise" and contrary to established case law on fallback positions. This paragraph should therefore be removed.</p>

	Accordingly, the Council's housing trajectory fails to meet the test for soundness in the NPPF (2021) as the LPR is not positively prepared, justified effective or consistent with national policy.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	The last paragraph should be removed.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To ensure that the views of our client in respect of the spatial strategy, and particular the failure to recognise Mortimer as a Rural Service Village and fail to allocate sites to support the vitality of this village are heard
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1781
Chapter / Policy / Appendix Number	Policy DM 24
Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The overall approach of draft LPR Policy DM24 to supporting conversion of redundant or disused buildings in the countryside to residential use is supported. As above, it is however recommended that the reference to 're-use' of redundant or disused buildings is retained, in line with NPPF paragraph 80, in order to clarify that existing buildings can be brought back into use as well as being converted to a different use.</p> <p>Part b requires the applicant to prove that the building is genuinely redundant or disused and it is welcomed that paragraph 11.63 provides additional clarity to help this determination. In particular it is noted that the Council will consider whether the original use and purpose of the building exists and it is welcomed that 'the Council will take account of all the circumstances' together in making a judgement. The deletion of the need to satisfy 'all' of the criteria is also welcomed. This will help to enable a balanced judgement to be taken having regard to the overall criteria and the economic, social and environmental benefits.</p> <p>We are however concerned that the draft policy contains a number of detailed criteria with unnecessary duplication of other policies (e.g. relating to heritage, amenity, access and ecology), and a requirement to 'retain' features and fabric for instance, which may prejudice suitable development being delivered in rural areas. As noted above, the Estate's experience previously is that similar policies have been applied to prohibit development, and instead it is important that a positive approach is taken towards new development in the countryside in line with NPPF paragraphs 78-79.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes

Please give reasons for your answer	
4. Proposed Changes	<p>The following changes are recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:</p> <p><i>'The conversion or re-use of existing redundant or disused buildings in the countryside to residential use will be supported provided that the following criteria are satisfied...'</i></p> <p><i>'c. Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12;'</i></p> <p><i>'d. The proposal respects and retains the character, fabric and distinctive features of the building and uses matching materials where those materials are an essential part of the character of the building and locality;'</i></p> <p><i>'e. The site and location is suitable for residential use and gives a satisfactory level of amenity for occupants;'</i></p> <p><i>'g. The existing vehicular access is suitable in landscape terms for the use proposed;'</i></p> <p><i>'i. The impact on any protected species is assessed and appropriate avoidance and mitigation measures are implemented to ensure any protected species are not adversely affected.'</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1283
Chapter / Policy / Appendix Number	Policy DM 24
Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>It is not easy to decide whether a building is structurally unsound. While an applicant is considering whether to retain a building that they no longer have use for, its condition can deteriorate from being 'sound' to being dangerous. Adding this to the list of criteria to be met before planning consent can be given simply adds to the cost and delay and makes it likely that we will have more unsightly crumbling buildings in our rural landscape. Such buildings are all too common a feature of the countryside in areas where local policy is unduly strict on this.</p> <p>This policy adds to the cost and delays of what could be beneficial restoration of buildings with character that befits their setting. It is not really the business of planners but of structural engineers and cost accountants – and, as regards legislation, of Building Regulations – to determine whether it is 'worth' retaining a building because of its poor structural condition.</p> <p>We prefer to see the planning decision focus on the outcome of any restoration and re-use and also whether its restoration will result in fewer carbon emissions than if the embedded energy in its original construction is allowed to go to waste. We have no problem with the other criteria listed, but if these are all met, we can see no good reason to condemn a structurally unsound but otherwise potentially harmless building, that could find a new use.</p>

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	In 'a', insert "permanent" before "building" and delete the words "structurally sound and". In 'f', add "significant" before "adverse". In 11.50, replace "structurally sound" with "substantially entire". Reword 11.51 in entirety: "This policy will allow the retention for residential use of any redundant or derelict building in the countryside that retains a significant element of character that is appropriate in its rural setting, irrespective of its structural soundness. The judgement as to whether to allow its conversion should not be based on matters that in legislation properly belong to Building Regulations, but should depend on whether its planned use and design are in accordance with national and local planning policy alone – in particular DM1 - and are suited to the particular location." In 11.53 last line replace "can" with "should". Delete 11.57 and re-number.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I may wish to give examples of how such buildings have been restored well and also of where they have been allowed to crumble because the current local policy has insisted on structural soundness as a criteria; also same as DM23. Ideally in the same oral session as SP1, DM1/23/31.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1462
Chapter / Policy / Appendix Number	Policy DM 24
Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other	E-Mail

* SMS * Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Policies supported
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1563
Chapter / Policy / Appendix Number	Policy DM 24
Chapter / Policy / Appendix Title	Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use
Order	179
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	We have reviewed Policy DM24 - Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use, and to strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed conversion development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors. See the suggested wording in section 4.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.
4. Proposed Changes	To strengthen this policy text to ensure that it adheres to national policy, we ask that it includes these bullet points (the criteria required to satisfy proposals for this type of development) suggested below to ensure any proposed conversion development is not at risk of flood risk and would not cause any detrimental impact to sensitive receptors. <ul style="list-style-type: none"> • <u>Development avoids areas of high flood risk and adheres to the requirements of PPG and NPPF and if required provide a Flood Risk Assessment, in accordance with Policy SP6</u> • <u>Development will address all environmental concerns/constraints such as wastewater drainage, to ensure the development is sustainable.</u>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We wish to attend the examination for an opportunity to explain the need to include the suggested wording to ensure these types of developments are not at risk of flooding and would not have a negative impact on sensitive receptors.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 25 Replacement of Existing Dwellings in the Countryside

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liebreich Associates (Represented by Plainview Planning)
Consultee Full Name	Bex Dorey - Verhaeg
Consultee Organisation	Liebreich Associates
Agent Full Name	Bex Dorey-Verhaeg
Agent Organisation	Plainview Planning
Comment ID	PS1508
Chapter / Policy / Appendix Number	Policy DM 25
Chapter / Policy / Appendix Title	Replacement of Existing Dwellings in the Countryside
Order	180
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 12:09:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	Policies have not given appropriate regard to climate change, sustainability or delivering environmental enhancements.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Essentially we believe the spatial strategy is flawed and there are inconsistencies within the plan. The plan does not wholly conform to the policies of the Framework.</p> <p>The supporting text sets out that there is evidence that small rural properties in the AONB have previously been demolished and replaced with substantial new properties that do not reflect the local context. The supporting text then goes on to note that there are no rules that can be applied as to the acceptable size of a replacement dwelling; noting that size increase has to be considered on the basis of the impact of a particular property in a particular location.</p> <p>It is clear that Policy DM25 is underpinned by the objective to protect and enhance the landscape. However, the policy fails to encourage landscape enhancements from the outset. There is no mechanism to afford weight to environmental enhancements, sustainable design or innovative design. Instead the policy text focuses on 'proportionate in size' and preventing adverse impacts. The only element where landscape and environmental enhancements can be considered is through the resiting of replacement dwellings.</p> <p>This policy does not reflect the clear intention of the policy, as set out in the supporting text; which is to improve the landscape character and visual appearance of the site.</p> <p>The policy text relating to curtilage appears unsubstantiated and short sighted and overly prescriptive. Each site needs to be considered on its own merits and the policy doesn't allow for that. 'There is no extension of the existing curtilage, unless it is necessary to provide additional parking or amenity space to be consistent with dwellings in the immediate vicinity; This policy is incredibly restrictive and does not allow for any flexibility or recognise that there may indeed be cases where an existing building and/or curtilage may be inappropriately located and that there could be improvements through amending/altering/moving the building and/or its curtilage. Opportunities for improving the landscape character or overall appearance of the site would be missed.</p> <p>This policy does not link with criteria b of this policy, which does allow for replacement dwellings to be located on a different area of the site if positive benefits can be demonstrated. This approach should be taken into account within criteria g.</p> <p>This policy provides a mechanism to encourage landscape, biodiversity, environmental and sustainability benefits through replacement dwellings. We support this policy, however we are of the opinion that the support and consideration of enhancements shouldn't be limited to the placement/siting of a replacement dwelling.</p> <p>We therefore suggest that the policy is amended to clearly set out that weight will be afforded to developments that provide enhancements to the landscape, biodiversity, sustainability and/or innovative and/or high quality design.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Policy DM25 should be amended to:</p> <p>The replacement of an existing dwelling of permanent construction in the countryside with another dwelling will be supported providing that the following criteria are satisfied:</p> <ol style="list-style-type: none"> 1 The existing dwelling is not subject to a condition limiting the period of use as a dwelling; 2 The replacement dwelling is located on the footprint of the existing building unless alternative siting has a positive benefit on the impact on the countryside or other environmental benefits can be demonstrated; 3 The replacement dwelling is proportionate in size and scale to the existing dwelling, uses appropriate materials and sustainable technologies in accordance with Policy SP7, and does not have an adverse impact on: <ol style="list-style-type: none"> 1 The character and local distinctiveness of the rural area; 2 Individual heritage assets and their settings; 3 Its setting within the wider landscape; 4 <u>Any amendments to curtilage will be assessed on a case by case basis; amendments to curtilage must not cause landscape harm and must respect the character of the area.</u> 5 Where the existing dwelling forms part of an agricultural or other land based rural business and is an essential part of that business, the replacement dwelling must continue to perform the same function. An occupancy condition may be applied; and 6 The impact on any protected species is assessed and appropriate avoidance and mitigation measures are implemented to ensure any protected species are not adversely affected.

	7 <u>Positive weight will be afforded to developments that exceed sustainability standards, that provide enhancements to the landscape, enhance local character and provide biodiversity enhancements beyond the requirements of BNG.</u>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1463
Chapter / Policy / Appendix Number	Policy DM 25
Chapter / Policy / Appendix Title	Replacement of Existing Dwellings in the Countryside
Order	180
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	Points (d), (e) and (f) should be subservient to point (c). Otherwise, policy is supported.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Points (d) to (f) should be renumbered in a different series to (a) to (c), and points (f) to (i) renumbered from (d) to (g)
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1564
Chapter / Policy / Appendix Number	Policy DM 25
Chapter / Policy / Appendix Title	Replacement of Existing Dwellings in the Countryside
Order	180
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	We have reviewed Policy DM25 - Replacement of Existing Dwellings in the Countryside and to strengthen this policy text to ensure that it is also sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors. See the suggested wording in section 4.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.
<p>4. Proposed Changes</p>	<p>To strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes these bullet points (the criteria required to satisfy proposals for this type of development) suggested below to ensure any proposed development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors.</p> <ul style="list-style-type: none"> • <i>'Development avoids areas of high flood risk and adheres to the requirements of PPG and NPPF and if required provide a Flood Risk Assessment, in accordance with Policy SP6</i> • <i>Development will address all environmental concerns/constraints such as wastewater drainage, to ensure the development is sustainable.'</i>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	We wish to attend the examination for an opportunity to explain the need to include the suggested wording to ensure these types of developments are not at risk of flooding and would not have a negative impact on sensitive receptors.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy DM 27 Sub-division of Existing Dwellings in the Countryside

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1782
Chapter / Policy / Appendix Number	Policy DM 27
Chapter / Policy / Appendix Title	Sub-division of Existing Dwellings in the Countryside
Order	182
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	Englefield Estate cover letter REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Provision for the sub-division of existing dwellings in the countryside will help to further meet the needs of rural communities and boost the overall supply of housing. The introduction of draft LPR Policy DM27 is therefore welcomed. It will be important that a positive approach is taken to considering applications for such schemes in line with paragraphs 38, 78 and 79 of the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Policy DM 28 Residential Extensions

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1464
Chapter / Policy / Appendix Number	Policy DM 28
Chapter / Policy / Appendix Title	Residential Extensions
Order	183
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	Support policies
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Environment Agency
<p>Consultee Full Name</p>	Judith Montford
<p>Consultee Organisation</p>	Environment Agency
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1565
<p>Chapter / Policy / Appendix Number</p>	Policy DM 28
<p>Chapter / Policy / Appendix Title</p>	Residential Extensions
<p>Order</p>	183
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail

Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	We have reviewed Policy DM28-Residential Extensions and to strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed development is not at risk of flood risk and would not cause any detrimental impact to sensitive receptors. See the suggested wording in section 4.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.
4. Proposed Changes	To strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes these bullet points (the criteria required to satisfy proposals for this type of development)

	<p>suggested below to ensure any proposed residential extensions is not at risk of flooding and would not cause any detrimental impact to sensitive receptors.</p> <ul style="list-style-type: none"> • <u>'Development avoids areas of high flood risk and adheres to the requirements of PPG and NPPF and if required provide a Flood Risk Assessment, in accordance with Policy SP6</u> • <u>Development will address all environmental concerns/constraints such as wastewater drainage, to ensure the development is sustainable.'</u>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	We wish to attend the examination for an opportunity to explain the need to include the suggested wording to ensure these types of developments are not at risk of flooding and would not have a negative impact on sensitive receptors.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Policy DM 29 Residential Annexes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1465
Chapter / Policy / Appendix Number	Policy DM 29
Chapter / Policy / Appendix Title	Residential Annexes
Order	184
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1566
Chapter / Policy / Appendix Number	Policy DM 29
Chapter / Policy / Appendix Title	Residential Annexes
Order	184
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	We have reviewed Policy DM29 - Residential Annexes and to strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors. See the suggested wording in section 4.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.
4. Proposed Changes	To strengthen this policy to ensure that it adheres to national policy, we ask that it includes these bullet points (the criteria required to satisfy proposals for this type of development) suggested below to ensure

	<p>any proposed development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors.</p> <ul style="list-style-type: none"> • <i>'Development avoids areas of high flood risk and adheres to the requirements of PPG and NPPF and if required provide a Flood Risk Assessment, in accordance with Policy SP6</i> • <i>Development will not result in any detrimental impact on sensitive receptors. The development will satisfactorily address all environmental issues such as wastewater drainage, to ensure the sustainability of the development.'</i>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	We wish to attend the examination for an opportunity to explain the need to include the suggested wording to ensure these types of developments are not at risk of flooding and would not have a negative impact on sensitive receptors.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy DM 30 Residential Space Standards

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS203
Chapter / Policy / Appendix Number	Policy DM 30
Chapter / Policy / Appendix Title	Residential Space Standards
Order	185
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We do not support the introduction of nationally described space standards for market housing. The size of market units should be determined by market preferences and the location of the site rather than stipulated unit sizes across the whole District. The requirement for market housing to be designed to these standards can also result in additional build costs due which may cause some developments to become unviable. We therefore suggest that Policy DM30 is amended to apply to affordable dwellings only.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We therefore suggest that Policy DM30 is amended to apply to affordable dwellings only.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Purley on Thames Parish Council
Consultee Full Name	Christopher Thompson
Consultee Organisation	Purley on Thames Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS514
Chapter / Policy / Appendix Number	Policy DM 30
Chapter / Policy / Appendix Title	Residential Space Standards
Order	185
Submission Type * E-Mail	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	After a revised period, consultation was advised
4. Proposed Changes	None - we would ask the planning authority to take into account the attached observations

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1332
Chapter / Policy / Appendix Number	Policy DM 30
Chapter / Policy / Appendix Title	Residential Space Standards
Order	185
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	Object. The policy wording is not effective.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Proposed amendment. The policy should be deleted.</p> <p>The policy should be deleted unless the Council have clear evidence that the requirements of the policy to deliver all new market and affordable dwellings, including from permitted development, change of use and conversion, to nationally described space standards, can realistically be delivered. Bloor Homes Ltd is concerned that the proposed approach may reduce the number of homes delivered and may not represent an efficient or sustainable use of land. Consequently, the policy is not deliverable or effective and renders the plan unsound.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	Yes. To explain the implications of the policy as currently worded.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	Yes

* Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1694
Chapter / Policy / Appendix Number	Policy DM 30
Chapter / Policy / Appendix Title	Residential Space Standards
Order	185
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Policy is unsound as it has not been justified. This policy will require all new residential development to meet the nationally described space standards. As the Council will be aware in order to adopt these standards the Council must show that there is a need for such homes within the Borough, but we could not find the evidence referred to in paragraph 11.105 of the Local Plan. If the Council cannot provide sufficient evidence to support the adoption of these standards, then this policy should be deleted.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1466
Chapter / Policy / Appendix Number	Policy DM 30

Chapter / Policy / Appendix Title	Residential Space Standards
Order	185
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS204
Chapter / Policy / Appendix Number	Policy DM 31
Chapter / Policy / Appendix Title	Residential Amenity
Order	186
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>In regard to the requirements for new residential developments, we do not support the requirement set out in point iv which stipulates a garden size of at least a minimum of 10.5 metres in depth, where possible. We are of the view that garden sizes should be determined by the size of the associated property, the provision of open spaces on the development site and the provision and proximity of open spaces in the locality rather than a stipulated minimum depth. In addition, the varying design of house types may mean that some dwellings are generally wider units and as a result benefit from wider gardens. Sufficient garden sizes may therefore be achievable with shorter garden depths so it would not be appropriate to apply minimum depths.</p> <p>We therefore suggest that point iv is amended to state that “a garden size which is commensurate with the size of the property, taking into consideration the provision and proximity of on-site and nearby public open space”.</p> <p>In regard to point v, we do not support the requirement for a minimum distance of 21m between habitable room windows for all separation distances. Where this relates to front-to-front relationships, whilst street widths vary depending on the role of the street, the width may typically be circa 9m therefore the 21m requirement could significantly impact site layouts and the character of street scenes. In addition, if this separation distance is applied to a back to side relationship, this could significantly impact site layouts and could result in the inefficient use land, contrary to paragraph 124 of the NPPF.</p> <p>We therefore suggest that point v should be amended to state “a minimum back-to-back distance of 21 metres between directly facing windows, serving habitable rooms, subject to design and layout”.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.</p>
<p>4. Proposed Changes</p>	<p>We therefore suggest that point iv is amended to state that “a garden size which is commensurate with the size of the property, taking into consideration the provision and proximity of on-site and nearby public open space”.</p> <p>We therefore suggest that point v should be amended to state “a minimum back-to-back distance of 21 metres between directly facing windows, serving habitable rooms, subject to design and layout”.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	<p>N/A</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Feltham Properties (Represented by Pro Vision)</p>

Consultee Full Name	Sean Bates
Consultee Organisation	Feltham Properties
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS757
Chapter / Policy / Appendix Number	Policy DM 31
Chapter / Policy / Appendix Title	Residential Amenity
Order	186
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:19:54
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The policy is supported in general but should allow for local context to influence the size of gardens and separation between properties, such that it focuses on achieving good design outcomes for the location and not dictated by inflexible design parameters.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Modify the policy to include the words <i>“Achieving good design outcomes is the priority, so where local circumstances and/or design proposals justify it, some variation in these design requirements will be supported”</i> .
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Feltham Properties is a reputable local development company and has an interest in ensuring that the development management policy is appropriate and not a barrier to sustainable development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Churchill Retirement Living Ltd (Represented by Planning Issues Ltd)
Consultee Full Name	Churchill Retirement Living Ltd
Consultee Organisation	Churchill Retirement Living Ltd
Agent Full Name	Ziyad Thomas
Agent Organisation	Planning Issues Ltd
Comment ID	PS957
Chapter / Policy / Appendix Number	Policy DM 31
Chapter / Policy / Appendix Title	Residential Amenity
Order	186
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail

Response Date	03/03/2023 16:19:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>Policy DM31 details a set of standards for new residential developments to ensure a high standard of amenity for existing and future users of land. Requirements for new residential developments are set out in sub-clauses i) to v).</p> <p>The respondent is concerned about sub-clause iv) which requires '<i>a garden size which is at least a minimum of 705 metres in depth, where possible</i>' and, more generally, guidance on external requirements for outdoor amenity space in the supporting text.</p> <p>Local Plan's that incorporate policies that impose generic design standards for external amenity space on Specialist Older Persons' Housing are problematic as they rarely consider the specific needs of the intended residents (typically a 79-year old widow) and disregard the expertise of specialist providers in delivering these types of development.</p> <p>Housing designed for a range of potential occupiers, in particular families require a greater amount of outdoor space to accommodate space for children's play, space for light exercise and socialising. This is not however the case for retirement living apartments and other forms of specialist housing more generally.</p> <p>Successful retirement living developments do not require large areas of external amenity space, as garden areas tend to be used for passive recreation and visual amenity A smaller quantum of high-quality external amenity space, in conjunction with the internal communal facilities, is better suited to meet the needs of the intended residents.</p>

	We would therefore respectfully request that more flexibility on external amenity space standards is provided for specialist forms of residential development (such as specialist older persons' housing/ student housing etc.).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Liberal Democrats
Consultee Full Name	Councillor Dr Tony Vickers
Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1284
Chapter / Policy / Appendix Number	Policy DM 31
Chapter / Policy / Appendix Title	Residential Amenity
Order	186
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>In an urban setting, where residential development is within a short distance of public open space, the need to achieve wider sustainability policy objectives can mean that to insist on a minimum length or area of private amenity space, irrespective of the functional needs of future occupants, is not always justified.</p> <p>What matters, is whether the occupants have access to the benefits that come from outdoor exercise and the natural environment, with all the health benefits it brings and with the added advantage that access to public open space of makes social contact easier and leads to a more vibrant local community.</p> <p>This particularly applies to urban settings with their advantages of easy access to other facilities by means of active travel: schools, shops, hospitality venues, etc.</p> <p>By removing any requirement for a specific size of private outdoor amenity space, other than for functions such as hanging out the washing, spaces for growing salads or flowers, or generally personalising that space within reasonable limits, planning policy will enable more effective use of high value urban land and therefore promote more sustainable urban communities, where residents care more for their shared outdoor spaces than for private gardens that many neglect and may find a burden to maintain.</p> <p>The proposed change of policy here will increase choice for some households want a house for their small family but who would otherwise be denied access to decent sustainable living space with any totally private outdoor amenity space, in soulless blocks of flats.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>N/A</p>

4. Proposed Changes	Delete "iv" in DM31 and renumber 'v' as 'iv'. Add new 11.110 after 11.109 and re-number: "Proposals to provide shared private space between neighbouring dwellings within a new development will be considered if they can demonstrate outcomes more likely than not to improve neighbourly relations. However a clear distinction will need to be made between such private space for the development's residents only and public open space available to all." Add after existing 11.113 new paragraph and re-number: "In urban settings near public parks or high quality public open spaces (such as a canal towpath or riverside right of way), a reduction in private amenity space standards may be acceptable if access to those public spaces is within 5 minutes on foot."
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I wish to provide evidence of public and academic support for these changes.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1467
Chapter / Policy / Appendix Number	Policy DM 31
Chapter / Policy / Appendix Title	Residential Amenity
Order	186
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	Object to "where possible" in point (iv). This would provide a "get out" for developers that would undermine the policy. Gardens should always conform to the minimum length of 10.5 metres. Otherwise, policy is supported
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	"where possible" should be removed from point (iv)
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 32 Designated Employment Areas

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS174
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>It is inferred from the text that the Council plans the use of DEA's to restrain the currently malign use of Permitted Development Rights to convert business premises to residential use in disregard of local plans. If correct, that intention is strongly supported.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Walker Logistics Ltd (Represented by Pegasus Planning Group Ltd)</p>
<p>Consultee Full Name</p>	<p>Philip Walker</p>
<p>Consultee Organisation</p>	<p>Walker Logistics Ltd</p>
<p>Agent Full Name</p>	<p>Jim Tarzey</p>
<p>Agent Organisation</p>	<p>Pegasus Planning Group Ltd</p>
<p>Comment ID</p>	<p>PS414</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 32</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Designated Employment Areas</p>
<p>Order</p>	<p>188</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	<p>E-Mail</p>

* Web * Unknown	
Response Date	01/03/2023 12:45:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>As explained above, we agree with the proposal to extend the DEA at Membury Estate. It is the correct approach to extend existing DEAs. Such extensions ensure efficiencies are maximised and that development is best or properly integrated with functioning employment areas.</p> <p>However, the DEA should (at a minimum) be extended to reflect the boundary of the ESA2 site allocation. As drawn, it removes the eastern part of the site allocation.</p> <p>It is also appropriate to further extend the DEA to include the whole of the site being promoted by Walkers, including the airfield runway. In addition, we consider that the existing Walker Logistics complex (to the south), which comprises employment floorspace, should be included in the DEA.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	B Y M Capital Ltd (Represented by Lichfields)
Consultee Full Name	Dean Jordan
Consultee Organisation	B Y M Capital Ltd
Agent Full Name	Amy Lomath
Agent Organisation	Lichfields
Comment ID	PS416
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:10:00
Attached Files	PS416 Lichfields (BYM Capital) photos.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>We write on behalf of our client, BYM Capital, who welcomes the opportunity to engage with West Berkshire Council (WBC) on the Local Plan Review. This letter comprises BYM Capital's representations to the Proposed Submission (Regulation 19) West Berkshire Local Plan Review 2022-2039 consultation, specifically in relation to its land holdings at Overbridge Square, Hambridge Lane, Newbury, RG14.</p> <p>The Overbridge Square site comprises five buildings: Leat House, Wier House, Bridge House, Lock House and Mill House (see plan at Annex 1). The site also contains an underutilised car park located off Hambridge Lane, adjacent to the Overbridge Square residential development. The five existing buildings were converted from office to residential use via Permitted Development Rights (PDR) in 2016. The buildings are occupied and therefore the site has an established residential use and character.</p> <p>Representations - Policy DM32 Designated Employment Areas</p> <p>Throughout the Local Plan Review, areas previously known as Protected Employment Areas (PEAs) are renamed Designated Employment Areas (DEAs). Draft Policy DM32 states that DEAs 'are specific locations designated for business uses (office, industry, storage, distribution). These areas are safeguarded for such uses and for the role they play in meeting the future economic needs of the District.'</p> <p>As defined by the Regulation 19 Policies Map, the entire Overbridge Square site is designated within a wider DEA known as Hambridge Road/Lane (see extract at Annex 2). Considering that all five buildings located at Overbridge Square are in established residential use, the land is no longer considered a suitable part of a DEA designation.</p> <p>Draft Policy DM32 seeks to safeguard employment land, however, there is no longer any existing office (or other employment) use at the Overbridge Square site, and this is unlikely to change within the Plan period, given the residential leases within the existing buildings.</p> <p>In light of the above, BYM Capital object to the extent of the Hambridge Road/Lane DEA designation as it is not justified and, therefore, it fails the soundness test. To remedy this objection, BYM Capital request that the land comprising the Overbridge Square site, shown at Annex 1, is removed from the Hambridge Road/Lane DEA designation.</p> <p>This approach would be consistent with changes already proposed to DEA's elsewhere in West Berkshire, for example at Newbury Business Park:</p> <ul style="list-style-type: none"> • Emerald House, Newbury Business Park, London Road: PDR approval on 8th May 2018 for the change of use from offices (B1a) to 138 residential units (C3). This site was consequently removed from DEA through the Local Plan Review. • Lambourn House, Derby House and Nexus House, Newbury Business Park, London Road: PDR approval on 15th May 2017 for the conversion of Lambourn House, Derby House and Nexus House into 129 x 1 bed flats (C3). This site was consequently removed as DEA land through the Local Plan Review.

	<p>These sites have been removed from DEA designations due to their residential use. BYM Capital requests that this approach is appropriate for the Overbridge Square site in Newbury.</p> <p>Concluding Remarks</p> <p>The existing use of the Overbridge Square site is residential. It does comprise any employment uses, and hence, its inclusion within a proposed Designated Employment Area is not justified nor appropriate. We request that the site be removed from the DEA designation, as has been the case with other comparable residential sites in the District.</p> <p>We reserve the right to appear at the Local Plan Review Examination in Public should our objection not be suitably addressed by WBC.</p> <p><i>See attachments for photos.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	We reserve the right to appear at the Local Plan Review Examination in Public should our objection not be suitably addressed by WBC.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Union4 Planning Ltd
Consultee Full Name	Jonathan Rowlatt
Consultee Organisation	Union4 Planning Ltd
Agent Full Name	Jonathan Rowlatt
Agent Organisation	
Comment ID	PS653
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
<p>Submission Type * E-Mail * Letter * Other * SMS</p>	Web

* Web * Unknown	
Response Date	03/03/2023 11:32:35
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	It is considered that the local plan has been prepared in accordance with the relevant European, national and local policy context
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Protection of employment sites, as set out in policy DM32, is strongly supported. The location of office development towards accessible centres is also supported and proposals for the redevelopment of redundant office stock within employment areas should consider this to ensure the optimum use and employment provision on suitable sites.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a	No

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	West Berkshire Council as landowner
Consultee Full Name	Sam Robins
Consultee Organisation	West Berkshire Council as landowner
Agent Full Name	
Agent Organisation	
Comment ID	PS693
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 13:16:44
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>If not included in supporting text for SP21 as proposed above, propose including instead in the supporting text of DM32, with the wording below, to align with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at https://info.westberks.gov.uk/lrie:</p> <p>12.11 In addition, the London Road Industrial Estate has scope for intensification of employment use within the plan period to maximise the potential of the site. Some mixed use development may be appropriate, provided that no net loss of employment floorspace results from that development.</p> <p>12.12 The Council-owned London Road Industrial Estate (LRIE) currently has an estimated 23,000 sqm of employment space (Avison Young Development Brief 2020) occupied by 36 businesses that employ about 300 people. Following a review taking into account evolving economic drivers, market demand and the district's ambition to be carbon neutral by 2030, a revised Delivery Strategy for LRIE approved by Executive on 9/6/22 aims to increase employment floorspace on the site by at least 30%, safeguard 300 jobs and create at least 200 new jobs by 2030.</p> <p>12.13 The Council as freeholder will work with leaseholders to deliver environmental enhancements on the site including on carbon net zero, nutrient neutrality, sustainable drainage and biodiversity net gain. Further details to be set out in an LRIE Place-making Strategy which will be submitted as a Supplementary Planning Document in due course and progressed through the statutory planning process in parallel with the Local Plan Review.</p> <p>12.14 The Council as landowner is promoting alternative provision outside the LRIE to mitigate the loss of the playing field. This approach is supported by Sport England and aligns with the Council's Playing Pitch Strategy. The exact location of the alternative provision will be determined at the point at which a planning application for redevelopment of the playing field is submitted, accepting that it is for the statutory planning process to determine whether or not redevelopment of the former football ground should be permitted.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes	Yes

* No	
5. Independent Examination	To present the rationale for the proposal
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Community Football Club (Represented by DPDS Consulting Group)
Consultee Full Name	Newbury Community Football Club
Consultee Organisation	Newbury Community Football Club
Agent Full Name	Les Durrant
Agent Organisation	DPDS Ltd
Comment ID	PS908
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The policies do not follow national advice
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	The policy states that “The redevelopment and regeneration of land within DEAs to provide additional business development that meets the needs of the District will be supported”. In light of the Refresh report on the regeneration of the LRIE including the Faraday Road football ground as an area for redevelopment despite it not being part of the DEA, this policy should provide greater clarity on the approach to land on the periphery of DEAs.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Furthermore, it is proposed that the following be added to the policy: “Redevelopment and regeneration of land within DEAs should still seek to protect and/or enhance green infrastructure and community facilities where possible, including in the DEA’s immediate surroundings”.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lesimar Ltd (Represented by DHA Planning)
Consultee Full Name	Lesimar Ltd
Consultee Organisation	
Agent Full Name	John Collins
Agent Organisation	D H A Planning Ltd
Comment ID	PS1233
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:50:00
Attached Files	PS1233 DHA Planning (Lesimar) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We do not foresee any legal compliance issues
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>It is clear that 'policy DM32 – Designated Employment Areas', as referred to in Appendix 4 (Paices Hill/Youngs Industrial Estate) of the West Berkshire Local Plan Review 2022-2039, does not provide an accurate reflection of the potential employment area which could be included within the designation.</p> <p>As per application reference 20/02527/OUTMAJ ('the extant permission'), Decision Notice attached as Appendix 2 and Location Plan attached as Appendix 3, it is clear that the land to the south of Paices Hill/Youngs Industrial Estate ('our client's site') has been granted outline permission for:</p> <p>'the construction of an industrial estate to comprise up to 15,917 sqm of flexible commercial floorspace for B8 (Storage or distribution), Former B1 (c) now Class E (Commercial, Business and Service Use) and B2 (General Industry) with associated access, parking, infrastructure and landscaping. Matters to be considered: Access.'</p> <p>As such, we consider that our clients site represents a logical expansion to the designated employment area given its outline permission. With this in mind, we consider that the existing designation should be extended to include the extant permission area at Blacks Lake Track Racing, Blacks Lake, Paices Hill, Aldermaston, Reading, RG7 4PG.</p> <p>For the reasons as described above, we do not consider that the plan is positively prepared (as it does not seek to meet the area's objectively assessed need in terms of economic growth and management), nor is it justified (does not considered the extant permission) or consistent with national policy (does not seek to support economic growth and productivity, taking into account both local business needs and wider opportunities for development in line with para 81).</p> <p>Attachment: Appendix 1 and 2</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We do not foresee any Duty to Co-operate issues
4. Proposed Changes	<p>We consider that our client's site at 'Blacks Lake Track Racing, Blacks Lake, Paices Hill, Aldermaston, Reading, RG7 4PG', which comprises the extant permission (Decision Notice attached as Appendix 2), should be included as part of/ an extension to the employment designation at Paices Hill/Youngs Industrial Estate.</p> <p>This would result in a natural extension of the designated employment area and given it comprises outline planning permission for industrial uses, would be a logical extension to this designation. We therefore consider that the site should be given have weight in terms of 'policy DM32 – Designated Employment Areas' of the West Berkshire Local Plan Review 2022-2039.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Should the Inspector consider it necessary for us to further justify the expansion of the designated employment area, we would be happy to participate at the examination hearing session.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wokingham Borough Council
Consultee Full Name	Wokingham Borough Council
Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1485
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comments.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>Wokingham Borough Council (WBC) notes that West Berkshire District Council's (WBDC) employment evidence identifies a need for 50,816sqm of office floorspace and a combined 91,109sqm industrial, storage and distribution floorspace over the plan period. Policy SP20 details the strategic approach to addressing economic development needs, Policy SP21 sets out a number of site allocations for industrial land, and Policy DM32 identifies Designated Employment Areas where businesses uses are to be safeguarded. No allocations are made in the Plan for additional office floorspace.</p> <p>The Plan supports the redevelopment and regeneration of existing employment sites. It therefore retains, and identifies new, employment sites which can be intensified to meet some of its identified needs. New allocations for industrial use are anticipated to provide 58,400sqm. However, this is insufficient to meet the full identified needs for industrial land, resulting in a shortfall of 32,709sqm industrial floorspace. There are no estimates provided of how much floorspace the wider policy approach might deliver, and no specific land is identified to provide for office use. As a result, the full identified office need of 50,816sqm remains unmet. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs.</p> <p>Like WBDC, WBC has commissioned a new Employment Land Needs Review, to better understand future economic needs, for both office and industrial/warehousing. The key emerging finding of the report is an increased need for industrial/warehousing floorspace across Wokingham Borough, which reflects changes in both the local and sub-regional economy. The report suggests there is no need for additional office floorspace.</p> <p>Work is ongoing to assess the availability, suitability and deliverability of land promoted for economic uses within Wokingham Borough, as part of the Housing and Economic Land Availability Assessment (HELAA), which will help to inform whether these economic needs can be met. However, given the scale of the need for new industrial/warehousing floorspace arising in Wokingham Borough and the small number of sites promoted for economic uses, at this stage WBC confirms that it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated. Indeed, WBC cannot guarantee meeting the need arising from Wokingham Borough.</p> <p>WBC recognise and support WBDC's ongoing recognition of the arising employment needs and the attempts to reach agreement with other authorities. WBC requests continued engagement with WBDC on this matter as part of the duty to cooperate.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	WBC notes that separate duty to co-operate discussions are ongoing between the two authorities. WBC welcomes these discussions progressing
4. Proposed Changes	N/A
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Valley Chamber of Commerce (Represented by DPDS Consulting Group Ltd)
Consultee Full Name	Mr Paul Britton
Consultee Organisation	Thames Valley Chamber of Commerce
Agent Full Name	Ms Mandy Wetherell
Agent Organisation	DPDS Consulting Group Ltd
Comment ID	PS1620
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:22:00
Attached Files	DPDS obo TVCC_attachment_full rep_redacted
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><See attached report for full representation - DPDS obo TVCC_attachment_full rep_redacted> DM32 Designated Employment Areas</p> <p>The Chamber supports the general ambition of Policy DM32 in so far as it seeks to support and expand business in West Berkshire. The Chamber also supports redevelopment and regeneration of land within DEAs to provide additional business development where it is needed, including the statement in supporting text paragraph 12.7 that this is to be supported to attract inward investment.</p> <p>However, in line with previous representations on Policy SP20, the Chamber believes that this policy could go even further in setting out a positive strategy for the future of the Designated Employment Areas which would guarantee appropriate development or redevelopment and help ensure the best conditions for attracting inwards investment are created.</p> <p>Therefore, the Chamber would like to reiterate earlier comments that a development-plan and SEA led framework of positive, criteria-led site specific policies for each Designated Employment Area should be included within the Local Plan.</p> <p>Conclusion</p> <p>These representations have outlined West Berkshire Chamber of Commerce's concerns as to the soundness of the Local Plan preparation process. The primary concern of WBCC is that the proposed policies regarding designated employment areas, in particular SP20 as exemplified by the Council's approach to LRIE, are unsound and do not go far enough to ensure that the development or redevelopment of DEAs across the district is sustainable and creates the best conditions for attracting inward investment. This is as well as the policies potentially not being appropriately justified. As they are, the policies run the risk of enabling piecemeal development at Designated Employment Areas which would result in a lower quality of land available for business use as well as potentially resulting in vital environmental investigation not being able to take place.</p> <p>As such, various modifications have been proposed to ensure the soundness of the Local Plan. Most importantly, a development-plan and SEA led framework of criteria-based site specific policies for each DEA should be adopted which would guarantee that development or redevelopment is sustainable and can create the best conditions for inwards investment and regeneration. There have also been several wider minor comments and representations on other policies throughout the Local Plan.</p> <p>To conclude, these representations have concluded that the Proposed Local Plan is potentially unsound and we therefore respectfully request that the sentiments of these representations be fully considered and reflected in further Modification to the submitted Local Plan.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	We believe it is necessary as we are proposing significant modifications and the content of our representations is important.

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS1783
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	Englefield Estate cover letter REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	Yes

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Draft LPR Policy DM32 states that proposals for employment uses will continue to be focused within DEAs. Whilst this is a logical and sustainable approach, it is important to ensure that this is balanced with supporting the needs of the rural economy as set out at draft LPR Policy DM35 and other existing employment sites. The NPPF sets out a positive approach towards supporting the rural economy and is clear that planning policies should enable 'the sustainable growth and expansion of all types of business in rural areas' (paragraph 83). It is therefore important that the LPR does not restrict rural employment development in rural areas and that draft LPR Policies DM32 and DM35 are applied together.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1468
Chapter / Policy / Appendix Number	Policy DM 32
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	188
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? -	No

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Office developments in DEAs should be subject to the sequential test</p> <p><i>Para 12.7</i> The statement that “the redevelopment and regeneration of land within DEAs to provide additional business development that meets the needs of the District will be supported” is not restrictive. It is likely to lead to the loss of employment, particularly “blue collar” within DEAs.</p> <p><i>Para 12.9</i> Office developments in DEAs should be subject the sequential test</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The sentence “New office proposals located within a DEA will not be required to satisfy the sequential test” should be removed from the policy</p> <p>Section 12.7 should be removed.</p> <p>The last sentence of section 12.9 should be removed</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Nuleaf (Nuclear Legacy Advisory Forum)
Consultee Full Name	Mr Philip Matthews
Consultee Organisation	Nuleaf (Nuclear Legacy Advisory Forum)
Agent Full Name	
Agent Organisation	
Comment ID	PS397
Chapter / Policy / Appendix Number	Policy DM 33
Chapter / Policy / Appendix Title	Development within AWE
Order	189
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 11:39:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Nuleaf (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on nuclear legacy wastes and decommissioning. We are directly supported by over 100 local authorities and national park authorities across England and Wales and speak for the wider LGA. West Berkshire Council is a member of Nuleaf, though this submission has been prepared without any engagement with representatives of the local authority.</p> <p>Nuleaf's remit encompasses all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:</p> <ul style="list-style-type: none"> • to provide a mechanism to identify, where possible, a common local government viewpoint on nuclear legacy management issues; • to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including the Welsh and UK Government, the Nuclear Decommissioning Authority (NDA) and the regulators; • to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and • to develop the capacity of its member authorities to engage with nuclear legacy management at a local level. <p>Our Radioactive Waste Planning Group is an expert forum for senior land-use and waste planning officers, which aims to support the development of Local Plans and Minerals and Waste Plans. Nuleaf advocates that all Local Plans and Minerals and Waste Plans, particularly those covering areas which include parts of the UK's nuclear infrastructure, should have policies on decommissioning and radioactive waste management. More information on our suggested approach is set out in our Briefing Paper 11: Approaches to Radioactive Waste Management in Local Plans.1</p> <p>The absence of clear policies leaves local authorities and communities less able to influence proposals for the disposal, storage, management or transportation of radioactive materials within their area. We therefore welcome the inclusion of Policy DM33 on Development within AWE, covering the Aldermaston and Burghfield sites. This policy is primarily aimed at facilitating appropriate development within the two sites.</p> <p>We also note that the West Berkshire Minerals and Waste Local Plan 2022-37 (M&WP) includes Policy 13 that covers the management of all relevant categories of radioactive waste and requires that a need is proven before the development of any new waste facilities is permitted.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We would propose that DM33 is amended to reference Policy 13 of the M&WP i.e. that any new development at the AWE sites which has implications for radioactive waste management should have to demonstrate need and be based primarily in managing waste that has arisen locally.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stratfield Mortimer Parish Council
Consultee Full Name	Lynn Hannawin
Consultee Organisation	Stratfield Mortimer Parish Council
Agent Full Name	Lynn Hannawin
Agent Organisation	
Comment ID	PS611
Chapter / Policy / Appendix Number	Policy DM 33
Chapter / Policy / Appendix Title	Development within AWE
Order	189
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 10:50:56
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	West Berkshire Council is already informed about major development plans at AWE which will impact local roads, businesses, accommodation and services but this is not referred to or taken account of in the LP
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1197
Chapter / Policy / Appendix Number	Policy DM 33
Chapter / Policy / Appendix Title	Development within AWE

Order	189
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	AWE supports the inclusion of this policy which continues the express policy support for development at Aldermaston (AWE A) and in Burghfield (AWE B). This will enable AWE efficiently to develop, modernise, rationalise and consolidate its estate footprints in accordance with the Government's investment programme, which responds to the Government's policy commitment to UK's defence and security needs. AWE's land use requirements and aspirations for AWE A and AWE B are dynamic, reflecting the mix of buildings and uses on the sites and the Government's investment programme which is focussed, inter alia, on enhancing the sites' science, research and development capabilities together with related production facilities. The Policy is in accordance with Paragraphs 20 (b), 97 (b) and 187 of the NPPF in terms of a strategic policy which sustains, protects and promotes the established strategic uses at the two sites and their important national security and local employment functions.

	<p><i>Para 12.13</i></p> <p>AWE is broadly supportive of this paragraph but this should also refer to other enabling works in connection with the development and uses covered under Policy DM33.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>Para 12.12</i></p> <p>In accordance with the representation made against Para 4.37, AWE requests an amendment to the paragraph in order to align with the NPPF reference and also provide consistency through the Local Plan as to how the function of the sites is explained</p> <p>“Both AWE sites as Government research and defence establishments are core to sustaining the UK Government’s national defence and security and in particular the delivery of the warhead contribution to the national and international nuclear deterrent.”</p> <p><i>Para 12.13</i></p> <p>Suggested text</p> <p>“Planning permissions should also positively consider any enabling works and/or the temporary use of land needed in connection with site optimisation and phased delivery of the development”</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Defence Infrastructure Organisation
<p>Consultee Full Name</p>	Paul Hinton
<p>Consultee Organisation</p>	Defence Infrastructure Organisation
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1352
<p>Chapter / Policy / Appendix Number</p>	Policy DM 33
<p>Chapter / Policy / Appendix Title</p>	Development within AWE
<p>Order</p>	189
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 15:19:00
Attached Files	Denison Barracks site plan.pdf RAF Welford site plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Please find set out below specific representations submitted on behalf of the Secretary of State for Defence on the consultation. Please note that these comments should be read in addition to those to be provided by colleagues in respect of MOD Safeguarding interests. The comments set out below relate to wider MOD estate related interests.</p> <p>1. Background</p> <p>1.1 The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD) welcomes the opportunity to comment on the West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation. The DIO is the estate expert for defence, supporting the armed forces to enable military capability by planning, building, maintaining, and servicing infrastructure on behalf of the MOD.</p> <p>1.2 The MOD has significant land interests within the area covered by West Berkshire, including both of the Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield, Denison Barracks and RAF Welford. These are important operational defence sites with an enduring requirement to support national defence outputs.</p>

2 National Planning Policy Framework

2.1 The Council will be aware of the requirements of paragraphs 97 and 187 of the National Planning Policy (NPPF) as quoted below:

“97. Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

“187. Planning policies and decisions should ensure... Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.”

3 Representations

3.1 Whilst not directly referencing paragraph 97 of the NPPF paragraph 12.11 of the West Berkshire Local Plan Review 2022-2039 explains that planning policies and decisions should recognise and support development required for operational defence and security purposes. This paragraph forms the supporting text for proposed policy DM33.

3.2 Policy DM33 supports development where it directly sustains the functioning of each of the AWE sites as Government research and defence establishments. DIO **supports** this Policy.

3.3 Denison Barracks and RAF Welford are operational defence sites and for the same reasons as DM33, these sites should also have a local plan policy that supports development at these sites where it is required for operational defence and security purposes. Please see enclosed plans of these two sites.

3.4 As currently proposed Policy DM33 of the Local Plan is very helpful to the decision maker when dealing with development proposals that sustains the function of each of the AWE sites. Whereas at Denison Barracks and RAF Welford the decision maker would have before them a defence related policy but would be unable to afford it weight as it directly relates to two different establishments, albeit establishments that also fall within the description of paragraph 97 of the NPPF and with the same purpose to provide defence outputs.

3.5 Paragraph 16d) of the NPPF sets out that Plans should ‘contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’. We contend that whilst the principle of Policy DM33 is correct, the absence of a similar policy does not assist the decision maker when it comes to making decisions for any future planning applications for developments at both Denison Barracks and RAF Welford.

3.6 To ensure that it is clear to the decision maker how to react to development proposals at Denison Barracks and RAF Welford, and for consistency with the approach the Plan takes for the other two defence sites at Aldermaston and Burghfield, DIO requests that an additional policy for these two sites is also included in the Local Plan.

3.7 Paragraph 4.41 of the West Berkshire Local Plan Review 2022-2039 quite rightly quotes parts of paragraphs 97 and 187 of the NPPF in regard to the need to protect the ongoing day-to-day needs of defence sites, and to ensure that they are not affected adversely by the impact of other development proposed in the area, and to ensure that unreasonable restrictions are not placed on them as a result of development permitted after they were established.

3.8 These paragraphs support the provision of policy SP4 (Atomic Weapons Establishment Aldermaston and Atomic Weapons Establishment Burghfield) whose purpose is, amongst other considerations, to prevent developments that pose an external hazard to the AWE sites. While Denison Barracks and RAF Welford do not have a defined Detailed Emergency Planning Zone (DEPZ) like they do at the AWE sites, they are however, also at risk from third party developments that could affect adversely the operations of these sites and place unreasonable restrictions on them contrary to paragraphs 97 and 187 of the NPPF. For the same reasons as paragraph 4.41 and the purpose of policy SP4 the Plan should also include a policy that protects the day-to-day needs of Denison Barracks and RAF Welford.

3.9 As explained above, for consistency in decision making, all defence related sites must be treated in the same way. While we recognise policy SP4 is specific to the DEPZ and therefore including Denison Barracks and RAF Welford within this Policy would be ambiguous, a sentence could be included within a specific new Policy for these two sites within the Plan. This should include provision that non-defence related development in the areas around a defence site will not be supported where it would adversely affect defence related operation or capability.

4 Conclusion

4.1 DIO is supportive of the principle of policy DM33 which recognises the important land use role of defence establishments but has significant concerns that the Plan is not covering wider MOD interests and therefore is ambiguous by focusing on only two of the four defence sites within Plan area. Whilst we appreciate the particular consideration of AWE given the operations carried out at Aldermaston and Burghfield the Plan as currently written is inconsistent by providing support for future operational developments at the two AWE sites but is unclear to the decision maker on how to consider defence related activity and capability development proposals at Denison Barracks and RAF Welford in a fair and consistent way. Neither does the Plan make provision to protect Denison Barracks and RAF Welford from third party development proposals in the same way as it does for the two AWE sites.

4.2 Accordingly, as currently written the West Berkshire Local Plan Review would fail to meet the criteria of paragraph 16 of the NPPF.

[See attachments Denison Barracks site plan and RAF Welford site plan]

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>3.10 With the above in mind and for the avoidance of doubt DIO considers that the following Policy should be included within the submission version of the Plan: Development within and effecting Denison Barracks and RAF Welford a) Development within Denison Barracks and RAF Welford will be supported where it directly sustains the functioning of these defence establishments. b) Non-defence related development in the areas around a defence site will not be supported where it would adversely affect defence related operation or capability.</p> <p>3.11 DIO also considers that the following text would be suitable to support the above recommended Policy: Denison Barracks and RAF Welford provide important outputs that support national defence activities. The NPPF outlines that planning policies and decisions should recognise and support development required for operational defence and security purposes, ensuring that operational sites are not affected adversely by the impact of other development proposed in the area and existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.</p> <p>4.3 The inclusion of DIO's recommended policy in addition to Policies SP4 and DM33 would enable the decision maker to consistently and fairly apply the following principles across all defence sites within the Plan area in accordance with paragraphs 97 and 187 of the NPPF by: - recognising and supporting development required for operational defence and security purposes, - ensuring that operational sites are not affected adversely by the impact of other development proposed in the area, and - ensuring unreasonable restrictions are not placed on them as a result of development permitted after they were established.</p> <p>4.4 Incorporation of this Policy, in addition to Policies SP4 and DM33 for AWE would ensure that for defence requirements the Plan would contain policies that are clearly written and unambiguous and which are evident to the decision maker how to react to development proposals for all defence establishments within the Plan area in accordance with Paragraph 16d) of the NPPF.</p> <p>We would be grateful to receive further consultations as the Local Plan progresses and the opportunity to make further comments as necessary.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Whilst we consider soundness can be achieved by way of an additional policy as suggested in our representations, should the Council not recommend such changes we would wish to reserve our right to explain in person our concerns to the Inspector at the forthcoming Examination in Public.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency

Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1858
Chapter / Policy / Appendix Number	Policy DM 33
Chapter / Policy / Appendix Title	Development within AWE
Order	189
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>We have reviewed the policies and site allocations in relation to our remit (flood risk, biodiversity and conservation of fisheries and the water environment, groundwater quality and contaminated land, water quality and water resources) and have provided you with comments below. These comments are not soundness issues but will provide some clarity to the plan.</p> <p>We make no comments or suggest amendments to policies SP4 or DM33 of the draft plan. The Environment Agency is part of an offsite planning group who are consulted by West Berkshire District Council on any development proposals in the Detailed Emergency Planning Zone (DEPZ) of the AWE sites. We have permitted a number of activities and installations within AWE sites under our regulatory requirements and influences and would expect that AWE, or any other organisation undertaking new activities in developments considered under DM33 to consult with us if their activities would require environmental permits.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	

Policy DM 34 Retail Parks

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	F&C Commercial Property Holdings Ltd (Represented by Lichfields)
Consultee Full Name	F&C Commercial Property Holdings
Consultee Organisation	F&C Commercial Property Holdings Ltd
Agent Full Name	Sarah Moorhouse
Agent Organisation	Nathaniel Lichfield & Partners Ltd
Comment ID	PS495
Chapter / Policy / Appendix Number	Policy DM 34
Chapter / Policy / Appendix Title	Retail Parks
Order	192
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 17:25:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Newbury Retail Park, owned by our client, is a successful and currently fully let Retail Park with recent new tenants including Lidl, Pets at Home, Hobbycraft and Deichmann. JD Sports and Cancer Research UK are both opening stores in 2023. A Tim Hortons drive-thru restaurant is also opening in 2023. It is necessary for the owner/our client to take a long term view in relation to the Parks future as the Local Plan runs up to 2039.</p> <p>Draft Policy DM34 seeks to safeguard identified existing retail parks within the District for retail and leisure uses, including Newbury Retail Park. However, it also states that proposals within these areas should either individually, or cumulatively with other such proposals, have no significant detrimental impact on the vitality and viability of Newbury town centre or other nearby centres. The supporting text (para. 12.15) specifically references that any proposals would be subject to the sequential test, where appropriate.</p> <p>The policy, as currently drafted, therefore restricts the future use of the identified retail parks to retail and leisure use (with the supporting text highlighting that the areas perform well and it is important that such locations are safeguarded for retail and leisure uses to ensure the health and diversity of the local economy) but at the same time, it conversely constrains any future expansion/alteration of these locations for further retail and leisure uses without the NPPF retail tests (sequential and impact) being met.</p> <p>Over the Plan period, this constrains future development/redevelopment of the site and does not meet any of the Monitoring Indicators for the Economy and Town Centres set out in Appendix 1. The past 10 to 15 years have seen the retail economy significantly change and the need for flexibility to ensure retail floorspace can be adapted and repurposed as the retail market is dynamic and continues to evolve. The draft policy does not allow for this and is overly stringent.</p> <p>The SA/SEA Environmental Report (Nov 2022), Appendix 6 states that, as worded, the policy is "likely to have a positive impact on access to local services and facilities that are located within retail parks". However, we do not consider this will be the case as the proposed designation and draft policy is overly restrictive, does not support the evolution of retail and leisure uses or allow any flexibility for alternative uses and adaptation to respond to changing shopping patterns and the resulting retail climate.</p> <p>The policy is also based on a historic evidence base (West Berkshire Retail and Commercial Leisure Assessment (WBRCLA) 2016 – now approaching seven years old). The Council's Retail Background Paper (Dec 2022) acknowledges this stating that the Council is committed to a full review of the District's needs in the first five year review of the Local Plan and highlights that this is also because of the changes to retail, locally and nationally since the WBRCLA was published.</p> <p>We therefore consider draft Policy DM34 is not sound as it is neither justified nor is it consistent with national policy. To ensure that the future of the Newbury Retail Park site can be realised (whether it be for continued use as retail or for alternative uses) the policy should therefore be removed from the draft Local Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>If the draft Policy DM34 remains in the Submission Version of the Local Plan, our client would like the opportunity to put forward their case as to why the policy is not sound.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The</p>	<p>Yes</p>

publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS911
Chapter / Policy / Appendix Number	Policy DM 34
Chapter / Policy / Appendix Title	Retail Parks
Order	192
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	No

cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point. Policy DM34 – Retail Parks does not include Town Centre Retail, or Rural Service Centres.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1469

Chapter / Policy / Appendix Number	Policy DM 34
Chapter / Policy / Appendix Title	Retail Parks
Order	192
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The IKEA and Dunelm retail warehouses are not an integral part of the retail park centred on Sainsburys Calcot. IKEA, in particular, is very prominent in the landscape and causes severe traffic congestion at times. Pincents Lane, and its junction with the A4, is not suitable for the volume of traffic attracted by large retail premises. Any future development proposal for the IKEA or Dunelm site should not be for retail.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	"Pincents Lane, Calcot" should be renamed "Calcot Retail Park" and its boundary in the Policies Map should be redrawn to exclude the Dunelm and IKEA sites.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Wokingham Borough Council
Consultee Full Name	Wokingham Borough Council
Consultee Organisation	Wokingham Borough Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1487
Chapter / Policy / Appendix Number	Policy DM 34
Chapter / Policy / Appendix Title	Retail Parks
Order	192
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 08:42:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	<p>Regarding retail, the Plan identifies a hierarchy of centres and designates primary shopping areas. It supports development for town centre uses that contributes to vitality and viability of these centres and provides for changes of use away from retail, only in certain circumstances. The Plan also designates a number of Retail Parks to safeguard retail and leisure uses. It does not identify any specific allocations for retail floorspace.</p> <p>The Plan sets out a commitment to review retail evidence within the first 5 years of the Plan, owing to significant changes brought about by Brexit and COVID19 making it impractical to update its evidence in a meaningful way. WBDC's existing evidence from 2016 (The Western Berkshire Retail and Commercial Leisure Assessment jointly prepared with WBC, RBC, and BFBC) identified a need for 25,600sqm comparison retail floorspace in West Berkshire to 2036. This represents a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC has embarked upon an update to retail and commercial leisure evidence as part of its own emerging Local Plan Update. Given the significant need previously identified, WBC stresses the importance of WBDC's evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	WBC notes that separate duty to co-operate discussions are ongoing between the two authorities. WBC welcomes these discussions progressing
<p>4. Proposed Changes</p>	N/A
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	No

<p>necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	

Policy DM 35 Sustaining a Prosperous Rural Economy

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1156
Chapter / Policy / Appendix Number	Policy DM 35
Chapter / Policy / Appendix Title	Sustaining a Prosperous Rural Economy
Order	193
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>We welcome Policy DM35, which encourages a prosperous rural economy. We support the Council's position to encourage appropriate proposals which make use of previously developed land.</p> <p>However, we hold reservations in relation to point j., which we consider to be inconsistent with the requirements of the NPPF. Para 111 of the NPPF reads as follows:</p> <p><i>Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</i></p> <p>DM35 point j. states that proposed developments should not generate traffic of a type or amount inappropriate for the rural roads which could be detrimental to their character and use. The NPPF is clear in stating that development should only be prevented refused on highway grounds where there is an unacceptable impact on highway safety or the impact on the road network would be severe. Character and use are not referenced within the NPPF and, as such, we consider the DM35 (j) to be inconsistent with national policy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>We therefore recommend that Policy DM35 is revised as detailed below (additions shown <u>underlined</u> deletions shown with a strikethrough).</p> <p>[...]</p> <p>j. It would not generate traffic of a type or amount inappropriate for the rural roads, byways or restricted by ways affected by the proposal or require improvements to these roads, byways, or restricted byways which could be detrimental to their character and use by motorised and non-motorised traffic <u>an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would not be severe.</u></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	The Wasing Estate (Represented by Pro Vision)
<p>Consultee Full Name</p>	The Wasing Estate
<p>Consultee Organisation</p>	The Wasing Estate

Agent Full Name	Sarah Pyne
Agent Organisation	Pro Vision
Comment ID	PS1755
Chapter / Policy / Appendix Number	Policy DM 35
Chapter / Policy / Appendix Title	Sustaining a Prosperous Rural Economy
Order	193
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

<p>Please give reasons for your answer</p>	<p>Draft Policy DM35 encourages development proposals that contribute to sustaining a prosperous rural economy and does allow for proposals for economic development in the countryside, which is supported. However the Estate objects to the proposed amendments to the policy which are considered to be very onerous and conflicting with the aims of national policy:</p> <p>a) The proposals demonstrate that the business can make a long term contribution to the rural economy Criteria (a) is now significantly more onerous than previously drafted and clear guidance is not given as to how this policy criteria may be demonstrated. This will preclude many proposals for economic development from coming forward.</p> <p>d) Where new buildings are proposed the landowner has not disposed of, or converted, any buildings to a residential use in the previous 3 years which could have met the needs of the development proposed The proposed amendments to criteria (d) are unjustified and significantly more onerous, and prejudice businesses that may have had to previously adapt to earlier changes in circumstances. This criteria fails to accord with Paragraph 82(d) of the NPPF that requires planning policies to be flexible and to enable a rapid response to changes in circumstances, enabling conditions in which businesses can invest, expand and adapt.</p> <p>h) New or replacement buildings are located within or adjoining an existing group of buildings and further expansion into the open countryside is avoided This prohibits economic development on any site that does not already have existing buildings or is not already adjoining existing buildings. This approach suggests a presumption against new buildings for economic development, where in fact this is supported under Paragraph 84(a) of the NPPF.</p> <p>j) It would not generate traffic of a type or amount inappropriate for the rural roads, byways or restricted byways affected by the proposal or require improvements to these roads, byways, or restricted byways which could be detrimental to their character and use by motorised and non-motorised traffic This criteria is not justified and goes beyond that required by national policy. The assessment of highways impacts should be consistent with Paragraph 111 of the NPPF, which states only that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Liberal Democrats</p>
<p>Consultee Full Name</p>	<p>Councillor Dr Tony Vickers</p>

Consultee Organisation	Liberal Democrats
Agent Full Name	
Agent Organisation	
Comment ID	PS1285
Chapter / Policy / Appendix Number	Policy DM 35
Chapter / Policy / Appendix Title	Sustaining a Prosperous Rural Economy
Order	193
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	

Please give reasons for your answer	<p>In the absence of the wider context that can be provided to decision makers in development management by landowners and rural businesses, it can be difficult to appreciate the longer term objectives behind a particular development proposal in the countryside. Therefore the creation of West Berkshire Rural Business Forum in late 2022 is greatly welcomed.</p> <p>We see a need for some mention of this Forum in the new Local Plan. This would encourage better relations between the Council and rural businesses and landowners facing the immense challenges of climate change, and with the wider rural community. As their elected representatives, the Council - especially in its role as Local Planning Authority - should lead initiatives such as Whole Estate Plans that should help achieve more timely decisions and better outcomes for all.</p> <p>In the absence of this proposed change, policy for sustaining a prosperous rural economy may not achieve its aim as successfully as it should with the more proactive involvement of the Council through the Rural Business Forum. In particular, we see this change as encouraging the production of Whole Estate Plans by larger estates.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	Add to end of 12.18: "Reference to Whole Estate Plans, prepared with the active involvement of appropriate officers of the Council and other public bodies, will normally be taken as evidence in support of specific development proposals. In their absence, decisions may be delayed while equivalent comprehensive evidence and negotiations have to take place."
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To give evidence as to how we see the Rural Business Forum assisting with achieving the objectives of the policy.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1300
Chapter / Policy / Appendix Number	Policy DM 35
Chapter / Policy / Appendix Title	Sustaining a Prosperous Rural Economy
Order	193

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>The policy as worded does not include any reference to enabling development or tacit support for leisure-based uses. Equally, the Council currently only recognises enabling development in the context of the preservation of historic buildings. Whilst 'enabling development' is a concept set out in the NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:</p> <p><i>"I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site."</i></p>

	<p><i>The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of the benefits it may help to provide.”</i></p> <p><i>Policy DM 35 - Supporting the Rural Economy is objected to in its present form. The policy needs to be amended to include the above additional criterion, which will allow for a wider and more appropriate definition of enabling development, which in turn will help to maintain rural enterprises, like NCGC, into the foreseeable future.</i></p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to local community and leisure facilities that will otherwise fail, as follows:</p> <p><i>xii. Enabling development will be permitted in circumstances where the capital generated will be used to improve the facilities of the rural enterprise, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the level of capital generated is proportionate to the cost of providing the improved facilities, this being secured by S106</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills

Comment ID	PS1784
Chapter / Policy / Appendix Number	Policy DM 35
Chapter / Policy / Appendix Title	Sustaining a Prosperous Rural Economy
Order	193
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	Englefield Estate cover letter REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	It is noted that draft LPR Policy DM35 has been amended to refer to 'sustaining' the rural economy rather than 'supporting' rural economy, which differs to the wording of the NPPF. For clarity and to ensure that development proposals relating to the rural economy are considered positively, it is recommended that Policy DM35 is amended to refer to 'supporting the rural economy'.

	<p>The overall provision for development relating to rural businesses is welcomed and the deletion of the need to satisfy 'all' of the criteria and to justify that other existing buildings cannot be used is also welcomed. This will help to enable a balanced judgement to be taken having regard to the overall criteria and the economic, social and environmental benefits. However, the requirement for proposals to 'make a long-term contribution' to the rural economy is considered to be onerous and unjustified. Draft Policy DM35 also continues to include considerations which are not unique to development in rural areas (e.g. impacts on heritage) but which are covered by other LPR policies, and therefore the policy as currently worded has unnecessary repetition.</p> <p>The NPPF is clear that planning policies should 'enable the sustainable growth and expansion of all types of business in rural areas' (paragraph 84). It is important therefore that the LPR does not seek to restrict rural employment uses, but rather takes a positive approach which supports diversification and the vitality of rural settlements.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The following changes are recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:</p> <p><i>'Sustaining a Prosperous Rural Economy Supporting the Rural Economy'</i></p> <p><i>'a. The proposals demonstrate that the business can make a long term contribution to the rural economy'</i></p> <p><i>'It would not have a detrimental effect on the fabric, character and setting of historic buildings or other heritage assets'</i></p> <p>Please see covering letter for further details. <see attachment></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes

Policy DM 36 Farm Diversification

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	The Wasing Estate (Represented by Pro Vision)
Consultee Full Name	The Wasing Estate
Consultee Organisation	The Wasing Estate
Agent Full Name	Sarah Pyne
Agent Organisation	Pro Vision
Comment ID	PS1756
Chapter / Policy / Appendix Number	Policy DM 36
Chapter / Policy / Appendix Title	Farm Diversification
Order	194
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 10:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Whilst the principle of allowing farm diversification proposals is supported, the Estate objects to draft policy DM26 as drafted, particularly criteria (e), (h) and (j).</p> <p>e) When new buildings are proposed, the business has not disposed of a building or converted one to a residential use in the previous 3 years which could have met the need of the development proposed; As above, criteria (e) fails to accord with Paragraph 82(d) of the NPPF that requires planning policies to be flexible and to enable a rapid response to changes in circumstances, enabling conditions in which businesses can invest, expand and adapt. This is an unnecessary criteria and prejudices those where this situation may have arisen as a result of requiring adaptation to changing circumstances. The policy, therefore, is unjustified and fails to accord with national policy.</p> <p>h) Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12 This criteria simply requires consideration of other development plan policies and therefore, for clarity and ease, should be removed as it is unnecessary duplication.</p> <p>j) It does not generate traffic of a type or amount inappropriate for the rural roads affected by the proposal or require improvements to these roads which could be detrimental to their rural character. As above, this criteria is not justified and goes beyond that required by national policy. The assessment of highways impacts should be consistent with Paragraph 111 of the NPPF, which requires only that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)</p>
<p>Consultee Full Name</p>	<p>James Hole</p>

Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1157
Chapter / Policy / Appendix Number	Policy DM 36
Chapter / Policy / Appendix Title	Farm Diversification
Order	194
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	<p>We welcome Policy DM36, which recognises the importance of farm diversification businesses in supporting the rural economy.</p> <p>However, we note that point h. requires development proposals not to harm the significance of a heritage asset in accordance with Policies SP9 and DM12. As set out in our comments to Policy SP9, we consider that this Policy is inconsistent with national policy, as it seeks to afford the same level of protection to designated and non-designated assets.</p> <p>Turning into point j., we echo our comments to Policy DM35. We consider that this point is inconsistent with the NPPF, by requiring that proposals are assessed against their impact on the character of the road. National Policy is clear that development should only be prevented refused on highway grounds where there is an unacceptable impact on highway safety or the impact on the road network would be severe.</p> <p>[...]</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	<p>We therefore recommend that Policy DM36 is revised as detailed below (additions shown <u>underlined</u> deletions shown with a strikethrough).</p> <p>[...]</p> <p>h. Any internal and external changes do not harm the significance of a <u>designated</u> heritage asset in accordance with Policies SP9 and DM12;</p> <p>j. It does not generate traffic that is <u>detrimental to highway safety</u> or amount inappropriate for the rural roads affected by the proposal or require improvements to these roads which could be detrimental to their rural character.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 37 Equestrian and Horseracing industry

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn NDP Steering Group
Consultee Full Name	Lambourn NDP Steering Group
Consultee Organisation	Lambourn NDP Steering Group
Agent Full Name	
Agent Organisation	
Comment ID	PS445
Chapter / Policy / Appendix Number	Policy DM 37
Chapter / Policy / Appendix Title	Equestrian and Horseracing industry
Order	195
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 09:31:30
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This comment is submitted by Lambourn Parish Council and Lambourn Neighbourhood Development Plan.</p> <p>Policy DM37: Equestrian and Horseracing Industry</p> <p>Lambourn Parish Council/Lambourn Neighbourhood Development Plan reiterates the comments made by the Parish Council in response to the previous Regulation 18 Consultation on WBC's LPR. The Council considers that Policy DM37 does still blur the distinction between general equestrian use and use by the horse racing industry. The distinction should be made clear, in the interests of both the HRI and general equestrian users, and show it seeks to meet the area's objectively assessed needs.</p> <p>Lambourn Parish Council / Lambourn Neighbourhood Development Plan supports the robust application and enforcement of the requirement to justify a lack of <i>demand for an alternative horseracing industry-related use (which should be the first priority)</i> (12.53) before redevelopment or permanent change of use of a horseracing facility. Supporting or ancillary facilities, as highlighted in 12.52, are an integral part of the success of the horseracing industry in the Parish of Lambourn.</p> <p>The Parish Council /LNDP also agree that proposals for development be in keeping with the character and appearance of the local area and prevent the spread of the built form in the countryside and the AONB.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Coppinger, Sam
<p>Consultee Full Name</p>	Sam Coppinger
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS439

Chapter / Policy / Appendix Number	Policy DM 37
Chapter / Policy / Appendix Title	Equestrian and Horseracing industry
Order	195
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 00:21:43
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	Not qualified to say
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	I am concerned that the LPA does not consider the health and wellbeing of racehorses when making planning decisions in Lambourn and the surrounding area. Pollution has a negative impact on horse health.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	Not qualified to say
4. Proposed Changes	The LPA should actively seek to curb development at Membury which might harm the health of racehorses in and around Lambourn.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn Parish Council
Consultee Full Name	Lambourn Parish Council
Consultee Organisation	Lambourn Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1131
Chapter / Policy / Appendix Number	Policy DM 37
Chapter / Policy / Appendix Title	Equestrian and Horseracing industry
Order	195
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 09:31:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>This comment is submitted by Lambourn Parish Council and Lambourn Neighbourhood Development Plan.</p> <p>Policy DM37: Equestrian and Horseracing Industry</p> <p>Lambourn Parish Council/Lambourn Neighbourhood Development Plan reiterates the comments made by the Parish Council in response to the previous Regulation 18 Consultation on WBC's LPR. The Council considers that Policy DM37 does still blur the distinction between general equestrian use and use by the horse racing industry. The distinction should be made clear, in the interests of both the HRI and general equestrian users, and show it seeks to meet the area's objectively assessed needs.</p> <p>Lambourn Parish Council / Lambourn Neighbourhood Development Plan supports the robust application and enforcement of the requirement to justify a lack of demand for an alternative horseracing industry-related use (which should be the first priority) (12.53) before redevelopment or permanent change of use of a horseracing facility. Supporting or ancillary facilities, as highlighted in 12.52, are an integral part of the success of the horseracing industry in the Parish of Lambourn.</p> <p>The Parish Council /LNDP also agree that proposals for development be in keeping with the character and appearance of the local area and prevent the spread of the built form in the countryside and the AONB.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lambourn Trainers Association (Represented by Rapleys LLP)
Consultee Full Name	Lambourn Trainers Association
Consultee Organisation	Lambourn Trainers Association
Agent Full Name	Ms Wakako Hirose
Agent Organisation	Rapleys LLP
Comment ID	PS1544
Chapter / Policy / Appendix Number	Policy DM 37
Chapter / Policy / Appendix Title	Equestrian and Horseracing industry
Order	195
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:57:00
Attached Files	Appendix 1 - Lambourn HRI Cluster.pdf Appendix 2 - HRI Report SQW red.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Introduction</p> <p>Lambourn Trainers' Association ('LTA'). LTA represents licensed racehorse trainers in Lambourn, one of the key stakeholders of the success of the Horse Racing Industry (HRI) in Lambourn (known as the Valley of the Racehorse), along with others including Jockey Club Estates (JCE), the owner and operator of Lambourn Training Grounds.</p> <p>The HRI cluster in and around Lambourn is identified on a plan titled Lambourn Horseracing Industry Cluster at Appendix 1 [see attachment]. The success of the HRI is vital to protecting Lambourn's racing heritage dating back to the 18th Century and making a substantial contribution to the economic, cultural and environmental well-being of the area. LTA also recognises that the HRI cluster in Lambourn is located in the North Wessex Downs AONB, where development proposals would need to be considered sensitively, and that the HRI makes a contribution to the character of the AONB.</p> <p>In this context, LTA wishes to ensure that the new Local Plan contains appropriate and clear policies to protect the HRI in Lambourn and to support its future success while recognising its location being within the AONB. Further, a Neighbourhood Plan for Lambourn is being prepared by Lambourn Parish Council, which is understood to include policies for the HRI. While LTA is broadly supportive of the draft Local Plan, it is considered that further amendments are necessary to ensure the effectiveness and the soundness of the Plan, taking into account evidence for the HRI in the area, and a Neighbourhood Plan being prepared for Lambourn.</p> <p>EVIDENCE FOR THE HORSE RACING INDUSTRY IN LAMBOURN</p> <p>Lambourn HRI Cluster</p> <p>Great Britain is the birthplace of modern thoroughbred horseracing. The high quality of racing has been central to the substance and long-term success of the country's HRI. Britain's reputation for the training and breeding of thoroughbreds as well as for high horse welfare standards, which are governed and regularised by the British Horseracing Authority ('BHA'), is internationally renowned.</p> <p>Lambourn's HRI Cluster is shown on the plan at Appendix 1 [see attachment]. It comprises: JCE owned public training grounds (or gallops), private gallops, training yards (existing and sites with planning permission) concentrated in Lambourn (including Upper Lambourn) and facilities and infrastructure supporting the HRI. The concentration of the facilities and establishments in Lambourn makes the HRI cluster a success and secures its long term viability.</p> <p>Lambourn's HRI cluster plays a crucial part in Britain's horseracing industry and international reputation. The Lambourn area is a nationally important location for the HRI. We support paragraph 4.16 of the consultation document which identifies that Lambourn serves as the heart of one of the most important areas for horseracing in the country.</p> <p>The importance of maintaining HRI facilities in Lambourn cannot be overstated. Lambourn HRI has grown since 2006, facilitated by JCE's significant investment in the public training grounds and wider infrastructure which has, in turn, encouraged investment in new and existing training yards, and is once again a successful HRI cluster. However, its reputation and JCE's investment alone cannot maintain</p>

Lambourn HRI's vitality and success as the HRI competes with the international market in terms of investment in the industry. Appropriate local policy will be critical in maintaining Lambourn HRI's success. Opportunities for further growth also need to be recognised given its contribution to the rural economy and British horseracing. Public training grounds such as those operated by JCE in Lambourn are training facilities which are made available to all licensed trainers. Due to economies of scale achievable, they enable trainers to access higher quality and a greater variety of facilities than would otherwise be possible in all but a very few cases. As well as being used by many trainers throughout their careers, public training grounds are particularly important in enabling start-up training businesses to operate without the capital or maintenance costs of their own training facilities.

In the context of the above, protection of the HRI's success can be achieved through local planning policy that balances the need to enhance and grow the HRI, while protecting the crucial features of the industry i.e. the existing facilities and establishments which make the HRI cluster.

Evidence Base

The Council's evidence cited is the Study of the Key Effects of the Horseracing Industry on the North Wessex Downs Area of Outstanding Natural Beauty dated March 2007, though this does not provide the most up to date evidence for the HRI. A report entitled "*Horse Racing in Lambourn Valley: The Industry's Economic and Social Impacts*", dated January 2019 by SQW ('the HRI Report') (Appendix 2) [see attachment] was commissioned by JCE with support from West Berkshire Council. The HRI Report describes the HRI in Lambourn and sets out the economic and social impacts of the HRI as well as the industry's needs which should be taken into account in the plan making process.

The study area is Lambourn Valley 'equine cluster' (defined as the parishes of Lambourn, East Garston and Great Shefford) and focuses on the racehorse training industry. The HRI Study identifies that there is a concentration of trainers' yards (where racehorses are cared for by trainers) in Upper Lambourn and along the B4000 Ashbury Road leading back towards Lambourn, owing to the good access to the training grounds operated by JCE and other private gallops.

In summary, the following findings are drawn from the HRI Study:

There are over 1,500 racehorses in yards, being cared for and exercised by over 500 FTE staff.

Organisations and businesses relating to the HRI (veterinary practices, horse transportation, equine surfaces and equipment, farriers, media companies specialised in racing, inns with rooms, yard & stable hygiene services, saddlers, and stud farms) in the study area employ over 160 FTE staff.

Taking into account direct and indirect Gross Added Value (GVA) contribution and induced employment and GVA contributions, the HRI's contributions to Lambourn Valley were 745 FTE staff (representing 30% of the area's total jobs) and GVA of £22 million per annum.

Whilst there are a number of trainers whose horses do not use JCE's public training grounds on a regular basis, the number of horses which do is a useful barometer of the health of the HRI in Lambourn. In 2006 the daily average was 367 horses using the public training grounds. In 2022 the daily average was 649. Several racehorse trainers from a wider area benefit from the opportunity to use JCE's facilities on a "casual" (per visit) basis; in 2006 this equated to 615 horses visiting rising to 1,286 in 2022.

In addition to the economic contribution, the HRI Study identifies the following challenges and development needs:

There is a lack of low-cost housing for staff employed in the HRI which meets the industry's requirements reflecting the nature of jobs involving animal husbandry and anti-social hours. Accommodation to be built by trainers for their staff and/or the HRI should be seen as key infrastructure for the HRI.

There are ongoing concerns with safety of horses accessing the gallops due to increase in traffic. Measures such as horse crossings and horse walks have been installed, but there is a need to ensure that appropriate mitigation and the necessary infrastructure to ensure safety of horses and other road users are considered as part of future development proposals in the area.

It is critical that the HRI continues to make investment in the area to secure Lambourn's position as a vibrant and successful equine cluster in the long term, which would in turn encourage further investment in the HRI in the area. In order to facilitate this, an appropriate policy framework is required to ensure that the HRI in Lambourn is safeguarded, its needs are met and its growth is supported.

In addition to the Council's evidence on the contribution that the industry makes to the character of the area set out in the West Berkshire Landscape Character Assessment, the SQW HRI Report should be included as evidence for the Local Plan.

POLICY DM37 – EQUESTRIAN AND RACING INDUSTRY

Structure of the Policy

Policy DM37 deals with equestrian and horseracing industry. It should be noted that the HRI's operational requirements and characteristics are entirely different from non-racing equestrian industry. Without a clear distinction separating the policy between the HRI and non-racing equestrian development, the policy would be ineffective in responding to the needs of the HRI, or worse it would fail to protect the HRI.

In this regard, the first part of the policy under the heading "Equestrian Development" appears to consider non-racing related equestrian development, as it refers to the guidance and standards set out in the Equine Industry Welfare Guidelines and the British Horse Society. These standards are not necessarily applicable to the HRI as HRI related developments (e.g. training yards) are regulated and licensed by the British Horseracing Authority ('BHA'). However, equestrian development could also mean development related to the HRI and the supporting paragraphs do not make this point clear. We therefore object to the structure of Policy DM37, as it is not clearly written, is ambiguous and it is not evident how a decision maker should react to development proposals contrary to paragraph 16 of the NPPF. We request that

the heading for the first part of the policy is amended to “Equestrian Development (*not related to Horseracing Industry*).”

Supporting text for Policy DM37 makes the interpretation of the policy unclear, particularly with the terms “equestrian activities and related development”, “the equestrian industry”, “equestrian development” and “the horseracing industry” being used interchangeably without definitions in the paragraphs 12.35 to 12.44.

Paragraph 12.35 states that equestrian activities and related development and the horseracing industry are characteristic features of West Berkshire and are of particular importance to the rural economy. There is evidence of the economic contribution the HRI makes to the economy, and the needs and impacts of the HRI industry are different from the other equestrian activities. Therefore, supporting text should follow the same structure as the policy and provide headings for each industry. More specifically, paragraph 12.38 to 12.44 should have a heading “Equestrian Development (not related to Horseracing Industry)”.

Protection of Existing HRI Facilities

We support the aspect of the policy under the heading of North Wessex Downs AONB Horseracing industry, which seeks to protect the existing establishments and facilities from uses and redevelopment not related to the HRI. As evidenced in the earlier section, contributions Lambourn’s HRI makes to Britain’s horseracing industry and the local economy are significant. Given that the area is located within AONB and developments are generally constrained, it is of critical importance that existing facilities and establishments in connection with the HRI are safeguarded for the ongoing maintenance and success of the HRI. Once an existing facility is lost, it would put the HRI’s vitality at risk as existing facilities are not easily replaceable without further development within the AONB. Therefore, robust policy is needed to ensure that existing establishments and facilities in connection with the HRI are given the necessary safeguarding.

Policy DM37 expects to retain “suitable” existing establishments or facilities under criterion i) and its application in terms of protection of existing establishments and facilities is provided in criterion iii) by way of the tests of suitability and necessity outlined in the supporting text at paragraphs 12.51 and 12.53. For clarity, criterion i) and part of criterion iii) should be combined as these are dealing with the protection of existing facilities and establishments.

In terms of suitability test, we object to criteria a), d) and e) for the following reasons:

- 1 a) The location of the site relating to the form and character of the settlement is not relevant to the suitability test relative to the retention of the existing facilities. It is a test which is ambiguous and not clear how this aspect is assessed. Any facilities or establishments which were formally used in connection with the HRI should be protected regardless of its locational relationship to the form and character of the settlement. The principle of the existing facilities location in the context of the settlement should not be a factor which determines the suitability of existing facilities/establishments to be

The impact on local roads including the safety of horses and riders and traffic using the highway should not be a factor informing the suitability of the “existing” establishments or facilities relating to the HRI. It is not clear how the decision maker will assess the impact of the retention of the existing establishments and facilities relating to the HRI for the HRI on local roads. Rather, the HRI’s existing establishments and facilities should be protected from impacts on local roads from new developments in the HRI Cluster and investment should continue to be made to improve accessibility and highway safety for all road users. The ambiguous criterion such as this will undermine the importance and need to protect the existing HRI establishments and facilities.

The availability of sources of labour and the accommodation of personnel on site or in the locality should not be a relevant factor in assessing the suitability of the site, as the availability of accommodation of personnel on site may not always be relevant to the particular use and the availability of sources of labour is not a material consideration, as the maintenance of the HRI will attract labour regardless of the availability of sources at that particular point in time. For example, the availability of labour is not questioned in the development of traditional employment developments in the determination of planning applications. It is considered that such a test goes beyond the role of planning. Moreover, this would make any development difficult to secure planning permission, given that the lack of labour within or near the HRI area is commonplace.

In order to ensure the effectiveness of the policy to safeguard the existing facilities and establishments to ensure the long-term future of Lambourn’s HRI, criteria a), d) and e) should be deleted.

Protection and Development of facilities and infrastructure supporting equestrian development

At paragraph 12.36, it explains that the shared facilities and infrastructure which support the wider equestrian industry including the HRI, commercial and recreational markets will be considered in accordance with Policy DM35 which considers developments sustaining a prosperous rural economy. Policy DM35 seeks to prevent proposals resulting in the loss of existing business sites and premises in the countryside unless it can be demonstrated that no alternative economic use can be found, and that the proposal does not have a significant negative impact upon the vitality and viability of the local economy of the surrounding area.

As the HRI Report, the HRI is supported by a range of businesses which are located in Lambourn because of the HRI. Without these businesses, the HRI in Lambourn will not be as successful and viable a cluster as it can be. Therefore, it is considered that the protection of existing businesses supporting the HRI does not go far enough under Policy DM35 and should be protected under Policy DM37, as follows:

Existing support facilities and infrastructure which support the HRI in Lambourn will be protected unless the applicant can demonstrate that there is no alternative economic use for the site within the HRI and

that the proposal does not have a negative impact upon the vitality and viability of Lambourn horseracing industry cluster.

Housing for the HRI

Housing for the HRI on site or in close proximity to facilities/establishments is key infrastructure for the future of the HRI, reflecting the nature of jobs in the HRI involving animal husbandry and anti-social hours. Therefore, we support the second part of criterion iii) which supports proposals for associated new residential accommodation in the countryside where genuine need is suitably demonstrated through a business case and accommodation cannot be reasonably secured within existing settlements. This is a separate point from the first part of criterion iii) which seeks to protect existing facilities and establishments for the HRI. Therefore, the second part of criterion iii) should be a new criterion.

Supporting text at paragraph 11.45 for Policy DM23 which addresses housing related to rural workers makes it clear that housing in the countryside essential for the HRI is supported by Policy DM37. Paragraph 11.45 provides the following guidance in terms of new housing development for the HRI:

Where new stabling or breeding facilities are proposed, together with residential accommodation, financial viability will need to be demonstrated together with supporting evidence to show the new facility has sufficient need to require a worker to be permanently living on the site in the long term. It should be noted that a restricted occupancy condition may be applied.

It is considered that this should be moved to paragraph 12.55 so that evidence needed and key considerations for residential accommodation relative to the HRI are set out in Policy DM37. In particular, the imposition of a restricted occupancy condition for the accommodation of those employed in the HRI is critical to the HRI. If a restricted occupancy condition is not imposed, racing staff/employee accommodation will be lost to non-HRI occupants. This will threaten the function and viability of the HRI establishments or facilities, leading to a permanent loss to non-HRI related uses. This point should be addressed in the supporting text.

Suggested changes to new criterion iv) is as follows:

- 1 *New residential accommodation in association with the HRI in the countryside proposed as a standalone development or as part of proposed new stabling or breeding facilities will be permitted where genuine need is suitably demonstrated through a business case and accommodation cannot reasonably be secured within existing settlements.*

Supporting the Expansion of the HRI

The significance and importance of the HRI in Lambourn and the Council's desire to support the expansion of the industry as being of particular importance to the local rural economy are recognised in the consultation document (e.g. paragraph 11.45 expressly states that the Council wishes to retain and support the expansion of the horseracing industry and Policy DM37 also states that the horseracing industry's sensitive growth will be allowed for). Paragraph 12.46 provides further guidance on sensitive development and growth of the HRI. It is understood that the emerging Neighbourhood Plan for Lambourn will look to include more detailed design guidance specific to the HRI. As such, Paragraph 12.46 should refer to the emerging Neighbourhood Plan to ensure there is a clear framework within the Local Plan upon which the Neighbourhood Plan is to be prepared relative to the HRI.

Development Affecting the Horseracing Industry

The HRI Cluster in the Lambourn area is a historical and cultural asset as well as making a significant contribution to the economy. Therefore, it should be safeguarded from developments in and around the area which would threaten the long-term sustainability of the HRI Cluster, such as those impacting on the safety of racehorses accessing training grounds, which they need to do on a daily basis. Any development that would adversely affect the economic, social and environmental role of the HRI should not be permitted. Accordingly, we suggest that the following criteria is added to Policy DM37:

"Any development within or around Lambourn horseracing industry cluster which is likely to have a material adverse impact on the operational use of an existing site within the horseracing industry (such as noise, volume of traffic, loss of paddocks or other open space, access and/or servicing requirements), or which would threaten the long term viability of the horseracing industry, will not be permitted unless the benefits would significantly outweigh the harm to the horseracing industry."

A similar policy in West Suffolk District Council's Local Plan has been effective in protecting the horseracing cluster in Newmarket.

CONCLUSION

The success of the HRI is vital to protecting the Lambourn area's racing heritage making a substantial contribution to the economic, cultural and environmental well-being of the area.

LTA wishes to ensure that the new Local Plan contains appropriate and clear policies to protect the HRI Cluster in and around Lambourn and to support its success while recognising its location being within the AONB. Further, a Neighbourhood Plan for Lambourn is being prepared by Lambourn Parish Council, which is understood to include policies for the HRI. While LTA is broadly supportive of the draft Local Plan, it is considered that amendments are necessary to ensure the effectiveness and the soundness of the Plan, taking into account evidence for the HRI in the area, and a Neighbourhood Plan being prepared for Lambourn.

These representations provide evidence identifying the national importance of the HRI in Lambourn and needs of the industry to sustain and grow its success in the long term, and seek the following amendments to Policy SP1 and DM37 and relevant supporting text for the soundness of the Plan:

To recognise the importance of the HRI to the rural economy and the Plan's commitment to the protection and support for growth of the HRI in the strategic policy;

To identify Lambourn's HRI Cluster in the Policies Map;

	<p>To make a clear distinction between equestrian development not related to the HRI and uses and developments for the HRI;</p> <p>To include the protection of the existing facilities and infrastructure for the HRI in and around Lambourn;</p> <p>To clarify the relevant consideration and necessary protection of new and existing residential accommodation in association with the HRI;</p> <p>To include a policy which protects the HRI from developments within and around the HRI Cluster;</p> <p>To make the suitability test for the protection of the existing HRI facilities and establishments effective and relevant; and</p> <p>To have regard to the emerging Neighbourhood Plan for Lambourn in relation to more detailed HRI related policies and guidance.</p> <p>It is respectively requested that these representations are fully taken into account in the current consultation process. We will be pleased to discuss our representations and work collaboratively with Planning Policy Officers.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Change the sub-heading “Equestrian Development” to “Equestrian Development (<i>not related to Horseracing Industry</i>)”</p> <p>North Wessex Downs AONB Horseracing Industry</p> <p>Whilst conserving environmental quality and countryside character, the horseracing industry in the AONB will be maintained, and its sensitive growth will be allowed for. Within this context:</p> <p>Suitable existing establishments or facilities are expected to be retained. <i>Re-development or conversion away from uses essential to the horseracing industry will be subject to the tests of suitability and necessity outlined in the supporting text to this policy;</i></p> <p>Permanent fragmentation will be resisted; <i>and</i></p> <p><i>Re-development away from uses essential to the horseracing industry will be subject to the tests of suitability and necessity outlined in the supporting text to this policy;</i></p> <p><i>Existing support facilities and infrastructure which support the HRI in Lambourn will be protected unless the applicant can demonstrate that there is no alternative economic use for the site within the HRI and that the proposal does not have a negative impact upon the vitality and viability of Lambourn horseracing industry cluster; and</i></p> <p><i>New residential accommodation in association with the HRI in the countryside proposed as a standalone development or as part of proposed new stabling or breeding facilities will be permitted where genuine need is suitably demonstrated through a business case and accommodation cannot reasonably be secured within existing settlements.</i></p> <p><i>Any development within or around Lambourn horseracing industry cluster which is likely to have a material adverse impact on the operational use of an existing site within the horseracing industry (such as noise, volume of traffic, loss of paddocks or other open space, access and/or servicing requirements), or which would threaten the long term viability of the horseracing industry, will not be permitted unless the benefits would significantly outweigh the harm to the horseracing industry.</i></p> <p>Supporting Text</p> <p>Insert a heading “<i>Equestrian Development (not related to Horseracing Industry)</i>” for Paragraphs 12.38 and 12.44.</p> <p>Paragraph 12.51</p> <p>Suitability test: In considering the suitability of existing establishments, the key factors to consider will be:</p> <ol style="list-style-type: none"> 1 <i>The location of the site relating to the form and character of the settlement;</i> 2 <i>ab.</i> The existing range of facilities on the site and their adequacy for the purpose of training and/or breeding horses, or their capability for adaptation to meet such needs; <i>and</i> 3 <i>bc.</i> The availability of and access to (including the potential for improved access) suitable gallops and training areas; <p><i>The impact on local roads including the safety of horses and riders and traffic using the highway; and</i></p> <p><i>The availability of sources of labour and the accommodation of personnel on site or in the locality.</i></p> <p>Paragraph 12.46</p> <p>“The policy aims to allow for the sensitive development and growth of the horseracing industry whilst conserving environmental quality and countryside character. This includes the built and natural form, and social and economic aspects such as the influence of the horseracing industry as part of the local economy which gives Lambourn its unique character. Outside of settlements, preference will be given to proposals that seek to locate within valleys and avoid development on hilltops or ridgelines. Equine buildings on sites which are open, exposed, elevated or sloped are likely to have particular landscape impacts that may make it difficult to achieve sensitive design solutions. <i>Design guidance specific to the horseracing industry in Lambourn will be considered in the preparation of the emerging Neighbourhood Plan for Lambourn.</i>”</p>

	<p>Move part of Paragraph 11.45 to Paragraph 12.55:</p> <p>“It is acknowledged that there is a need in some circumstances to provide accommodation close to hand in order to provide 24 hour supervision as part of licensing requirements, or for the effective running of an establishment. It is the Council’s preference for workers to be accommodated within existing nearby villages, so as to contribute to the overall sustainability of settlements and limit development in the countryside. Whilst racing charities <i>and training yard owners</i> provide some <i>low cost subsidised</i> and/or hostel accommodation in the area, it is recognised there is still a specific need for affordable single person accommodation in Lambourn. <i>Where new stabling or breeding facilities are proposed, together with residential accommodation, financial viability will need to be demonstrated together with supporting evidence to show the new facility has sufficient need to require a worker to be permanently living on the site in the long term. It should be noted that a restricted occupancy condition will be applied in order to ensure that the accommodation for staff employed in the HRI will not be lost to non-HRI occupants, as it would threaten the function and viability of the HRI establishments or facilities and could lead to a permanent loss of the HRI establishments or facilities.</i>”</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
5. Independent Examination	In order to respond to the Inspector’s MIQs on this matter effectively and clearly.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1471
Chapter / Policy / Appendix Number	Policy DM 37
Chapter / Policy / Appendix Title	Equestrian and Horseracing industry
Order	195
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes

* Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	This policy is covering two distinct subjects. It is aiming to control equestrian developments and to support the horseracing industry.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	The policy should be replaced by two: one for proposed equestrian developments and one to support the horseracing industry.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Parker, Charlie (Represented by W S P Group plc)
Consultee Full Name	Mr Charlie Parker
Consultee Organisation	
Agent Full Name	Aaron Peate
Agent Organisation	W S P Group plc
Comment ID	PS1064
Chapter / Policy / Appendix Number	Policy DM 37
Chapter / Policy / Appendix Title	Equestrian and Horseracing industry
Order	195
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:34:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

<p>alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>*LATE RESPONSE*</p> <p>Policy DM37 recognises the importance of the horseracing industry within the North Wessex Downs AONB. However, this policy should recognise the many different ways of supporting the industry outside of the establishment of new equestrian facilities by affording policy support to the re-use of inappropriate facilities which have ceased use and are unlikely to be re-used in the future. The policy recognises that permanent fragmentation should be resisted but does not provide support for positive solutions where this fragmentation has already occurred, such is the case with the Windsor House Paddocks site and its disconnection with the many uses which have located to Upper Lambourn, which offer a more suitable location and range of facilities for the equestrian industry.</p> <p>The Policy should allow some flexibility for former land used by the equestrian industry which is unlikely to be used again in the future (be it unsuitable location, facilities or fragmentation with other similar uses which inhibits the operation) to be reused in ways that still support the industry. One such instance would be the re-use of such land for housing in appropriate locations, subject to a percentage of the housing being reserved for local workers in the industry. As highlighted housing has an important role to play in maintaining the vitality of Lambourn as a rural service centre linked to the racehorse industry.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Environment Agency
Consultee Full Name	Judith Montford
Consultee Organisation	Environment Agency
Agent Full Name	
Agent Organisation	
Comment ID	PS1568
Chapter / Policy / Appendix Number	Policy DM 37
Chapter / Policy / Appendix Title	Equestrian and Horseracing industry
Order	195
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Regarding the Spatial Strategy, a Strategic Environmental Assessment (SEA) has been carried out, as part of the Local Plan appraisal process to promote sustainable environmental considerations in the preparation of the local plan.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>We have reviewed Policy DM37 - Equestrian and Horseracing industry Equestrian Development and to strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed development is not at risk of flood risk and would not cause any detrimental impact to sensitive receptors. See the suggested wording in section 4.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	<p>The Council (Under Section 33A of the Planning and Compulsory Purchase Act) in its Duty to Cooperate with other prescribed bodies/key agencies when preparing the LPR in order to address strategic planning issues relevant to their areas has engaged generally with the Environment Agency during the Plan making process.</p>
<p>4. Proposed Changes</p>	<p>To strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes these bullet points (the criteria required to satisfy proposals for this type of development) suggested below to ensure any proposed Equestrian development is not at risk of flood risk and would not cause any detrimental impact to sensitive receptors.</p> <ul style="list-style-type: none"> • <i>'Development avoids areas of high flood risk and adheres to the requirements of PPG and NPPF and if required provide a Flood Risk Assessment, in accordance with Policy SP6</i> • <i>'Development will address all environmental concerns/constraints such as wastewater drainage, to ensure the development is sustainable.'</i>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	<p>We wish to attend the examination for an opportunity to explain the need to include the suggested wording to ensure these types of developments are not at risk of flooding and would not have a negative impact on sensitive receptors.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Policy DM 38 Development on Existing Educational and Institutional Sites in the Countryside

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bradfield College (Represented by Lucy White Planning)
Consultee Full Name	Julia Bond
Consultee Organisation	Bradfield College
Agent Full Name	Lucy White
Agent Organisation	
Comment ID	PS19
Chapter / Policy / Appendix Number	Policy DM 38
Chapter / Policy / Appendix Title	Development on Existing Educational and Institutional Sites in the Countryside
Order	196
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	23/02/2023 10:11:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comment.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<ol style="list-style-type: none"> 1 Bradfield College broadly supports Policy DM38 and the allowances for new development in the countryside at existing educational sites. As noted at paragraph 12.56, Bradfield College's campus lies partially outside the settlement boundary of Bradfield College and in order to meet its ongoing operational needs it is necessary for some developments to take place beyond the settlement boundary. 2 In respect of the policy criteria, Bradfield College makes the following comments: 3 This criterion requires a demonstration that there are no existing buildings or accommodation within the site or wider ownership of the establishment, or in proximity that can reasonably be used before development would be considered acceptable in the countryside. The reference to "or in proximity" is of concern to the College. This suggests the College would need to demonstrate that buildings outside of their ownership, but in proximity to the campus, could not reasonably be used to meet the College's needs. It is not reasonable to expect applicants to assess the suitability of buildings outside of their ownership, which may not be available for purchase, to meet their needs. 4 This criterion requires the design of new buildings to respect local building styles and materials. The policy does not allow for contemporary building designs which may introduce alternative building forms and materials which contrast but complement traditional building styles. Bradfield College includes many listed buildings and heritage assets and lies within a Conservation Area. However, recent developments have included contemporary buildings including the Tennis Centre, Music School and Blackburn Science Centre which have successfully assimilated alongside traditional building styles. This policy criteria should be broadened to allow for sensitively designed contemporary buildings where appropriate. 5 This criterion states that new or replacement buildings should be located within or adjoining existing buildings or groups of buildings. A minor correction is requested to improve the legibility: <i>"New or replacement buildings are located adjoining existing buildings or within or adjoining existing groups of buildings."</i> <p>The support for proposals identified through estate plans and development frameworks at paragraph 12.58 is thoroughly welcomed by Bradfield College. The College adopted a Campus Development Framework in June 2019 with the endorsement of West Berkshire Council which establishes a framework for future development across the campus, supported by technical assessments. The Local Plan's support for development frameworks provides reassurance to schools and colleges that the time and effort involved in the production of such documents can be worthwhile and the agreed principles will carry weight in the determination of future planning applications.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<ol style="list-style-type: none"> 1 In respect of the policy criteria, Bradfield College makes the following comments: 2 This criterion requires a demonstration that there are no existing buildings or accommodation within the site or wider ownership of the establishment, or in proximity that can reasonably be used before development would be considered acceptable in the countryside. The reference to "or in proximity" is of concern to the College. This suggests the College would need to demonstrate that buildings outside of their ownership, but in proximity to the campus, could not reasonably be used to meet the College's needs. It is not reasonable to expect applicants to assess the suitability of buildings outside of their ownership, which may not be available for purchase, to meet their needs. 3 This criterion requires the design of new buildings to respect local building styles and materials. The policy does not allow for contemporary building designs which may introduce alternative building forms and materials which contrast but complement traditional building styles. Bradfield College includes many listed buildings and heritage assets and lies within a Conservation Area. However, recent developments have included contemporary buildings including the Tennis Centre, Music School and Blackburn Science Centre which have successfully assimilated alongside traditional building styles. This policy criteria should be broadened to allow for sensitively designed contemporary buildings where appropriate. 4 This criterion states that new or replacement buildings should be located within or adjoining existing buildings or groups of buildings. A minor correction is requested to improve the legibility: <i>"New or replacement buildings are located adjoining existing buildings or within or adjoining existing groups of buildings."</i>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	<p>No</p>

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Stratfield Mortimer Parish Council
Consultee Full Name	Lynn Hannawin
Consultee Organisation	Stratfield Mortimer Parish Council
Agent Full Name	Lynn Hannawin
Agent Organisation	
Comment ID	PS612
Chapter / Policy / Appendix Number	Policy DM 38
Chapter / Policy / Appendix Title	Development on Existing Educational and Institutional Sites in the Countryside
Order	196
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 10:51:55
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	The criteria for supporting development on existing educational site do not include any measure of forward planning. There should be included something like 5 or 10 year school population forecast as waiting till the need reasonable need can be actually demonstrated is too late. Schools need time to plan and build for future populations, not the current one.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039

Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1562
Chapter / Policy / Appendix Number	Policy DM 38
Chapter / Policy / Appendix Title	Development on Existing Educational and Institutional Sites in the Countryside
Order	196
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:18:00
Attached Files	PS1562 Turley (Pangbourne College) Location Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the	No

<p>delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Proposed Policy DM38 does not give sufficient recognition of the location of Pangbourne College within the AONB and the constraints that places on development within the estate, despite the policy seeking to support the College as an existing educational site.</p> <p>Attachment: Pangbourne College Location Plan</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Proposed policy DM38 Development on Existing Educational and Institutional Sites in the Countryside acknowledges the need for development at existing educational sites. Furthermore, it acknowledges that these sites can be located wholly in the Countryside outside of settlement boundaries. The supporting text to the policy makes specific reference to this being the case for Pangbourne College.</p> <p>Whilst the intent of policy DM38 is supported, it does not acknowledge or make any reference to how development on such sites will be dealt with where they are within the AONB (such as Pangbourne College), which is not considered to result in a policy which has been positively prepared, despite the positive intentions of the Policy.</p> <p>It is considered that in order to address this two changes should be made:</p> <ol style="list-style-type: none"> 1 The policies maps should be amended to give recognition to educational sites within the AONB 2 Additional wording should be added to Policy DM38 in line with that included in Policy DM37 stating: Educational Sites within the North Wessex Downs AONB Whilst conserving environmental quality and countryside character, educational establishments within the AONB will be maintained, and sensitive growth will be allowed for. <p>We also consider that changes are required to the wording of Part F of the Policy which currently places potential unjustified constraints on establishments which may have buildings of heritage value where it is important to preserve their setting or where buildings are required as outliers to the main campus for sporting, boarding or educational purposes. This should be reflected within the policy wording.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Policy DM 39 Local Community Facilities

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theatres Trust
Consultee Full Name	Mr Tom Clarke
Consultee Organisation	Theatres Trust
Agent Full Name	
Agent Organisation	
Comment ID	PS72
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	17/02/2023 10:33:09
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>Although this policy is sound in basic terms in relation to loss, we consider that the policy wording has been weakened compared to the previous version which we had supported.</p> <p>We broadly consider utilising 'viable' as a sole measure in justifying loss of facilities to be problematic and advise against it, although in this instance it could be appropriate due to the relatively good detail set out in supporting paragraphs 12.67 - 12.72 which guide applicants as to the evidence that would be expected. We recommend minor amendment to this to add a criteria seeking evidence that alternative methods of ownership or operation had been explored, such as community or voluntary ownership. This would ensure that viability is tested in a broader sense rather than on purely commercial terms; there have been several examples of supposedly redundant facilities flourishing under alternative management.</p> <p>We also recommend that the supporting text makes clear that sale or rental prices should be based on existing use and condition without development potential to avoid manipulation of lack of demand due to unrealistic values being set.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	To either strengthen the policy text more in line with the previous version, or to amend supporting text outlining evidence requirements in line with our comments above.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS185

Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	The availability of meeting places for voluntary groups and exhibitions is a welcome objective.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes	

* No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS643
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 48. DM39. There is no scope for providing outdoor sports provision, meeting areas etc. There is simply no space for such and an increase in population would increase the usage and impact on existing facilities.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Purley on Thames Parish Council
Consultee Full Name	Christopher Thompson
Consultee Organisation	Purley on Thames Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS515
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	Yes

that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	After a revised period, consultation was advised
4. Proposed Changes	None - we would ask the planning authority to take into account the attached observations
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Limes Leisure Investments (Represented by Knight Frank)
Consultee Full Name	Limes Leisure Investments
Consultee Organisation	Limes Leisure Investments LLP
Agent Full Name	Emily Brosnan
Agent Organisation	Knight Frank
Comment ID	PS595
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197

Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:43:50
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	

4. Proposed Changes	Under Policy DM39, we recommend that a site specific approach to community facilities (in terms of loss of) is adopted by the Council in the new Local Plan. This would allow for development opportunities to respond better to current / changing market conditions and demand for development. By adopting this approach, the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Mr Jonathan Sebbage
Agent Organisation	Savills
Comment ID	PS869
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 12:12:00
Attached Files	Englefield Estate cover letter REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	Yes

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	The NPPF is clear that planning policies 'should identify opportunities for villages to grow and thrive' (paragraph 79) and should enable the development of accessible local services and community facilities such as local shops (paragraph 83d). The overall presumption in favour of local community facilities in draft LPR Policy DM39 therefore reflects the provisions of the NPPF and is supported.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Community Football Club (Represented by DPDS Consulting Group)
Consultee Full Name	Newbury Community Football Club
Consultee Organisation	Newbury Community Football Club
Agent Full Name	Les Durrant
Agent Organisation	DPDS Ltd
Comment ID	PS909
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	The policies do not follow national advice
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Our main concern is that the whole approach to the regeneration of the LRIE is unsound on account of the lack of a proper planning policy context and site-specific guidance to control the development or redevelopment of the area – the strategy is inappropriate for a development of this scale.</p> <p>Our client supports this policy, especially where it states that:</p> <p>Proposals which would result in the loss of an existing local community facility will only be permitted where it can be clearly demonstrated that:</p> <p>iii. To outweigh the loss of the existing facility, the proposal will deliver equivalent or, where possible, greater community benefit which is easily accessible to the community it is intended to serve.</p> <p>Our client further supports the inclusion of “Areas or places for community outdoor sport or recreation” in the definition of local community facilities for the purposes of this policy but would also suggest that the additional phrase “...within walking distance and in the same geographical area as the existing facility ...” be added.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Our client further supports the inclusion of “Areas or places for community outdoor sport or recreation” in the definition of local community facilities for the purposes of this policy but would also suggest that the additional phrase “...within walking distance and in the same geographical area as the existing facility ...” be added.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>We believe it is necessary as we are proposing significant modifications and the site which is the subject of our core representations is both important and controversial.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	Yes

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thames Valley Chamber of Commerce (Represented by DPDS Consulting Group Ltd)
Consultee Full Name	Mr Paul Britton
Consultee Organisation	Thames Valley Chamber of Commerce
Agent Full Name	Ms Mandy Wetherell
Agent Organisation	DPDS Consulting Group Ltd
Comment ID	PS1623
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:22:00
Attached Files	DPDS obo TVCC_attachment_full rep_redacted
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes	

* No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p><See attached report for full representation - DPDS obo TVCC_attachment_full rep_redacted></p> <p><u>DM39 Local Community Facilities</u></p> <p>The Chamber supports the Council's stated aim of retaining local community facilities, only permitting proposals which would result in the loss of an existing local community facility subject to the clear demonstration of the criteria contained within this policy.</p> <p>The Chamber would like to stress the importance of local community facilities, not just for the citizens of West Berkshire but also for the local economy. Good health, happiness and wellbeing in the workforce increase productivity, alongside the great benefits they have for individuals.</p> <p>Conclusion</p> <p>These representations have outlined West Berkshire Chamber of Commerce's concerns as to the soundness of the Local Plan preparation process. The primary concern of WBCC is that the proposed policies regarding designated employment areas, in particular SP20 as exemplified by the Council's approach to LRIE, are unsound and do not go far enough to ensure that the development or redevelopment of DEAs across the district is sustainable and creates the best conditions for attracting inward investment. This is as well as the policies potentially not being appropriately justified. As they are, the policies run the risk of enabling piecemeal development at Designated Employment Areas which would result in a lower quality of land available for business use as well as potentially resulting in vital environmental investigation not being able to take place.</p> <p>As such, various modifications have been proposed to ensure the soundness of the Local Plan. Most importantly, a development-plan and SEA led framework of criteria-based site specific policies for each DEA should be adopted which would guarantee that development or redevelopment is sustainable and can create the best conditions for inwards investment and regeneration. There have also been several wider minor comments and representations on other policies throughout the Local Plan.</p> <p>To conclude, these representations have concluded that the Proposed Local Plan is potentially unsound and we therefore respectfully request that the sentiments of these representations be fully considered and reflected in further Modification to the submitted Local Plan.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	We believe it is necessary as we are proposing significant modifications and the content of our representations is important.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1472
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on	Yes

cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Chartfield Homes and Newbury & Crookham Golf Club (Represented by Opus Works)
Consultee Full Name	Newbury & Crookham Golf Club and Chartfield Homes
Consultee Organisation	Newbury & Crookham Golf Club and Chartfield Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1301
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities

Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>it is considered that Policy DM39 should provide a mechanism to enable the funding of new and expanded community facility provision. The case for supporting enabling development and the breadth of uses that this can be tailored to is set out in our response to Policy DM35, but for completeness in respect of this separate policy is reiterated below.</p> <p>Whilst '<i>enabling development</i>' is a concept set out in the 2021 NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:</p>

	<p><i>"I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site.</i></p> <p><i>The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of the benefits it may help to provide."</i></p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	<p>Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to local community facilities that will otherwise fail, as follows:</p> <p><i>"Enabling development will be permitted in circumstances where the capital generated will be used to underpin the improvement the Local Community Facilities, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the investment is necessary and that the level of capital generated is proportionate to the cost of providing the improved facilities, this being secured by S106".</i></p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	NHS Resolution
Consultee Full Name	NHS Property Services
Consultee Organisation	NHS Property Services
Agent Full Name	
Agent Organisation	
Comment ID	PS1582
Chapter / Policy / Appendix Number	Policy DM 39

Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 17:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	*Late Response* Policy DM39 Local Community Facilities states that proposals which would result in the loss of an existing local community facility will only be permitted where it can be clearly demonstrated that: <ol style="list-style-type: none"> 1 It is no longer viable to retain the facility in its current use; or 2 The facility is no longer needed and any need arising from its loss can be accommodated within easily accessible existing facilities, or 3 To outweigh the loss of the existing facility, the proposal will deliver equivalent or, where possible, greater community benefit which is easily accessible to the community it is intended to serve.

	<p>NHSPS supports the provision of sufficient, quality community facilities, but objects to specific wording within this policy. We would request that policy wording amendments will be made to support the principle that where the NHS can demonstrate a health facility will be changed as part of NHS estate reorganisation programmes, this will be sufficient for the local planning authority to accept that a facility is neither needed nor viable for its current use, and therefore that the principle of alternative uses for NHS land and property will be fully supported.</p> <p>In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can potentially have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. In instances where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate.</p> <p>The NPPF is clear in stating that Local Plans should adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 93b).</p> <p>It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.</p> <p>Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.</p> <p>With this in mind, we are keen to encourage that flexibility be granted to the NHS via the wording of any planning policy and the expectations set out in supporting text. This will ensure that the NHS can promptly and efficiently respond to the healthcare requirements of residents through the evolution of its estate.</p> <p>Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. In those cases, and where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services in that particular location, a more flexible approach for public service providers should be applied when considering a change of use to non-community uses.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We recommend the addition of the following amended wording (shown in bold):</p> <p><i>Proposals which would result in the loss of an existing local community facility will only be permitted where it can be clearly demonstrated that:</i></p> <ol style="list-style-type: none"> 1 <i>It is no longer viable to retain the facility in its current use; or</i> 2 <i>The facility is no longer needed and any need arising from its loss can be accommodated within easily accessible existing facilities, or</i> 3 <i>To outweigh the loss of the existing facility, the proposal will deliver equivalent or, where possible, greater community benefit which is easily accessible to the community it is intended to serve; or</i> 4 the loss or change of use of an existing built community facility is part of a wider public service estate reorganisation. <p>This change would directly address the issues outline above; they would ensure that the NHS is able to effectively manage its estate, disposing of unneeded and unsuitable properties where necessary, to enable healthcare needs to be met.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	

6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bewley Homes & Calcot Park Golf Club (Represented by Opus Works)
Consultee Full Name	Calcot Park Golf Club & Bewley Homes
Consultee Organisation	Calcot Park Golf Club & Bewley Homes
Agent Full Name	Jonathan Walton
Agent Organisation	Opus Works
Comment ID	PS1274
Chapter / Policy / Appendix Number	Policy DM 39
Chapter / Policy / Appendix Title	Local Community Facilities
Order	197
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 11:50:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>it is considered that Policy DM39 should provide a mechanism to enable the funding of new and expanded community facility provision.</p> <p>Whilst <i>'enabling development'</i> is a concept set out in the 2021 NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:</p> <p><i>"I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site.</i></p> <p><i>The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of the benefits it may help to provide."</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to community assets that will otherwise fail, as follows:</p> <p><i>"Enabling development will be permitted in circumstances where the capital generated will be used to underpin the improvement the Local Community Facilities, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the investment is necessary and that the level of capital generated is proportionate to the cost of providing the improved facilities, this being secured by S106"</i></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To enable the Local Plan to recognise the further assistance needed for underpin the long-term retention of leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	<p>Yes</p>

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS161
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Maintenance of the landscape will depend on the long term on the owners having both the income and the desire to do so. For major and public landscapes, this is straightforward. For small parcels of land attached to housing estates, diversified ownership is not likely to produce this result.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>A common policy for maintenance of all publically used landscape is needed.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Ridgepoint Homes Ltd</p>
<p>Consultee Full Name</p>	<p>Miss Emma Runesson</p>
<p>Consultee Organisation</p>	<p>Ridgepoint Homes Ltd</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS205</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Policy DM 40</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Public Open Space</p>
<p>Order</p>	<p>198</p>
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS</p>	<p>E-Mail</p>

* Web * Unknown	
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We do not support the absolute requirement for the provision of public open space for developments of 10 dwellings or more. We are of the view that this should be assessed based on the site's local context with regard to the availability, quality and proximity of existing nearby open spaces, including the considerations set out in points a-g in the draft policy. We therefore suggest that the draft policy is amended to state "proposals for residential development of 10 or more dwellings should provide high quality public open space, subject to the considerations set out in points a-g". We also suggest that the commentary on public open space in the sub-text of the policy includes an acknowledgement that blue infrastructure (ponds, lakes, rivers etc) is considered as part of the public open space assessment. Such infrastructure can offer a variety of recreational and leisure roles and can form a positive role in new developments.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes

Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We suggest that the draft policy is amended to state "proposals for residential development of 10 or more dwellings should provide high quality public open space, subject to the considerations set out in points a-g". We also suggest that the commentary on public open space in the sub-text of the policy includes an acknowledgement that blue infrastructure (ponds, lakes, rivers etc) is considered as part of the public open space assessment. Such infrastructure can offer a variety of recreational and leisure roles and can form a positive role in new developments.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Heritage Forum
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	Heritage Forum
Agent Full Name	
Agent Organisation	
Comment ID	PS162
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	

<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The Berkshire Gardens Trust has a more active role than the draft LPR suggests. It has carried out a survey of historic public parks in Central and East Berkshire, and wishes to extend this to West Berkshire. The Heritage Forum, in consultation with the WBC Heritage Service, will pursue this.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS644
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Herewith our response to the Local Plan 2022-2039: 49. DM40. The Plan needs to state how it will encompass open spaces within developments.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Purley on Thames Parish Council</p>
<p>Consultee Full Name</p>	<p>Christopher Thompson</p>
<p>Consultee Organisation</p>	<p>Purley on Thames Parish Council</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS516</p>

Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate?	Yes

* Yes * No	
Please give reasons for your answer	After a revised period, consultation was advised
4. Proposed Changes	None - we would ask the planning authority to take into account the attached observations
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS918
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a	No

<p>minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>DM40 – Public Open Spaces -is quite loose and it gives no details on criteria for when Sports Pitches need to be provided.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Feltham Properties (Represented by Pro Vision)
Consultee Full Name	Sean Bates
Consultee Organisation	Feltham Properties
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS760
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:22:24
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Whilst the policy is supported in general terms – access to appropriate open space is a key issue for health and well being - as drafted the policy fails to allow for consideration of local context.</p> <p>It states that the provision of on-site public open space should be made “wherever possible”. It will always be “possible” to provide open space on a development site at the expense of alternative land use, but that may not always be feasible, viable or appropriate.</p> <p>The policy should include an appropriate degree of flexibility so that sites can be developed to optimise their potential benefits. For example, where sites are located adjacent to, or otherwise very close to, existing and substantial public open space, such as urban parks or common land, the level of on-site should be adjusted. Without that flexibility, sites may not be utilised effectively and noting the heavily constrained district (including large areas of protected landscape), it is important that the development management policies are flexible to allow for optimising development potential and thereby reduce pressure for further sites.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>We propose that the policy is modified to read “<i>Wherever possible</i>feasible, on-site provision will be made to a standard of 3-4 ha per thousand population. Where more appropriate to the circumstances of the site or the open space requirements, a reduced amount of on-site provision, off-site provision, and/or a financial contribution in lieu of provision will be consideredsupported”.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Feltham Properties is a reputable local development company and is concerned that without modification this development management policy will act as barrier to sustainable development that is appropriate for its location and context.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1718
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>Paragraph 12.87 of the supporting text to Policy DM40 provides that "Public open space should be genuinely available in perpetuity to the public at large. The Council will normally seek the transfer of public open space areas into local authority ownership/control in a condition appropriate for such use, and together with a reasonable sum for their ongoing maintenance".</p> <p>Darcliffe supports the Council in seeking to ensure that public open space is genuinely available in perpetuity to the public at large. However, it would not be practical or desirable for the Council to take transfer of all areas of public open space (particularly where these areas are smaller in scale) and in certain circumstances it may be preferable that these are not transferred.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Accordingly, we would propose that the supporting text is revised to make more explicit allowance for such circumstances e.g. "However, it is recognised that in some instances it may not be practical or desirable for the public open space to be transferred and these situations will be assessed on a case by case basis".</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Sovereign Housing Association Ltd (Represented by Boyer Planning)</p>
<p>Consultee Full Name</p>	<p>Mr Matt Richardson</p>

Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1628
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Policy DM40: Public Open Space</p> <p>Paragraph 12.87 of the supporting text to Policy DM40 provides that "<i>Public open space should be genuinely available in perpetuity to the public at large. The Council will normally seek the transfer of public open space areas into local authority ownership/control in a condition appropriate for such use, and together with a reasonable sum for their ongoing maintenance.</i>"</p> <p>Sovereign supports the Council in seeking to ensure that public open space is genuinely available in perpetuity to the public at large. However, it would not be practical or desirable for the Council to take transfer of all areas of public open space (particularly where these areas are smaller in scale) and in certain circumstances it may be preferable that these are not transferred.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
4. Proposed Changes	5.21 Accordingly, we would propose that the supporting text is revised to make more explicit allowance for such circumstances; e.g., " <u>However, it is recognised that in some instances it may not be practical or desirable for the public open space to be transferred and these situations will be assessed on a case by case basis</u> ".
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1473
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	Yes

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Support policies
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	NHS Resolution
Consultee Full Name	NHS Property Services
Consultee Organisation	NHS Property Services
Agent Full Name	
Agent Organisation	

Comment ID	PS1584
Chapter / Policy / Appendix Number	Policy DM 40
Chapter / Policy / Appendix Title	Public Open Space
Order	198
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 17:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	*Late Response* NHSPS supports the principles identified in Policies DM3 and DM40 There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision

	<p>of improved health services and infrastructure, enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.</p> <p>The NPPF is clear in stating that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places” (Paragraph 92).</p> <p>Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we support the principle of policies which require an active consideration of health matters.</p> <p>Within the NHS property portfolio, a number of sites are, or may become outdated and no longer suitable for modern healthcare without significant investment. In those cases, and where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services in that particular location, a more flexible approach for public service providers should be applied when considering a change of use to non-community uses.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1593
Chapter / Policy / Appendix Number	Policy DM 41
Chapter / Policy / Appendix Title	Digital Infrastructure
Order	199
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 16:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>*Late Response*</p> <p>Page 223</p> <p>While the supporting text makes mention of mobile networks, the council should explicitly include support for mobile network in the policy statement and expand further WBDC supports multiple technology options going forward, not just FTTP!</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Macro, Alan
<p>Consultee Full Name</p>	Councillor Alan Macro
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1474
<p>Chapter / Policy / Appendix Number</p>	Policy DM 41
<p>Chapter / Policy / Appendix Title</p>	Digital Infrastructure
<p>Order</p>	199
<p>Submission Type</p> <p>* E-Mail</p>	E-Mail

* Letter * Other * SMS * Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	(d) "development should consider the mobile telecommunications requirements of the development" is far too vague and developers will be very able to avoid the requirement. A far more specific obligation is needed for this very important requirement.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	"should consider" in point d should be reworded as "should provide".

5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation
Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1695
Chapter / Policy / Appendix Number	Policy DM 41
Chapter / Policy / Appendix Title	Digital Infrastructure
Order	199
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	No

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The policy requires all residential development to enable Fibre-to-the-Premises (FTTP) at first occupation. However, the delivery of super-fast broadband connections is often not in the gift of the developer. The HBF agrees that such infrastructure is important, however, its provision is not essential and should not be considered a barrier to the occupation of new homes as indicated in this policy. Whilst the HBF supports the Council's desire for such infrastructure it is their responsibility to work with the infrastructure provider to ensure its delivery and enable developments to be connected. Given that the type of connection required of development is also set out in Part R of the Building Regulations we consider it unnecessary to set this out in local plan policy. Paragraph relating to Fibre to the Premises should therefore be deleted.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	To represent the views of our members
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS177
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The emphasis in this section on a shift away from car travel should take more account of the movement towards more working from home. More importantly, the objective to reduce emissions will be achieved as much by the transition to electric vehicles, which will become progressively more cost-effective, as by abandonment of car usage. People will continue to wish to travel on short and longer journeys, and the convenience of private motoring will continue to be strongly felt. National policy strongly supports the trend to electric transmission.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The LPR should therefore include a specific plan for the widespread availability of charging points on both private and public premises, existing as well as new.</p> <p>Judging solely from that part of Newbury where I live, bus travel has had only a limited effect. If it is to be better supported, a more strategic approach may be needed, with a wider range of routes.</p> <p>The LPR should not exclude new roads and road extensions, should those prove necessary.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Canal & River Trust</p>
<p>Consultee Full Name</p>	<p>Mrs Jane Hennell</p>
<p>Consultee Organisation</p>	<p>Canal & River Trust</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS421</p>

Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:26:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	At para 12.98 the name of the Kennet & Avon Canal is incorrect. The 'and' should be replaced by an ampersand. We are pleased to note that opportunities at other locations, including use of the Kennet and Avon Canal towpath, will be sought where applicable). Please note however the parenthesis here is incorrect. Finally, it is noted that the canal is incorrectly named at several other locations. At Para 5. 71 and Para 12.130 the name of the Kennet & Avon Canal is incorrect. The 'and' should be replaced by an ampersand.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS206
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We do not support the proposed wording for the provision of electric charging points as set in point i of the draft policy. As this does not stipulate a specific provision, it is ambiguous and may cause confusion and uncertainty for developers. The requirement for electric vehicle charging points is addressed by Building Regulations so we suggest that this policy is amended to refer to the latest Building Regulations to take account of current and future requirements. This would reflect the proposed wording of Policy DM44.</p> <p>In addition, it may be not feasible to provide a high provision of charging points on certain sites as in some locations there may be insufficient capacity in the electricity network to support this. Greater flexibility should be incorporated into this policy to address possible constraints of specific sites in accordance with Building Regulations.</p> <p>We therefore suggest that point i of this policy is amended to state "provision of electric vehicle charging points and/or associated infrastructure to future proof provision in accordance with the latest building regulations requirements, where feasible".</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.</p>
<p>4. Proposed Changes</p>	<p>We therefore suggest that point i of this policy is amended to state "provision of electric vehicle charging points and/or associated infrastructure to future proof provision in accordance with the latest building regulations requirements, where feasible".</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it</p>	<p>No</p>

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Theale Parish Council
Consultee Full Name	Theale Parish Council
Consultee Organisation	Theale Parish Council
Agent Full Name	Samantha Haywood
Agent Organisation	
Comment ID	PS645
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:16:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	Herewith our response to the Local Plan 2022-2039: 50. DM42. Theale already lacks access to facilities by public transport. The Plan makes reference to bus stops etc but Theale does not have adequate public transport. The Plan needs to address this and state how public transport will be increased sufficiently.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hermitage Parish Council
Consultee Full Name	Nicky Pierce
Consultee Organisation	Hermitage Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS385
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 10:55:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>HPC does not feel competent to provide such detailed comments on proposals for other parishes; but we would like to express our support for the following overarching policies:</p> <ul style="list-style-type: none"> DM42 Transport Infrastructure. Particularly points a. and b.as this could build on the success of Eling Way
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Network Rail
<p>Consultee Full Name</p>	Ms Lisa Bullock
<p>Consultee Organisation</p>	Network Rail
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1097
<p>Chapter / Policy / Appendix Number</p>	Policy DM 42
<p>Chapter / Policy / Appendix Title</p>	Transport Infrastructure
<p>Order</p>	200
<p>Submission Type</p> <p>* E-Mail * Letter * Other * SMS * Web</p>	E-Mail

* Unknown	
Response Date	28/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p><i>c) Comments on other LPR Draft Policies (SP1, SP5, SP23, DM42 and supporting text)</i></p> <p>In non-site-specific terms the LPR policies in respect of spatial strategy, climate change and transport considerations also raise concerns in the context of the tests of soundness. The spatial strategy, climate change policy and transport policy should equally be consistent with National Policy requirements with regard to supporting and promoting sustainable transport.</p> <p>Across the LPR there are concerns that opportunities for policies to support sustainable development and specifically to encourage modal shift (to ensure the plan is positively prepared and consistent with national policy) have not been included. This again raises issues of soundness.</p> <p>The LPR as currently drafted is not consistent with NPPF requirements in terms of meeting the challenge of climate change (paragraphs 152-154). Neither is it consistent with wider national policy</p> <p><i>d) Consideration of Tests of Soundness</i></p> <p>By reference to Response Form Question 2, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:</p>

- **The Plan is not positively prepared** – it does not respond to identified need and it does not facilitate sustainable development.

- **The Plan is not justified** – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPF. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.

- **The Plan is not Consistent with National Policy** – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

e) Changes required to make the West Berkshire Proposed Submission (Reg 19) Local Plan Sound

By reference to **Response Form Question 4** changes are identified as being required to make the West Berkshire Proposed Submission Local Plan sound. Specifically, the changes are required to ensure the plan is positively prepared, justified, and consistent with National Policy.

To address the concerns raised with regard to soundness and specifically the failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes are sought in the context of spatial strategy, climate change and transport policies. Additionally, in site specific terms express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan 'sound' are as follows: (Changes required shown in red underlined/struck through). It is confirmed that the schedule of required changes has been jointly drafted and agreed between NR, Bectonforth and the Englefield Estate.

Schedule of Required Changes

(e) Policy DM42, Transport Infrastructure

“Proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by design of developments that support low levels of travel with a focus on local journeys that can be made sustainably *and that support more sustainable freight distribution practices. Development which encourages modal shift of goods and people to more sustainable forms of transport will be supported.* Developments will be required to be supported by a range of infrastructure associated with different transport modes. New development will only be supported where the relevant transport infrastructure is delivered in a timely manner. Where required....”

- a. Connections and improvements
- b. Walking, cycling and
- c. Secure cycle and
- d. Improvements to
- e. Provision of real
- f. New or improved
- g. Improvements to
- h. Works to
- i. Provision of electric vehicle charging points and associated infrastructure; *and*
- j. Measures to improve the movement of people and goods by rail.*

(f) Policy DM42, Supporting Text (paragraph 12.95)

12.95 The development and delivery of transport infrastructure will need to contribute to the aims of Policy SP23 and.....Transport Plan. There is a need for development to assist in the provision of deliverable measures that will contribute towards modal shift to sustainable modes for travel for residents and employees of both new, and if possible, for existing communities *and towards modal shift to sustainable modes for the transport of freight.*

	Early discussion with West Berkshire Council with regard to the representations made and suggested changes would be welcomed.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Purley on Thames Parish Council
Consultee Full Name	Christopher Thompson
Consultee Organisation	Purley on Thames Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS517
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements	Yes

<p>with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
<p>Please give reasons for your answer</p>	After a revised period, consultation was advised
<p>4. Proposed Changes</p>	None - we would ask the planning authority to take into account the attached observations
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1200
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	Yes

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>The policy advises that 'travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably.' However, travel activity should only be expected to be minimised by car. Travel activity by other sustainable modes should be welcomed for the economic benefits that accrue from travel.</p> <p>The policy fails to reference accommodating electric scooters in the event that their use on the external highway network becomes legal. This should be rectified to allow flexibility in approach should such legislation change during the plan period.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Review the use of 'travel activity' to be focussed on use of car, supporting travel activity by other sustainable modes.</p> <p>Flexibility should be included with regards to use of scooters should such become legal during the plan period</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Englefield Estate (Represented by Savills)
<p>Consultee Full Name</p>	Englefield Estate
<p>Consultee Organisation</p>	Englefield Estate Office
<p>Agent Full Name</p>	Vilna Walsh
<p>Agent Organisation</p>	Firstplan

Comment ID	PS761
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:46:00
Attached Files	Firstplan (Englefield Estate) Appendix 3.pdf Firstplan (Englefield Estate) Appendix 1.pdf Firstplan (Englefield Estate) Full Rep.pdf Firstplan (Englefield Estate) Appendix 4.pdf Firstplan (Englefield Estate) Appendix 2.pdf Firstplan (Englefield Estate) Appendix 5.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	No comment
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No

<p>Please give reasons for your answer</p>	<p><i>For Full Representation see attachment.</i></p> <p><i>By reference to Response Form Question 2, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:</i></p> <ul style="list-style-type: none"> • <i>The Plan is not positively prepared – it does not respond to identified need and it does not facilitate sustainable development.</i> • <i>The Plan is not justified – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.</i> • <i>The Plan is not Consistent with National Policy – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); and considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</i>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>No comment</p>
<p>4. Proposed Changes</p>	<p><Proposed Changes shows as underlined for additions and strikethrough for deletions></p> <p>Policy DM42, Transport Infrastructure</p> <p>“Proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by design of developments that support low levels of travel with a focus on local journeys that can be made <u>sustainably and that support more sustainable freight distribution practices. Development which encourages modal shift of goods and people to more sustainable forms of transport will be supported.</u> Developments will be required to be supported by a range of infrastructure associated with different transport modes. New development will only be supported where the relevant transport infrastructure is delivered in a timely manner. Where required....”</p> <ol style="list-style-type: none"> 1 Connections and improvements 2 Walking, cycling and 3 Secure cycle and 4 Improvements to 5 Provision of real 6 New or improved 7 Improvements to 8 Works to 9 Provision of electric vehicle charging points and associated infrastructure; and 0 <u>Measures to improve the movement of people and goods by rail.</u> <p>Policy DM42, Supporting Text (paragraph 12.95)</p> <p>12.95 The development and delivery of transport infrastructure will need to contribute to the aims of Policy SP23 and.....Transport Plan. There is a need for development to assist in the provision of deliverable measures that will contribute towards modal shift to sustainable modes for travel for residents and employees of both new, and if possible, for existing communities <u>and towards modal shift to sustainable modes for the transport of freight.</u></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p><i>Response made raises significant issues with regard to the soundness of the plan if the proposed amendments are not made.</i></p>

6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Burghfield Parish Council
Consultee Full Name	Ms Cally Morris
Consultee Organisation	Burghfield Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1591
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	08/03/2023 16:17:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into	

<p>account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p><i>*Late Response*</i></p> <p>Page 216</p> <p>As previously noted, should there be a cross reference with Policy SP22 Transport.</p> <p>Is there any thought on WBDC developing a digital/online information of car/motorcycle parking areas and associated charges etc to help people plan travel and parking in the district?</p> <p>What about development of cycle highways to interconnect population centers working with national and local organisations to achieve this?</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p>	

* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Green Park Reading No.1 LLP (GPR) (Represented by Deloitte)
Consultee Full Name	Green Park Reading No1. LLP (GPR)
Consultee Organisation	Green Park Reading No.1 LLP (GPR)
Agent Full Name	Phil Wright
Agent Organisation	Deloitte
Comment ID	PS1224
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:50:00
Attached Files	Deloitte obo Green Park Reading No1 LLP_Figure 1.PNG
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? -	

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

- * Yes
- * No

Please give reasons for your answer

West Berkshire Local Plan Review to 2039 – Regulation 19 Proposed Submission Consultation

We write on behalf of our client Green Park Reading No.1 LLP, which is the owner of Green Park. Green Park Reading No.1 LLP (“GPR”) is ultimately wholly owned by Mapletree Investments Pte Ltd (“Mapletree”). This response relates to the Regulation 19 Proposed Submission Consultation of the West Berkshire Local Plan Review (“the LPR”), which is open for comment until 3 March 2023. Deloitte previously responded to two Regulation 18 Consultations on behalf of GPR on 21 December 2018 and 5 February 2021.

In writing this letter, we do so under the statutory provisions of a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012.

Background to Green Park

Since acquiring GPR in 2016, Mapletree has been reviewing the Park’s potential, undertaking asset management and considering future opportunities. GPR is keen to support the Council in achieving sustainable development in the Borough.

Green Park is a premier business park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of the three local authority areas, covering a 79-hectare plot offering high quality office stock and associated amenities, located around a central body of water.

Green Park is accessed from the A33 relief road and is located south of Reading town centre. The Park is home to a variety of office occupiers across a range of business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.

The Park continues to be highly successful with ongoing interest from both global and smaller companies for office space. In 2016/17, Aukett Swanke undertook a refresh of the Fosters masterplan prepared in 1998 in order to update the development potential of the Park. Mapletree continue to look for opportunities to respond to market demand and manage the planned growth of the Park in a sustainable way. Securing an allocation for employment uses on land at 900 South Oak Way forms part of this ambition (referred to hereafter as the Site (see Figure 1 below)).

[See attached map - Deloitte obo Green Park Reading No1 LLP_Figure 1]

Previous Response to Regulation 18 Draft Local Plan

On behalf of GPR, Deloitte submitted formal representations in response to the LBW Pre-Publication (Regulation 18) Draft Local Plan on 21 December 2018 and 5 February 2021. As part of the previous consultation, GPR proposed a series of changes, including the below:

- Requested that Green Park was included as a Designated Employment Area;
- Requested an emphasis on the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park;
- Requested support for Data Centres; and,
- Requested clarification be added to Policy SP 4 that although the Office for Nuclear Regulation will be consulted, it is unlikely this will restrict non-residential development in the Detailed Emergency Planning Zone (DEPZ).

Local Plan Regulation 19 Response

Policy DM42: Transport Infrastructure

Policy DM42 identifies the types of transport infrastructure that new development will be expected to make a contribution towards. As covered in GPR’s previous representations, GPR wishes to reemphasise the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park. This is vital to supporting West Berkshire and the wider Thames Valley area as it continues to grow as an important employment location. GPR continues to request that an additional bullet point is included in Policy DM42 as follows: *“Improvements to the M4 motorway and strategic road network in the Thames Valley”*.

Policy DM42 also states that travel activity will be expected to be minimised by the design of developments to support low levels of travel and be reached by local journeys. GPR is supportive of this part of the policy’s aspirations but would like to highlight that the reach of employment parks can extend to further authorities and that their locations are often in order to attract tenants wishing to attract high quality employers and employees. Therefore, requiring a sole focus on local journeys could prevent the sustainable growth of employment sites.

Summary

In summary, GPR welcomes the West Berkshire LPR and the published Regulation 19 document. However, GPR requests several modifications to the LPR as set out in this letter. In particular, GPR requests that the identified Site is classified as a Designated Employment Area to reflect its existing uses

	and its existing allocation, and that additional guidance is given in relation to the consultation process and considerations for development located within a DEPZ.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beftonforth Ltd (Represented by PSP Consulting)
Consultee Full Name	Beftonforth Ltd
Consultee Organisation	
Agent Full Name	Patrick Gurner
Agent Organisation	PSPconsulting
Comment ID	PS1512
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:01:00
Attached Files	PSPconsulting on behalf of Beftonforth Ltd REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	All as set out in detail in the Local Plan Review Documentation
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
Please give reasons for your answer	<p>[See attached document for full accompanying statement - PSPconsulting obo Beftonforth Ltd REDACTED]</p> <p>Please refer to Section 3 and Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 3 - POLICY REVIEW INCLUDING DRAFT POLICIES DM43 AND DM42</p> <p>National Planning Policy Framework (NPPF July 2021)</p> <p>The National Planning Policy Framework (NPPF) has a presumption in favour of sustainable development at its heart. Of particular relevance to the potential for growth in rail use at the Theale Railhead, Beftonforth have highlighted below particular elements of National Policy which support the Government's intention to increase the use of rail freight to assist in achieving national decarbonisation targets and deliver net-zero.</p> <ul style="list-style-type: none"> • At NPPF paragraph 106(c), planning policies should: "identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;" • At NPPF paragraph 106(e) planning policies are also required to: "provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy..." • Footnote 44 on page 31 confirms that: "Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight," [our underlining]. • NPPF paragraph 83 is clear that in the context of building a strong, competitive economy:

“Planning policies and decisions should recognise and address the specific locational requirement of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” [our underlining].

• At NPPF paragraph 152 *In the context of meeting the challenge of climate change, the planning system should help to:*

“shape places in ways that contribute to radical reductions in greenhouse gas emissions...”.

• And NPPF paragraph 153 requires that:

“Plans should take a proactive approach to mitigating and adapting to climate change...”.

- Similarly, NPPF paragraph 154 confirms that new development should be planned in ways that: *“can help reduce greenhouse gas emissions...”.*

The consultation on the December 2022 proposed updates to the NPPF, which run to March 2023, do not propose any material change to the NPPF paragraphs quoted above.

The Planning Practice Guidance (PPG) on Climate Change gives advice at paragraph 003 on *“How the challenges of climate change can be addressed through the Local Plan”*. The Guidance states that *“there are many opportunities to integrate climate change mitigation and adaptation objectives into the Local Plan. Sustainability appraisal can be used to help shape appropriate strategies in line with the statutory duty on climate change and ambition in the Climate Change Act 2008.*

Examples of mitigating climate change by reducing emissions:

- *Reducing the need to travel and providing for sustainable transport;”*

Draft Policy DM42 Transport Infrastructure

Section 12 of the Proposed Submission Draft Local Plan covers Development Management Policies ‘Fostering Economic Growth & Supporting Local Communities’. Draft Policy DM42 ‘Transport Infrastructure’ is below:

> see Policy DM42 text in attached document - PSPconsulting obo Beftonforth Ltd REDACTED <

The Supporting Text to Draft Policy DM42 (paragraph 12.95) explains that *“the development and delivery of transport infrastructure will need to contribute to the aims of Policy SP23 and relevant Council strategies and plans, such as the West Berkshire Environment Strategy, July 2020 and the Local Transport Plan. There is a need for development to assist in the provision of deliverable measures that will contribute towards modal shift to sustainable modes of travel for residents and employees of both new development, and if possible, for existing communities”*.

Beftonforth consider that the movement of people and goods by rail is a fundamental omission from Draft Transport Policy DM42, placing this draft policy in conflict with the December 2022 adopted Minerals & Waste Local Plan Transport Policy 22 (December 2022) and National and Regional Transport Policy objectives. The Draft Policy DM42 should recognise that measures which contribute towards modal shift to sustainable modes of travel, including by rail, apply equally to the movement of goods, as well as for residents and employees. Appropriately, Submission Draft Local Plan paragraph 4.9 recognises that *“.... transport linkages, by rail and road are vital”*.

Draft Policy DM42 should thus be extended to emphasise the importance of moving people and goods by rail, by including a new item:

j. measures to improve the movement of people and goods by rail.

In addition, the wording of Draft DM42 Supporting Text paragraph 12.95 should also be extended, by adding *including the movement of goods*.

In Beftonforth’s opinion, without the above changes Draft Policy DM42 is Unsound. With the above changes, Draft Policy DM42 would be Sound and would be in line with adopted Minerals & Waste Local Plan Transport Policy 22 (December 2022).

As explained in Section 4 of these representations, the Required Changes to the Regulation 19 Submission Draft Local Plan, to make the Plan Sound, have been agreed with Network Rail and the Englefield Estate.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>All as set out in detail in the Local Plan Review Documentation</p>
<p>4. Proposed Changes</p>	<p>Please refer to Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 4 - REQUIRED CHANGES TO MAKE THE PLAN SOUND</p> <p>With reference to Response Form Question 2, in the absence of any wording in the Regulation 19 Submission Draft Local Plan expressly supporting the growth of the Theale Railhead, and with wider omissions with respect to the Spatial Strategy, Climate Change Policy and Transport Policies, the Submission Draft Local Pan is not considered to meet the tests of Soundness for the reasons identified above and summarised below:</p>

The **Submission Draft Local Plan is not positively prepared** since it does not respond to identified need and it does not facilitate sustainable development in accordance with National and Regional Policy.

The **Submission Draft Local Plan is not justified** since it fails to deliver an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives.

There is no clear audit trail as to why this approach has been adopted and changed from the adopted Development Plan and from earlier stages of the current Local Plan Review. The Sustainability Appraisal fails to consider the increased use of rail freight consistent with National and Local Policy, when the evidence points to the need to support the growth in rail freight provision. The Sound approach and reasonable alternative would be to provide supporting text which supports the growth of rail freight at Theale and to have this expressed within the Policy itself.

The **Submission Draft Local Plan is not Consistent with National Policy** in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site-specific considerations of the Theale Rail-Road Transfer Site under Policy DM43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.

Changes required to make the West Berkshire Regulation 19 Proposed Submission Draft Local Plan Sound

With reference to **Response Form Question 4** changes have been identified below which are considered necessary to make the Submission Draft Local Plan Sound. The changes are required to ensure that the Submission Draft Local Plan is positively prepared, justified, and consistent with National Policy.

To address the concerns raised in these representations with regard to Soundness, and specifically the failure of the Submission Draft Local Plan to appropriately identify and support modal shift in the context of the movement of freight, changes are sought below with respect to spatial strategy, climate change and transport policies. Additionally, in site specific terms, express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan 'Sound' are shown below in red underline or strike through.

It is confirmed that the schedule of required changes set out below, has been jointly drafted and agreed between Network Rail, Bectonforth and the Englefield Estate.

(e) Policy DM42, Transport Infrastructure

"Proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by design of developments that support low levels of travel with a focus on local journeys that can be made sustainably and that support more sustainable freight distribution practices. Development which encourages modal shift of goods and people to more sustainable forms of transport will be supported. Developments will be required to be supported by a range of infrastructure associated with different transport modes. New development will only be supported where the relevant transport infrastructure is delivered in a timely manner. Where required...."

- a. Connections and improvements
- b. Walking, cycling and
- c. Secure cycle and
- d. Improvements to
- e. Provision of real
- f. New or improved
- g. Improvements to
- h. Works to
- i. Provision of electric vehicle charging points and associated infrastructure; and
- j. Measures to improve the movement of people and goods by rail.

(f) Policy DM42, Supporting Text (paragraph 12.95)

12.95 The development and delivery of transport infrastructure will need to contribute to the aims of Policy SP23 and.....Transport Plan. There is a need for development to assist in the provision of deliverable measures that will contribute towards modal shift to sustainable modes for travel for residents and employees of both new, and if possible, for existing communities and towards modal shift to sustainable modes for the transport of freight.

<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain in detail to the Inspector, the importance of the Local Plan Review including the opportunity for the growth of rail freight at the Theale Railhead.</p>
<p>6. Notification of Progress of the Local Plan Review - The</p>	<p>Yes</p>

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1333
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Object. The policy is inconsistent with the NPPF 2021, not justified or effective.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>Proposed amendment 1.</p> <p>The word 'proportionate' before 'contribution' in the first paragraph of heading text should be retained. This should be included as it forms one of the tests as set out in paragraph 57 of the NPPF and Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010. The wording should remain as follows: "Where required, new development will be expected to make a <u>proportionate</u> contribution to the provision or improvement of a range of transport infrastructure."</p> <p>Proposed amendment 2.</p> <p>To ensure that contributions to transport infrastructure provision meets the NPPF paragraph 57 tests, the following phrase should be added to criterion f. "f. New or improved passenger transport services, <u>where appropriate</u>."</p> <p>Proposed amendment 3.</p> <p>Development should not provide improvements to the operational capacity of the local road network unless they are necessary or the impact is severe. Unnecessarily building in capacity would encourage car use and be contradictory to other environmental policies. "g. Improvements to the safety and operational capacity of the local highway network, <u>where appropriate</u>."</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Yes to explain the extent of variation from national policy, which makes the policy unsound.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes	Yes

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1158
Chapter / Policy / Appendix Number	Policy DM 42
Chapter / Policy / Appendix Title	Transport Infrastructure
Order	200
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	Yes

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>We support the Council's position in seeking to tackle the climate emergency through promoting a sustainable transport network. However, we note that this policy as worded seems to apply to all types of development and does not take into consideration the type and size of developments, as well as their location. Indeed, we consider that this policy fails to recognise the rural nature of West Berkshire's District and the limited availability of public transport modes in more remote areas.</p> <p>The Policy requires travel activity to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably. We query how this can reasonably be applied to modest developments in the countryside where the offer of public transport is limited or non-existent. Furthermore, we consider that the Policy's requirement for developments to be supported through a range of infrastructure associated with different transport modes may place unnecessary burden on smaller developments. For these reasons, we do not consider that this Policy is justified.</p> <p>Finally, we note that there is a conflict between the requirements of this Policy and Policies DM35 and DM36. On one hand, the Council seeks to support businesses in rural areas, however Policy DM42 is stringent and does not appear to reflect or acknowledge the more limited accessibility in terms of public transport to rural areas. We would therefore encourage the Council to adopt a more flexible approach within this policy in relation to the rural economy.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>We therefore recommend that Policy DM42 is revised as detailed below (additions shown <u>underlined</u> deletions shown with a strikethrough).</p> <p><u>Where relevant</u>, Proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably. Developments will be required to be supported through a range of infrastructure associated with different transport modes <u>in a manner that is proportionate to the proposed development and takes into account its location</u>. New development will only be supported where the relevant transport infrastructure is delivered in a timely manner. Where required, new developed will be expected to make a <u>proportionate</u> contribution to the provision or improvement of a range of transport infrastructure. This transport infrastructure will specifically, but not exclusively, include the following:</p> <p>[...]</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	

Policy DM 43 Theale Rail-road Transfer Site

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Beftonforth Ltd (Represented by PSP Consulting)
Consultee Full Name	Beftonforth Ltd
Consultee Organisation	
Agent Full Name	Patrick Gurner
Agent Organisation	PSPconsulting
Comment ID	PS696
Chapter / Policy / Appendix Number	Policy DM 43
Chapter / Policy / Appendix Title	Theale Rail-road Transfer Site
Order	201
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:01:00
Attached Files	PSPconsulting on behalf of Beftonforth Ltd REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	All as set out in detail in the Local Plan Review Documentation
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>[See attached document for full accompanying statement - PSPconsulting obo Beftonforth Ltd REDACTED]</p> <p>Please refer to Section 3 and Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 1 - INTRODUCTION</p> <p>PSPconsulting (PSP) are appointed by Beftonforth Limited (Beftonforth) to give highways and transport planning advice in relation to their land which forms part of the Theale Railhead.</p> <p>The Beftonforth land is the last parcel of land within the Theale Railhead to come forward for development under Development Plan Saved Policy ECON.7. Across the period 2021 and 2022, PSP have designed the new access road to the Beftonforth land, required by Saved Policy ECON.7, and PSP have provided support and advice with respect to West Berks review of the Minerals & Waste Local Plan.</p> <p>PSP are now instructed to prepare this response, on behalf of Beftonforth, in relation to the West Berks Proposed Submission Draft Local Plan. Beftonforth fully support the continued identification of the Theale Railhead under Draft Policy DM43 'Theale Rail-Road Transfer Site' and as shown on the Draft Policies Map. However, Beftonforth consider the removal of the positive provisions relating to the potential for growth of the Theale Railhead is not consistent with National or Local Policy and the Proposed Submission Draft Local Plan has therefore not been Positively Prepared and is Unsound.</p> <p>The Beftonforth land (circled below), lies between the Puma Energy Oil Depot and the mainline railway. The Beftonforth land has been derelict for many years and was formerly a builder's yard.</p> <p>> see map on pg 1 of attached document - PSPconsulting obo Beftonforth Ltd REDACTED <</p> <p>SECTION 2 - BACKGROUND</p> <p>The current Development Plan for West Berkshire includes the Core Strategy (2006–2016) which was adopted in 2012 and the 1991-2006 Local Plan Saved Policies, set out in the Council's September 2007 Written Statement. The 1991-2006 Local Plan was adopted in 2002.</p> <p>Saved Policy ECON.7 'Safeguarding Rail-based Industry at Theale' is detailed on page 79 of the Written Statement (extract below). Saved Policy ECON.7 includes the Beftonforth land, which is described below as a builder's yard, house and paddock.</p> <p>> see Local Plan text on pg 2 of attached document - PSPconsulting obo Beftonforth Ltd REDACTED <</p> <p>Saved Policy ECON.7 states that "any development of this site [ie the Beftonforth land] should be subject to satisfactory road access, this access should be contained from within the existing rail site and not from outside". This comment is a reference to the unsuitability of using the existing access to the Beftonforth land along Wigmore Lane in front of the existing residential properties. The properties are close to the road, the road width is narrow and the road surface is not in a good condition.</p> <p>The extract below from the Core Strategy Proposals Map shows:</p> <ul style="list-style-type: none"> • the access to the Theale Railhead, and the Wigmore Lane residential properties, from the primary road network at the A4 roundabout; • the Theale Railhead cross-hatched in brown; • the Theale Protected Employment Area cross-hatched in red; and • the existing residential properties fronting Wigmore Lane, to the west of the Railhead and to the south of the A4. <p>> see map on pg 3 of attached document - PSPconsulting obo Beftonforth Ltd REDACTED <</p> <p>Public Rights of Way</p> <p>The extract below from the West Berkshire Online Public Rights of Way Map shows public footpath SULH/2/2 with Theale FP19 running along the southern section of Wigmore Lane to the railway line. The West Berkshire Highway Records Team have confirmed that this section of Wigmore Lane is not publicly maintained highway.</p> <p>> see map on pg 4 of attached document - PSPconsulting obo Beftonforth Ltd REDACTED <</p> <p>The Beftonforth land is the last remaining undeveloped parcel of land within the Theale Railhead and Beftonforth have been working with Network Rail to bring forward the delivery of a new access road and a new rail sidings to serve the Beftonforth land. Following early discussions between Network Rail, Beftonforth and Puma Energy, PSP were instructed to work with Network Rail and Puma Energy to prepare the design of a new access road, consistent with the requirements of Saved Policy ECON.7. PSP have subsequently prepared two new access road designs, running through the Puma Energy site to the Beftonforth land, to avoid passing in front of the Wigmore Lane residential properties. Both of these</p>

designs are agreed with Network Rail and Puma Energy, and are shown illustratively on enclosed **Drawing 2422/100** >See attached document PSPconsulting obo Bectonforth Ltd REDACTED>

- The first access road design incorporates Wigmore Lane (south) and this was the subject of the Prior Approval application (21/02298/PAD56) to West Berks in September 2021; and
- The second access road design is off-set from Wigmore Lane (south) and runs behind a Network Rail security fence. This access road can be delivered under Network Rail's statutory powers and does not need any approval from West Berks.

With a suitable new access road designed and agreed with Network Rail and with Puma Energy, Network Rail instructed their Engineering Team to look at the new rail sidings to serve the Bectonforth land. The proposed rail sidings are shown illustratively on enclosed **Drawing 2422-105** >See attached document PSPconsulting obo Bectonforth Ltd REDACTED>. Approximately 300m of new rail sidings are proposed on the Bectonforth land, situated parallel and adjacent to the existing mainline railway.

It is expected that the new rail sidings will be used to import aggregates and Network Rail Operational Division have confirmed that the Bectonforth land would have a likely maximum capacity of 375,000 tonnes of aggregates per annum. Puma Energy have agreed that the new rail sidings can run along the edge of their operational area, currently used for lorry parking.

During the course of the preparation of the access road and rail sidings designs, Bectonforth met with Network Rail and the Englefield Estate to discuss the opportunities for expanding rail use at the Theale Railhead to include an intermodal rail freight facility.

As Network Rail explain in their response to the Submission Draft Local Plan, rail freight contributes to the economy and plays a significant role in modal shift, reducing congestion and carbon emissions, and supporting long-term sustainable growth. Future freight growth forecasting identifies significant continued growth of rail freight and it is anticipated that the Government will set a rail freight growth target to be factored in to Network Rail's strategic planning framework. It is Network Rail and the Government's intention to increase the use of rail freight to assist in achieving national decarbonisation targets and deliver net-zero.

The Spring 2022 Rail Industry Review of potential Intermodal Rail Freight Interchange sites is summarised in the Network Rail response to the Submission Draft Local Plan. From an original long list of over 600 sites across the UK, the search for suitable locations identified only four sites within the Southeast of England and of these four sites, the land west of Wigmore Lane has been identified as the only site capable of serving the western part of the region. Network Rail has thus been in discussions with the Englefield Estate, the owners of the land west of Wigmore Lane to investigate the potential the land offers to secure modal shift from road to rail and meet the identified demand for further rail served development in this area.

Network Rail, the Englefield Estate and Bectonforth have agreed to work together to ensure that any rail-based development of the Bectonforth land, and particularly the design of the new rail sidings, will not prejudice or preclude the opportunity to extend the rail sidings westwards into the land west of Wigmore Lane. The following joint statement is agreed between the parties:

It is confirmed that Network Rail, Bectonforth and Englefield Estate have been liaising with regard to the Bectonforth proposals and Network Rail's identification of the potential that land west of Wigmore Lane offers for expansion. It is understood by all parties that growth of the existing Theale Rail-Road Transfer Site will require close working between the three parties and that connection to the main line for land west of Wigmore Lane would ideally be taken via the Bectonforth Land.

All parties are committed to working jointly to ensure that development of the Bectonforth land is brought forward for rail freight use in accordance with the current Development Plan and that the potential for the future growth of rail freight provision at Theale on land west of Wigmore Lane is safeguarded and protected.

There is agreement that the provision for future rail expansion must be taken into consideration and all siding designs on the Bectonforth land will not fetter further rail connections to the west (land west of Wigmore Lane). Network Rail and the Englefield Estate are making their own representations to the Local Plan Review which, amongst other things, reflect the above position.

SECTION 3 - POLICY REVIEW INCLUDING DRAFT POLICIES DM43 AND DM42

National Planning Policy Framework (NPPF July 2021)

The National Planning Policy Framework (NPPF) has a presumption in favour of sustainable development at its heart. Of particular relevance to the potential for growth in rail use at the Theale Railhead, Bectonforth have highlighted below particular elements of National Policy which support the Government's intention to increase the use of rail freight to assist in achieving national decarbonisation targets and deliver net-zero.

- At NPPF paragraph 106(c), planning policies should:

"identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;"

- At NPPF paragraph 106(e) planning policies are also required to:

"provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy..."

- Footnote 44 on page 31 confirms that:

"Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight," [our underlining].

- NPPF paragraph 83 is clear that in the context of building a strong, competitive economy:

“Planning policies and decisions should recognise and address the specific locational requirement of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.” [our underlining].

• At NPPF paragraph 152 *In the context of meeting the challenge of climate change, the planning system should help to:*

“shape places in ways that contribute to radical reductions in greenhouse gas emissions...”.

• And NPPF paragraph 153 requires that:

“Plans should take a proactive approach to mitigating and adapting to climate change...”.

- Similarly, NPPF paragraph 154 confirms that new development should be planned in ways that: *“can help reduce greenhouse gas emissions...”.*

The consultation on the December 2022 proposed updates to the NPPF, which run to March 2023, do not propose any material change to the NPPF paragraphs quoted above.

The Planning Practice Guidance (PPG) on Climate Change gives advice at paragraph 003 on *“How the challenges of climate change can be addressed through the Local Plan”*. The Guidance states that *“there are many opportunities to integrate climate change mitigation and adaptation objectives into the Local Plan. Sustainability appraisal can be used to help shape appropriate strategies in line with the statutory duty on climate change and ambition in the Climate Change Act 2008.*

Examples of mitigating climate change by reducing emissions:

- *Reducing the need to travel and providing for sustainable transport;”*

Draft Policy DM43 Theale Rail-road Transfer Site

The Theale Railhead site is identified on the currently adopted West Berkshire Core Strategy Policies Map under Saved Policy ECON.7 ‘Safeguarding Rail- Based Industry at Theale’, and has been more recently confirmed in the adopted Minerals & Waste Local Plan (December 2022) under Policy 9 and the associated Policies Map. The Theale Railhead is a key rail freight site serving the region and the continued identification of this site on the Submission Draft Local Plan Policies Map and by Draft Policy DM43 ‘Theale Rail-Road Transfer Site’ is fully supported.

However, Beftonforth consider the removal of the positive provisions relating to the potential for growth of the Theale Railhead, contained in Saved Policy ECON.7 and Regulation 18 Draft Policy DC31, is not consistent with National or Local Policy and the Regulation 19 Proposed Submission Draft Local Plan has therefore not been Positively Prepared and is Unsound, for the reasons set out below.

Appendix 7 of the Submission Draft Local Plan presents a schedule of policies to be superseded or deleted and Saved Policy ECON.7 ‘Safeguarding Rail-Based Industry at Theale’ is to be replaced by Draft Policy DM43 ‘Theale Rail-road Transfer Site’. Draft Development Management Policy DM43 is reproduced below:

> see Policy DM43 text in attached document - PSPconsulting obo Beftonforth Ltd REDACTED <

Saved Policy ECON.7, and supporting lower case text, are reproduced in Section 2 above. The first sentence of Draft Policy DM43 is equivalent to Saved Policy ECON.7. There is no second sentence in Saved Policy ECON.7.

The lower case text from Saved Policy ECON.7, paragraph 4.11.1, explains that transferring goods from rail to road is a *“special use which needs to be protected due to the shortage of appropriate sites for such facilities across West Berkshire”*.

Paragraph 4.11.3 then embraces the prospect of extending the Theale Railhead and states that *“any extension to the area designated under Policy ECON.7 would therefore be subject to the following factors: (a) a demonstrated need for expansion of the rail-based industries; (b) the scale and intensity of the proposed development and its wider environmental impact; (c) its impact upon the existing residential properties which are in proximity, in particular, in terms of noise, traffic and visual intrusion; (d) the scale and nature of environmental and landscape improvements; (e) the provision of satisfactory access”*.

In moving forward from Saved Policy ECON.7, the December 2020 Regulation 18 Draft Local Plan includes the Theale Railhead site under Draft Policy DC31, with the same policy wording as Draft Policy DM43 above. However, the Regulation 18 draft Local Plan at paragraph 12.12 states that *“Theale is the only location which offers road-rail transfer facilities in the area. As a result, it is important to the local economy that this continues to be protected and grows”*. This is a helpful acknowledgement of the potential for growth of the Theale Railhead consistent with National and Local Policy, however, this paragraph has been omitted from the Regulation 19 Draft Local Plan.

Unfortunately, neither the Regulation 18 Draft Local Plan nor the Regulation 19 Draft Local Plan, bring forward paragraph 4.11.3 from Saved Policy ECON.7. The dropping of paragraph 4.11.3 is, in itself, a fundamental omission, and this is compounded by the removal of the Theale Railhead ‘protected and grows’ paragraph 12.12 between the Regulation 18 and the Regulation 19 versions of the Draft Plan.

The removal of these growth provisions, which are entirely consistent with current National and Local Policy, demonstrates that the Regulation 19 Draft Local Plan has not been positively prepared; in fact, it has been negatively prepared. Draft Policy DM43 is thus fundamentally Unsound. The Council have, unreasonably and without evidence or justification, removed statements that should properly have been brought forward into the Regulation 19 Draft Local Plan and as a result this would close down the opportunities for the growth of inherently sustainable and policy compliant rail-road development at Theale.

The **West Berks Minerals & Waste Local Plan (MWLP)**, adopted in December 2022, recognises the strategic importance of the existing railhead sites within the District, which are safeguarded under MWLP Policy 9. The MWLP ‘Vision’ is *“to plan for the delivery of mineral resources and waste management*

capacity in locations which meet the needs of West Berkshire in the most sustainable way, and taking into account climate change". This of course applies equally to freight as it does to minerals and waste.

The MWLP notes at paragraph 4.8 that the NPPF "has a presumption in favour of sustainable development at its heart. Therefore, the Council's plan is based upon this principle as demonstrated by the vision, objectives and policies of the plan". This leads directly to MWLP Policy 22 'Transport' which confirms that "Sustainable modes of transport will be encouraged, in particular the use of rail and/or water where this is practicable and aligned to other policies in the plan".

The MWLP contemplates growth in the use of rail transport at paragraph 5.57 "While there may be some scope for growth, the level of growth is partly constrained by the capacity on the rail network itself and providing new siding sites can be very costly". The logical conclusion of this statement is that expanding existing rail sidings sites, such as the Theale Railhead, is sustainable and cost effective.

Following the adoption of the MWLP in December 2022, the West Berks Policies Map was updated and an extract of the December 2022 Policies Map for Theale is below:

> see map on pg 11 of attached document - PSPconsulting obo Beftonforth Ltd REDACTED >

The West Berks Consultation **Draft Local Transport Plan (LTP4)** was published in the second week of February for public consultation until the 22nd March 2023. To support sustainable growth, Draft LTP4 at paragraph 5.12 identifies "four objectives to support sustainable growth, including carbon neutral development which means new development should not add to current carbon challenge". And at paragraph 5.13, "The movement of people, goods and services in and through the district is vital to the economy and the LTP aims to protect and enhance strategic connectivity. Alongside this the LTP will support improving freight, including the transition to more sustainable modes and the management of freight in and through urban centres".

The Draft LTP4 Strategic Connections Strategy identifies enhancements to improve 'sustainable access for all'; 'decarbonising transport'; and 'support sustainable growth'. One of two enhancements to support sustainable growth includes the Theale Strategic Rail Freight Depot. Rail freight provides a faster, greener, safer and more efficient way of transporting goods than by road. Movement of freight by rail contributes to the economy and plays a big part in reducing congestion and carbon emissions.

The Draft LTP4 Strategic Rail Freight Depot is consistent with the Draft Strategic Investment Plan for the South East; initially published for public consultation in June 2022, with a final draft of the Strategic Investment Plan approved in November 2022. The Strategic Investment Plan sets out proposals for strategic transport investment for the next 30 years. The Theale Strategic Rail Freight Terminal is identified at Ref O18 in the extract from the Strategic Investment Plan below:

> see table on pg 12 of attached document - PSPconsulting obo Beftonforth Ltd REDACTED <

Network Rail are an active member of the Partnership Board who are responsible for the preparation of the above Strategic Investment Plan. As explained in their representations to the Regulation 19 Proposed Submission Draft Local Plan, Network Rail have identified for some time the opportunity for an intermodal interchange/strategic rail freight depot at Theale. The locational advantage (ie the 'gap' to be filled) is clearly illustrated by the extract below from Network Rail's map of Intermodal Rail Terminals.

Network Rail representations explain that their operational and technical assessments have identified the land to the west of Wigmore Lane as the most appropriate site to expand rail freight and rail-road transfer operations. Network Rail have confirmed that there are no alternative sites in Theale or in West Berkshire, or in this part of the region, that could accommodate an intermodal interchange/strategic rail freight depot.

> see map on pg 13 of attached document - PSPconsulting obo Beftonforth Ltd REDACTED <

In summary, Beftonforth firmly believe that the Regulation 19 Proposed Submission Draft Local Plan must include the opportunity for the expansion of rail- road transfer facilities at Theale. With respect to Draft Policy DM43, to ensure consistency with National and Local Policy, the Regulation 18 paragraph 12.12 should be reinstated and Saved Policy ECON.7 paragraph 4.11.3 should be brought forward and included in the Submission Draft Local Plan. Without these changes Draft Policy DM43 is Unsound. With the above changes, Draft Policy DM43 would be Sound.

As set out in Section 4 of these representations, the Required Changes to the Regulation 19 Proposed Submission Draft Local Plan, to make the Plan Sound, have been agreed with Network Rail and the Englefield Estate.

It could, of course, reasonably be argued that the current drafting within the Regulation 19 Proposed Submission Draft Local Plan does not prevent the growth of the Theale Railhead and paragraph 4.9 of the Submission Draft Local Plan is clear that "..... transport linkages, by rail and road are vital". Beftonforth understand, from First Plan discussions with Officers, that any perceived changes in emphasis with regard to support for the growth of the Theale Railhead were not intentional. However, the removal of references to growth and the failure to expressly identify and support the potential for growth of rail freight at Theale, if not corrected, is considered to make this part of the Submission Draft Local Plan Unsound.

The failure to expressly identify and support the potential for growth of rail freight at the Theale Railhead has significant implications for the November 2022 Local Plan Review Sustainability Appraisal, which considers Draft Policy DM43 at Appendix 6.

The Sustainability Appraisal does not take account of or consider the potential for the growth of the Theale Railhead and therefore does not weigh the environmental advantages the increased movement of freight by rail offers and does not identify the positive effects that growth of the Theale Railhead would have on greenhouse gas emissions, sustainable transport and the local economy. It is Beftonforth's view

	<p>that the growth of the Theale Railhead should have been considered within the Sustainability Appraisal, addressing a wider range of Sustainability Appraisal objectives and more effectively supporting the delivery of sustainable development in West Berkshire.</p> <p>The NPPF is also clear in the context of preparing and reviewing plans and confirms at paragraph 31 that: <i>“the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take account relevant market signals”</i>. It is thus a significant omission from the Sustainability Appraisal that increased use of rail freight and growth of the Theale Railhead has been omitted.</p> <p>Appendix A contains a letter from Guy Bates, Head of Freight Development at Network Rail, to the Chief Executive at West Berks (dated the 22nd May 2022) and Appendix B contains a letter from Guy Bates to Beftonforth dated the 11th November 2022, both letters emphasising the sustainability credentials of rail freight and the importance of delivering rail freight development at Theale.</p> <p>In Section 3 of their representations submitted on behalf of the Englefield Estate, consultants, First Plan, have prepared a comprehensive review of the Planning Policy Context and Evidence Base for the Regulation 19 Proposed Submission Draft Local Plan, and Beftonforth support and commend this review to the Council.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>All as set out in detail in the Local Plan Review Documentation</p>
<p>4. Proposed Changes</p>	<p>Please refer to Section 4 of the accompanying statement prepared by PSP on behalf of Beftonforth Ltd – Ref PER109 Dated March 2023.</p> <p>SECTION 4 - REQUIRED CHANGES TO MAKE THE PLAN SOUND</p> <p>With reference to Response Form Question 2, in the absence of any wording in the Regulation 19 Submission Draft Local Plan expressly supporting the growth of the Theale Railhead, and with wider omissions with respect to the Spatial Strategy, Climate Change Policy and Transport Policies, the Submission Draft Local Pan is not considered to meet the tests of Soundness for the reasons identified above and summarised below:</p> <p>The Submission Draft Local Plan is not positively prepared since it does not respond to identified need and it does not facilitate sustainable development in accordance with National and Regional Policy.</p> <p>The Submission Draft Local Plan is not justified since it fails to deliver an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives.</p> <p>There is no clear audit trail as to why this approach has been adopted and changed from the adopted Development Plan and from earlier stages of the current Local Plan Review. The Sustainability Appraisal fails to consider the increased use of rail freight consistent with National and Local Policy, when the evidence points to the need to support the growth in rail freight provision. The Sound approach and reasonable alternative would be to provide supporting text which supports the growth of rail freight at Theale and to have this expressed within the Policy itself.</p> <p>The Submission Draft Local Plan is not Consistent with National Policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site-specific considerations of the Theale Rail-Road Transfer Site under Policy DM43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.</p> <p>Changes required to make the West Berkshire Regulation 19 Proposed Submission Draft Local Plan Sound</p> <p>With reference to Response Form Question 4 changes have been identified below which are considered necessary to make the Submission Draft Local Plan Sound. The changes are required to ensure that the Submission Draft Local Plan is positively prepared, justified, and consistent with National Policy.</p> <p>To address the concerns raised in these representations with regard to Soundness, and specifically the failure of the Submission Draft Local Plan to appropriately identify and support modal shift in the context of the movement of freight, changes are sought below with respect to spatial strategy, climate change and transport policies. Additionally, in site specific terms, express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan ‘Sound’ are shown below in red underline or strike through.</p> <p>It is confirmed that the schedule of required changes set out below, has been jointly drafted and agreed between Network Rail, Beftonforth and the Englefield Estate.</p> <p>(g) Policy DM43, Theale Rail-road Transfer Site</p> <p>“The rail-road transfer site at Theale is reserved solely for those industries which require a rail-road transfer facility and access to the highway network.</p> <p>Redevelopment for any uses not expressly for this purpose will not be permitted.</p>

	<p><u>Expansion of the Theale Site to provide further rail-road transfer, in particular for the transshipment of consumer goods, will be supported subject to other policies in the Local Plan.”</u></p> <p>(h) Policy DM43, Supporting Text (para 12.101 and new para 12.102)</p> <p>12.100 The rail-road transfer site at Wigmore Lane, Theale, is an important infrastructure facility within the District allowing for the transfer of goods from rail to road. The facility is primarily an aggregates terminal and the Minerals and Waste Local Plan (2022-2037) safeguards the site to ensure the supply of minerals and the continued export of minerals from the District by road. Any non-mineral and waste development on the site would need to comply with Policy 9 of the Minerals and Waste Local Plan</p> <p>12.101 Nonetheless, transport of consumer goods by rail continues to be important for the local economy and <u>West Berkshire and Reading are a significant consumer market. Theale is the only location which offers road-rail transfer facilities in the area and there is an identified shortage of appropriate sites for such facilities across West Berkshire and the South East.</u>†The Theale Site should be protected for those industries which require a rail-road transfer facility and access to the network. <u>The growth and expansion of the Theale Site to support additional and diversified transport of goods by rail will be supported in principle. Land west of Wigmore Lane is in particular identified as having the potential to accommodate expansion of the existing facility and meet identified need for the transport of consumer goods by rail.</u> National Local Plan and Local Transport Plan policies support modal shift from road to more sustainable means of transport subject to environmental and transport considerations.</p> <p><u>12.102 Any extension to the area designated under Policy DM43 would be subject to other policies in the Local Plan and the following factors: (a) a demonstrated need for the expansion of the road-rail transfer site; (b) the scale and intensity of the proposed development and its wider environmental impact; (c) its impact upon existing residential properties which are in proximity, in particular in terms of noise, traffic and visual intrusion; (d) the scale and nature of environmental and landscape improvements; (e) the provision of satisfactory access.</u></p> <p>12.102₃ The extent of the rail-road transfer site is defined on the Policies Map.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	To explain in detail to the Inspector, the importance of the Local Plan Review including the opportunity for the growth of rail freight at the Theale Railhead.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Network Rail
<p>Consultee Full Name</p>	Ms Lisa Bullock
<p>Consultee Organisation</p>	Network Rail
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1094
<p>Chapter / Policy / Appendix Number</p>	Policy DM 43
<p>Chapter / Policy / Appendix Title</p>	Theale Rail-road Transfer Site

Order	201
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:13:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>1. Theale Rail-Road Transfer Site</p> <p>a) Relevant Context</p> <p>Our response to the LPR is made in the context of key policy drivers to increase the movement of freight by rail and to ensure that any future development does not impact on the operational railway.</p> <p>Rail freight is vital to Britain's economic success. It contributes to the economy and plays a significant role in reducing congestion and carbon emissions. Rail freight provides a faster, greener, safer and more efficient way of transporting goods than roads. It is an indispensable part of the British economy, and an essential component in supporting economic recovery and long-term sustainable growth.</p>

Rail freight has seen significant growth over the last 20 years, particularly those involving intermodal and construction materials. Despite this growth, rail freight's overall market share amongst all commodities transported sits at around roughly 9% leaving much room for growth. The surge in recent years in the construction sector has seen considerable uplift in construction material volumes with demand for materials in the Southeast a particular driver.

Future freight growth forecasting has highlighted considerable expected continued growth across rail freight commodities which in turn is factored into Network Rail's strategic planning framework.

Critical to the growth of rail freight is a wider Government and societal commitment to modal shift. As such one of the core commitments for freight in the 'Plan for Rail' (and the Transport Decarbonisation Plan) is that the Government will set a rail freight growth target.

The Great British Railways Transition Team (GBRTT) is developing a range of rail freight growth targets to support the development of rail freight across Great Britain. The target has been mandated by Government, with a recent address by the Secretary of State for Transport outlining the importance of setting a long-term freight growth target for rail.

The rail freight growth target will act as a catalyst for investment in the rail freight sector by setting a clear ambition for growth and modal shift to rail. It will help to highlight the role of freight on the rail network, giving confidence to the sector's customers and investors.

This growth would decarbonise the nation's logistics chains and get lorries off roads and generates approximately 76% less carbon emissions compared to HGVs per tonne of goods transported.

It is Network Rail and the government's intention to increase the use of rail freight to hit national decarbonisation targets and achieve net-zero. Given the finite number of rail freight sites nationwide and in line with government policy objectives around achieving net-zero carbon emissions by 2050; Network Rail is wholly supportive of development of facilities on third party owned rail-served sites to maximise modal-shift; enabling goods to pass by rail in lieu of long-haul HGV movements.

By way of illustration of the modal shift potential, a single typical contemporary bulk materials freight train would displace some 70+ HGVs from national and regional trunk roads.

In this context the Theale Rail-Road Transfer Site, as identified on the currently adopted West Berkshire Core Strategy Policies Map and under Saved Policy ECON.7, Safeguarding Rail-Based Industry at Theale, is a key rail freight site serving the region. Its proposed continued identification on the existing Rail-Road Transfer Site on the LPR Policies Map and by Draft Policy DM43, Theale Rail-Road Transfer Site, is fully supported.

Currently the Theale Rail-Road Transfer Site is primarily a rail aggregates and cement terminal, and this traffic will continue to grow. Critically the last remaining undeveloped parcel of land within the rail freight site comprises land in the ownership of Beftonforth with whom Network Rail are currently working to secure further rail served development supported by a new access road and new rail sidings. It is expected that the new rail sidings will be used to import aggregates and Network Rail Operational Division have confirmed that the Beftonforth land would have a likely maximum capacity of 375,000 tonnes of aggregates per annum. This will secure significant sustainability and environmental benefits.

It is important to recognise that consumer goods traffic by rail is also growing rapidly and is now the largest single commodity on Britain's railways at 40% of all volume. West Berks and Reading is a major consuming area for these goods and there is significant interest in using rail to transport consumer goods into the area. Indeed the LPR at paragraph 12.101 itself confirms that transport of consumer goods by rail continues to be important for the local economy.

A rail industry led (GBRTT) national review of potential Intermodal Rail freight Interchange (IRFI) sites was undertaken in Spring 2022. This worked through a sequence of a) existing operational sites, b) non-operational sites with existing main line connections, c) sites with previous main line connections, and d) other sites with potential merit in terms of location and accessibility by rail. The overall objective was to identify a future pipeline of sites able to provide additional capacity in the event of existing Intermodal or Strategic Rail Freight Interchange facilities being exhausted, and/or where no material capacity exists at present to serve particular regions or sub-regions (e.g. South West or South-East).

From an original long list of over 600 sites nationally, the high-level search for suitable locations for IRFI identified only 4 sites following the first sift, within the South East. Of these land west of Wigmore Lane (and west of the existing Theale Rail-Road Site) has been identified as the only site capable of serving the western end of the region. The assessment concluded that scope existed to create an intermodal facility, subject to land availability (land is not in the ownership of the rail industry) and flood risk mitigation.

Network Rail Operational Division and Engineering Team have looked in detail at all exiting rail sidings at Theale and their relationship to the mainline and regional railway lines, and they have concluded that the only site that can accommodate an IRFI is the land west of Wigmore Lane.

On this basis, Network Rail has subsequently engaged with Englefield Estate, the owners of the land west of Wigmore Lane with a view to investigating the key potential the land offers to secure modal shift from road to rail and meet identified demand for further rail served development in this location. As a result NR and the Estate are working jointly to review development options for the land in particular in terms of operationally suitable options for the delivery of necessary sidings infrastructure. The proposals are at an early stage and at the appropriate time will need to be reviewed via preapplication consultation with West Berkshire, be subject to detailed design development and full assessment as part of a formal planning application. Initial engagement has also been had with West Berkshire Council in respect of the potential this site offers in rail freight terms.

It is further confirmed that Network Rail, Englefield Estate and Beftonforth have agreed to work together to ensure that any rail-based development of the allocated Beftonforth land will not impact on the potential future development of land west of Wigmore Lane particularly the design of the new rail sidings, which will not prejudice or preclude the opportunity to extend the rail sidings westwards to allow for the expansion and growth of the existing Rail-Road Transfer site..

The following joint statement is agreed between the three parties:

It is confirmed that Network Rail, Bectonforth and Englefield Estate have been liaising with regard to the Bectonforth proposals and Network Rail's identification of the potential that land west of Wigmore Lane offers for expansion. It is understood by all parties that growth of the existing Theale Rail-Road Transfer Site will require close working between the three parties and that connection to the main line for land west of Wigmore Lane would ideally be taken via the Bectonforth Land.

All parties are committed to working jointly to ensure that development of the Bectonforth land is brought forward for rail freight use in accordance with the current Development Plan and that the potential for the future growth of rail freight provision at Theale on land west of Wigmore Lane is safeguarded and protected.

There is agreement that the provision for future rail expansion must be taken into consideration and all siding designs on the Bectonforth land will not fetter further rail connections to the west (land west of Wigmore Lane).

There is further agreement between NR and Englefield Estate that:

Rail connection of land west of Wigmore Lane could potentially be provided direct to the main line.

Expansion of rail freight development on land west of Wigmore Lane will give rise to a requirement to reduce risk at the pedestrian crossing of the GWR main line to the southeast of the proposed expansion site. This will require the provision of a footbridge

Englefield Estate and Bectonforth are making their own representations to the Local Plan Review which, amongst other things, reflect the above position as relevant to each party. The representations made by Englefield Estate and Bectonforth provide further detailed consideration of their respective sites and relevant planning considerations in the context of the LPR. It is confirmed that NR are fully supportive of the respective representations made and are in agreement in particular with regard to points of objection raised, points of soundness identified and required changes.

In summary, given Theale is the only location identified as being available to provide for additional transfer of freight from road to rail to serve this part of the South East region it is critical that capability for this to grow continues to be supported in the LPR. This is alongside continued support for aggregates traffic within the existing Theale Rail-Road Transfer Site. The following specific comments in the context of the Theale Rail-Road Transfer Site, potential for expansion and growth and wider policy support for movement of freight by rail are provided for completeness but should be read in conjunction with the representations made by Englefield Estate and Bectonforth.

b) Response to Draft Policies Map and Policy DM43 – Theale Rail-Road Transfer Site

Identification of the full extent of the existing Theale Rail-Road Transfer Site on the draft Policies Map is fully supported as is the proposed Draft Policy DM43 which continues to reserve the site solely for those industries which required a rail-road transfer facility and access to the highway network. Identification and safeguarding of such sites is as required by national policy (NPPF).

It is noted that the Regulation 18 Consultation (December 2020) included supporting text to then Draft Policy DC31 (Now Policy DM43) which signposts the potential for 'growth' of the Theale Rail-Road Transfer Site and the importance of this. Specifically supporting paragraph 12.12 was clear that:

"...Nonetheless, transport of consumer goods by rail continues to grow and West Berkshire and Reading area significant consumer market. Theale is the only location which offers road-rail transfer facilities in the area. As a result, it is important to the local economy that this continues to be protected and grows".

This approach reflects to a large extent the approach in the currently adopted Local Plan (Policy ECON.7 and supporting Text) and accords with the adopted Local Transport Plan and is consistent with National Policy requirements. Objection is raised to the removal at Regulation 19 stage to references to 'growth' in supporting text to Policy DM43.

There was certainly no expectation on the part of NR that the position, in terms of references to growth of the Theale Rail-Road Transfer Site, would significantly alter between Regulation 18 and Regulation 19 stage. It is acknowledged that the potential of land west of Wigmore Lane specifically to allow for expansion and growth of the existing Theale Rail-Road Transfer Site was not identified at Regulation 18 stage either by NR or the landowner. However, in the intervening period of more than two years since the last Regulation 18 consultation NR has identified the clear potential that land West of Wigmore Lane offers, underpinned by policy based need and identified demand, and as confirmed has been progressing early discussion, review and assessment of the potential the land offers both with West Berkshire Council and the landowner Englefield Estate.

It would appear from informal engagement with the West Berkshire Policy Team that the implications of the redrafting and any perceived changes in emphasis with regard to support for 'growth' of the Theale Rail-Road Transfer Site were not intentional. It is understood that the changes at Regulation 19 stage were intended to bring it more into line with the Minerals and Waste Plan. Certainly the amendments do not make any statement to the effect that growth is not supported and do not in themselves preclude growth of the site. Notably the importance of transport of consumer goods by rail in terms of it continuing to be important for the local economy continues to be referenced. It is appreciated that the implication of the redrafting in terms of removing references to growth may not have been fully considered. However, the removal of references to growth and the failure to expressly identify and support the potential for growth of rail freight at Theale, if not corrected, is considered to make this part of the LPR unsound.

The NPPF is clear in the context of preparing and reviewing plans and confirms at paragraph 31 that:

"the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take account relevant market signals".

The relevant and up-to-date evidence base is that there is a need to ensure that expansion and growth of rail freight at Theale is supported. Critically, there are no other locations where this need could be met within the West Berkshire area and indeed beyond the LPR area. Land has been identified by NR with potential to accommodate expansion of rail freight provision at Theale and is being jointly proposed with the landowner. It is considered that it would be unsound if the potential for expansion of the existing Theale Transfer Site were not appropriately referenced and supported in the West Berkshire Local Plan. This would reflect how expansion of the Theale site is referenced and supported in the currently adopted Local Plan policy and supporting text and in more general terms in the Local Transport Plan. There has been no material change in circumstances since the current Local Plan and Local Transport Plan documents were adopted which would justify a different approach being taken. If anything the declaration of a climate change emergency and the role sustainable transfer of goods by rail has to play in that context only serves to underpin the increased need to ensure growth of rail freight at Theale is supported. There is a clear policy drive both at National, Regional and Local Transport Plan level (and notably in the emerging Local Transport Plan recently issued for consultation) to shift freight from road to rail (or other sustainable means of transport) and a clear imperative to support sites which can support sustainable transport of freight in coming forward.

If the LPR fails to continue the same policy approach as has been historically in place (and remains in place to date) i.e. that potential for growth is expressly identified, then it is considered to fail to accord with the requirement at Paragraph 11 of the NPPF to apply a presumption in favour of sustainable development. For plan-making this means, amongst other things, that all plans should promote a sustainable pattern of development. It is also considered to be an unduly inflexible approach. This inflexibility is contrary to the NPPF, paragraph 32 (d), which requires, in the context of building a strong, competitive economy, that planning policies should be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

It is relevant that in the context of promoting sustainable transport the NPPF, para 106 (c) require that planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. At paragraph 106 (e) there is a requirement for planning policies to provide for any large scale transport facilities that need to be located in the area. This is to be read together with the requirements at paragraph 83 that planning policies should recognise and address the specific locational requirements of different sectors and for storage and distribution operations at a variety of scales and in suitably accessible locations. The LPR as currently drafted is not consistent with any of these National policy requirements.

In the context specifically of promoting sustainable transport, and the soundness tests and key requirements, the LPR should be identifying and supporting sites and routes where infrastructure could be developed to widen transport choice and linked to the Local Transport Plan (adopted and emerging).

c) Comments on other draft LPR Policies (SP1/SP5/SP23/DM42 and supporting text.

>See each consultation point for details.<

d) Consideration of Tests of Soundness

By reference to **Response Form Question 2**, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:

- **The Plan is not positively prepared** – it does not respond to identified need and it does not facilitate sustainable development.

- **The Plan is not justified** – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.

- **The Plan is not Consistent with National Policy** – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.

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

- * Yes
- * No

<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p><i>e) Changes required to make the West Berkshire Proposed Submission (Reg 19) Local Plan Sound</i></p> <p>By reference to Response Form Question 4 changes are identified as being required to make the West Berkshire Proposed Submission Local Plan sound. Specifically, the changes are required to ensure the plan is positively prepared, justified, and consistent with National Policy.</p> <p>To address the concerns raised with regard to soundness and specifically the failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes are sought in the context of spatial strategy, climate change and transport policies. Additionally, in site specific terms express support for growth of the Rail-Road Transfer Site at Theale is sought. The specific changes required to make the plan 'sound' are as follows: (Changes required shown in red underlined/struck through). It is confirmed that the schedule of required changes has been jointly drafted and agreed between NR, Beftonforth and the Englefield Estate.</p> <p>Schedule of Required Changes</p> <p>(g) Policy DM43, Theale Rail-road Transfer Site</p> <p>"The rail-road transfer site at Theale is reserved solely for those industries which require a rail-road transfer facility and access to the highway network.</p> <p>Redevelopment for any uses not expressly for this purposes will not be permitted.</p> <p><i>Expansion of the Theale Site to provide further rail-road transfer, in particular for the transshipment of consumer goods, will be supported subject to other policies in the Local Plan."</i></p> <p>(h) Policy DM43, Supporting Text (para 12.101 and new para 12.102)</p> <p>12.100 The rail-road transfer site at Wigmore Lane, Theale, is an important infrastructure facility within the District allowing for the transfer of goods from rail to road. The facility is primarily an aggregates terminal and the Minerals and Waste Local Plan (2022-2037) safeguards the site to ensure the supply of minerals and the continued export of minerals from the District by road. Any non-mineral and waste development on the site would need to comply with Policy 9 of the Minerals and Waste Local Plan</p> <p>12.101 Nonetheless, transport of consumer goods by rail continues to be important for the local economy and <i>West Berkshire and Reading are a significant consumer market. Theale is the only location which offers road-rail transfer facilities in the area and there is an identified shortage of appropriate sites for such facilities across West Berkshire and the South East.</i> The Theale Site should be protected for those industries which require a railroad transfer facility and access to the network. <i>The growth and expansion of the Theale Site to support additional and diversified transport of goods by rail will be supported in principle. Land west of Wigmore Lane is in particular identified as having the potential to accommodate expansion of the existing facility and meet identified need for the transport of consumer goods by rail. National Local Plan and Local Transport Plan policies support modal shift from road to more sustainable means of transport subject to environmental and transport considerations.</i></p> <p>12.102 <i>Any extension to the area designated under Policy DM43 would be subject to other policies in the Local Plan and the following factors: (a) a demonstrated need for the expansion of the road-rail transfer site; (b) the scale and intensity of the proposed development and its wider environmental impact; (c) its impact upon existing residential properties which are in proximity, in particular in terms of noise, traffic and visual intrusion; (d) the scale and nature of environmental and landscape improvements; (e) the provision of satisfactory access.</i></p> <p>12.1023 The extent of the rail-road transfer site is defined on the Policies Map.</p> <p>Early discussion with West Berkshire Council with regard to the representations made and suggested changes would be welcomed.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Englefield Estate (Represented by Savills)
Consultee Full Name	Englefield Estate
Consultee Organisation	Englefield Estate Office
Agent Full Name	Vilna Walsh
Agent Organisation	Firstplan
Comment ID	PS745
Chapter / Policy / Appendix Number	Policy DM 43
Chapter / Policy / Appendix Title	Theale Rail-road Transfer Site
Order	201
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 15:46:00
Attached Files	Firstplan (Englefield Estate) Appendix 1.pdf Firstplan (Englefield Estate) Appendix 2.pdf Firstplan (Englefield Estate) Appendix 3.pdf Firstplan (Englefield Estate) Appendix 4.pdf Firstplan (Englefield Estate) Appendix 5.pdf Firstplan (Englefield Estate) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	No comment
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable	Yes

<p>over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>Extract of Full Representation relevant to consultation point (for full rep see attachments)</i></p> <p>It is noted that the existing Theale Rail-Road Transfer Site, including the Bectonforth land, continues to be identified on the draft LPR Policies Map for its rail freight functions as well as under Draft Policy DM43. This approach is fully supported.</p> <p>The Regulation 18 consultation (December 2020) included wording which signposted the potential for 'growth' of the Theale Rail-Road Transfer Site and the importance of this. This reflects, to a large extent, the approach in the currently adopted Local Plan (Policy ECON.7 and supporting text) and accords with the adopted Local Transport Plan and is consistent with National Policy requirements.</p> <p>It is understood that there was no expectation on the part of NR that the position, in terms of references to growth of the Theale Rail-Road Transfer Site, would significantly alter between Regulation 18 and Regulation 19 stage. It is acknowledged that the potential of land West of Wigmore Lane specifically to allow for expansion and growth of the existing Theale Rail-Road Transfer Site was not identified at Regulation 18 stage either by NR or the landowner. However, in the intervening period of two years since the last Regulation 18 consultation NR has been working to deliver the final parcel of land within the currently allocated 'Rail Industry Theale' site in the Core Strategy and under saved Policy ECON.7. In addition in that period NR has critically identified the clear potential that land West of Wigmore Lane offers, underpinned by policy based need and identified demand, and has been progressing early discussion, review and assessment of the potential the land offers both with WBC and the landowner Englefield Estate.</p> <p>As already acknowledged, it would appear that the implications of the redrafting and any perceived changes in emphasis with regard to support for 'growth' of the Theale Rail-Road Transfer Site were not intentional. It is understood that the changes at Regulation 19 stage were intended to bring it more into line with the Minerals and Waste Plan. Certainly the amendments do not make any statement to the effect that growth is not supported and do not in themselves preclude growth of the site. Notably the importance of transport of consumer goods by rail in terms of it continuing to be important for the local economy continues to be referenced. It is appreciated that the implication of the redrafting in terms of removing references to growth may not have been fully considered. However, the removal of references to growth and the failure to expressly identify and support the potential for growth of rail freight at Theale, if not corrected, is considered to make this part of the LPR unsound.</p> <p>It is entirely relevant that if transport of consumer goods, as identified by the Regulation 19 Plan as continuing to be important for the local economy, is to grow then this can only realistically be achieved if the existing Theale Rail-Road facility grows. The existing freight site does not currently provide for transfer of consumer goods and primarily supports rail carriage of minerals and fuel which as confirmed by NR is itself expected to grow. Indeed, as detailed, the last remaining undeveloped parcel of land (the Bectonforth land) is in the process of being brought forward for development for the transfer of aggregates.</p> <p>Across the LPR there are also concerns that opportunities for policies to support sustainable development and specifically to encourage modal shift (to ensure the plan is positively prepared and consistent with national policy) have not been included. This again raises issues of soundness.</p> <p>The NPPF is clear in the context of preparing and reviewing plans and confirms at paragraph 31 that: <i>"the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take account relevant market signals"</i>.</p> <p>The relevant and up-to-date evidence base is that there is a need to ensure that expansion and growth of rail freight at Theale is supported. Critically, there are no other locations where this need could be met within the West Berkshire area and indeed for some significant distance beyond the LPR area. Land has been identified by NR with potential to accommodate expansion of rail freight provision at Theale and is being jointly proposed with the landowner. It is considered that it would be unsound if the potential for expansion of the existing Theale Transfer Site were not appropriately referenced and supported in the West Berkshire Local Plan. This would reflect how expansion of the Theale site is referenced and supported in the currently adopted Local Plan policy and supporting text and in more general terms in the Local Transport Plan. There has been no material change in circumstances since the current Local Plan and Local Transport Plan documents were adopted which would justify a different approach being taken. If anything the declaration of a climate change emergency and the role sustainable transfer of goods by rail has to play in that context only serves to underpin the increased need to ensure growth of rail freight at Theale is supported.</p>

There is as detailed in the policy and evidence base review, at Section 3 of this Statement, a clear policy drive both at National, Regional and Local Transport Plan level (and notably in the emerging LTP4 at time of writing subject to consultation) to shift freight from road to rail (or other sustainable means of transport) and a clear imperative to support sites which can support sustainable transport of freight in coming forward.

If the LPR fails to continue the same policy approach as has been historically in place (and remains in place to date) i.e. that potential for growth is expressly identified, then it is considered to fail to accord with the requirement at Paragraph 11 of the NPPF to apply a presumption in favour of sustainable development. For plan-making this means, amongst other things, that all plans should promote a sustainable pattern of development. It is also considered to be an unduly inflexible approach. This inflexibility is contrary to the NPPF, paragraph 32 (d), which requires, in the context of building a strong, competitive economy, that planning policies should be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.

It is relevant that in the context of promoting sustainable transport the NPPF, para 106 (c) require that planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. At paragraph 106 (e) there is a requirement for planning policies to provide for any large scale transport facilities that need to be located in the area. This is to be read together with the requirements at paragraph 83 that planning policies should recognise and address the specific locational requirements of different sectors and for storage and distribution operations at a variety of scales and in suitably accessible locations. The LPR as currently drafted is not consistent with any of these National policy requirements.

The LPR as currently drafted is not consistent with NPPF requirements in terms of meeting the challenge of climate change (paragraphs 152-154). Neither is it consistent with wider national policy requirements in terms of encouraging modal-shift to of freight to rail in the context of the role it has to play in reducing emissions from the freight sector.

In the context specifically of promoting sustainable transport, and the soundness tests and key requirements, the LPR should be identifying and supporting sites and routes where infrastructure could be developed to widen transport choice and linked to the Local Transport Plan (adopted and emerging). The evidence base supports the fact that there are no sites in the West Berkshire area (and indeed for some significant distance beyond) where growth of rail freight provision could be accommodated other than at Theale and the clear policy need and market demand for such provision.

In non-site-specific terms the LPR policies in respect of spatial strategy, climate change and transport considerations also raise concerns in the context of the tests of soundness. The spatial strategy, climate change and transport policies should equally be consistent with National Policy requirements with regard to supporting and promoting sustainable transport.

By reference to **Response Form Question 2**, and in the absence of any wording in the LPR expressly supporting the growth of rail freight provision at Theale and wider omissions in respect of the Spatial Strategy, Climate Change Policy and Transport Policies, the LPR is not considered to meet the tests of soundness for the reasons identified above and summarised below:

- **The Plan is not positively prepared** – it does not respond to identified need and it does not facilitate sustainable development.
- **The Plan is not justified** – The Plan is not justified since it fails to be an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence. The approach of not including either policy or supporting text to identify and support the growth of rail freight at Theale is not the most appropriate strategy when considered against the reasonable alternatives. There is no clear audit trail as to why this approach has been adopted and changed from earlier stages. The Sustainability Appraisal does not appear to consider how a different approach (supporting growth) would perform. As such it is not clear that the SA has been able to robustly inform the content of the LPR. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.
- **The Plan is not Consistent with National Policy** – the LPR is not consistent with NPPF and other relevant national policy in particular with regard to: promoting a sustainable pattern of development; meeting the challenge of climate change; supporting sustainable transport (including supporting modal shift of freight from road to rail, wherever possible, to reduce emissions from the freight sector); and considering the specific locational requirements of different sectors in suitably accessible locations. The lack of consistency with National Policy is both in terms of site specific considerations of the Theale Rail-Road Transfer Site under Policy DM 43 and supporting text and more generally in respect of: Spatial Strategy Policy SP1, Climate Change Policy SP5, and Transport and Transport Infrastructure Policies SP23 and DM42.

Specific changes sought to the Regulation 19 Local Plan Review to ensure the Plan does meet the tests of soundness are provided at Section 5 of this Statement.

Attachments:

- Full Representation
- Appendix 1 - Expanding Rail Freight Facilities at Theale
- Appendix 2 - Transport Technical Note
- Appendix 3 - Flood Risk Technical Note
- Appendix 4 - LVA
- Appendix 5 - Rail Freight Group & UK Major Ports Group Paper

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	No comment
4. Proposed Changes	<p><Proposed Changes shows as underlined for additions and strikethrough for deletions></p> <p>Policy DM43, Theale Rail-road Transfer Site</p> <p>"The rail-road transfer site at Theale is reserved solely for those industries which require a rail-road transfer facility and access to the highway network.</p> <p>Redevelopment for any uses not expressly for this purposes will not be permitted.</p> <p><u>Expansion of the Theale Site to provide further rail-road transfer, in particular for the transhipment of consumer goods, will be supported subject to other policies in the Local Plan."</u></p> <p>Policy DM43, Supporting Text (para 12.101 and new para 12.102)</p> <p>12.100 The rail-road transfer site at Wigmore Lane, Theale, is an important infrastructure facility within the District allowing for the transfer of goods from rail to road. The facility is primarily an aggregates terminal and the Minerals and Waste Local Plan (2022-2037) safeguards the site to ensure the supply of minerals and the continued export of minerals from the District by road. Any non-mineral and waste development on the site would need to comply with Policy 9 of the Minerals and Waste Local Plan</p> <p>12.101 Nonetheless, transport of consumer goods by rail continues to be important for the local economy and West Berkshire and Reading are a significant consumer market. Theale is the only location which <u>offers road-rail transfer facilities in the area and there is an identified shortage of appropriate sites for such facilities across West Berkshire and the South East.</u> †The Theale Site should be protected for those industries which require a rail-road transfer facility and access to the network. <u>The growth and expansion of the Theale Site to support additional and diversified transport of goods by rail will be supported in principle. Land west of Wigmore Lane is in particular identified as having the potential to accommodate expansion of the existing facility and meet identified need for the transport of consumer goods by rail.</u> National, Local Plan and Local Transport Plan policies support modal shift from road to more sustainable means of transport subject to environmental and transport considerations.</p> <p><u>New Para. Any extension to the area designated under Policy DM43 would be subject to other policies in the Local Plan and the following factors: (a) a demonstrated need for the expansion of the road-rail transfer site; (b) the scale and intensity of the proposed development and its wider environmental impact; (c) its impact upon existing residential properties which are in proximity, in particular in terms of noise, traffic and visual intrusion; (d) the scale and nature of environmental and landscape improvements; (e) the provision of satisfactory access.</u></p> <p>12.102 The extent of the rail-road transfer site is defined on the Policies Map.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	<i>Response made raises significant issues with regard to the soundness of the plan if the proposed amendments are not made.</i>
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor

	Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1475
Chapter / Policy / Appendix Number	Policy DM 43
Chapter / Policy / Appendix Title	Theale Rail-road Transfer Site
Order	201
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	

* Yes * No	
Please give reasons for your answer	Vehicular access to the currently undeveloped southern part of the site (former builder's yard) could have an adverse impact on residents in Wigmore Lane
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	Policy should require that access to the currently undeveloped southern part of the site (former builder's yard) should avoid the residential part of Wigmore Lane
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Policy DM 44 Parking

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Read, Chris
Consultee Full Name	Chris Read
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS92
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	16/02/2023 16:50:00
Attached Files	PS89 and PS92 Chris Read_Redacted
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>1. No provision for large van based parking. The LPR has no provision to the parking of business vans which are extensively used as either transport to and from jobs allocated.</p> <p>There is a significant allocation (40%) of much needed social housing in the plan. However, there is a higher percentage of people who use vans for their own personal businesses or work of business that need vans to complete business (eg plumbing, building, drainage clearing, roofing etc) who occupy social housing. This is seen in all local West Berkshire developments with social housing (and in nearby towns of Reading, Oxford, and Basingstoke. The plan makes no mention of the provision of extra secure parking for large vans. This will result in vans being parked on grass verges, over pavements, public spaces etc. Vans that are not parked either securely (area CCTV) or close to the owners residence (within 10m) will be subject to break-in for tools etc. Any plan with a good and needed amount of social housing must make accommodation for the parking of vehicles that people rely on to complete their job or business (van based economy).</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Ridgepoint Homes Ltd</p>
<p>Consultee Full Name</p>	<p>Miss Emma Runesson</p>
<p>Consultee Organisation</p>	<p>Ridgepoint Homes Ltd</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS207</p>

Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	We support the inclusion of the reference to Building Regulations with regard to the provision of electric vehicle charging points. In regard to the parking standards, it is not physically possible to deliver 0.5 of space per unit in isolation and therefore the parking standards as drafted may cause confusion and ambiguity for developers. We suggest that additional commentary is included to specifically confirm that the delivery of a 0.5 space can be achieved through shared spaces. Alternatively the parking provision could be delivered on

	aggregate across a whole development i.e. 1 dwelling provided with 3 spaces and 1 dwelling provided with 2 spaces to equate to 2.5 spaces per unit overall. The commentary on Travel Plans is a duplicate of the wording of Policy DM45 so this should be deleted.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	We suggest that additional commentary is included to specifically confirm that the delivery of a 0.5 space can be achieved through shared spaces. Alternatively the parking provision could be delivered on aggregate across a whole development i.e. 1 dwelling provided with 3 spaces and 1 dwelling provided with 2 spaces to equate to 2.5 spaces per unit overall. The commentary on Travel Plans is a duplicate of the wording of Policy DM45 so this should be deleted.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hoddinott, Keith
Consultee Full Name	Keith Hoddinott
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS481
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Letter
Response Date	02/03/2023 13:28:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>When will planning officers and councilors recognize the obvious fact that residents want and need cars. In towns such as the size of Newbury, public transport cannot be as comprehensive and frequent as in a large city to support a comprehensive & frequent public transport system whereby commuters can expect a bus every 10 minutes (as in large cities such as London). In parts of Newbury, even a 30 minute service would be appreciated.</p> <p>The standard of 1.25 can per household is totally unrealistic. It is ironic that on estates built in the 1950's (such as Chestnut Crescent), when house holders probably had few cars, there is now plenty of space for off street parking (in most cases 3 or more), and that most properties actually have 3 or more vehicles. Contrast this with some modern estates, where the density is so intense & parking spaces limited to 2 or less, that parking has to be on the pavements and makes driving through hazardous. Of course, developers accede to these requirements, as they can increase the density of units. The social climate at the moment means that the majority of households need 2 or 3 cars. Even those who perhaps no longer drive will have visitors & social carers. The cost of acquiring a house/apartment/flat has meant that more households are multi-generational.</p> <p>It would be interesting to know how many officers, councilors, & developers have 2 or more vehicles!!</p> <p>With the high cost of housing, homes are becoming multi-generational, & several parking spaces are required (given the preponderance of vans etc. used by individuals working from home). The standards set are totally inadequate for current (& for-seeable) lifestyles, but eagerly accepted by developers as they can achieve higher densities of properties. It is disappointing that the proposals at Market Street did not encompass more underground parking .(1 did suggest this during the consultation meetings organized by the developers).</p>

	<p>In a country short of horizontal space, architects & engineers should think vertically to make the most efficient use of the horizontal area of the proposed development.</p> <p>I raise strong objections to the access via Warren Road, as this is unsuitable due to the exit from the school - imagine morning traffic with the school run combined with commuters from the development — a lethal accident waiting to happen involving school children!!!</p> <p>The proposed approx. 2,000 houses east of Thatcham & north of the A4 up to Bucklebury, not only raise local highway & environmental issues; but due to the topography pose particular flood risk & the requirement for extra capacity in sewers downstream & at the sewage treatment works in Lower Way.</p> <p>Development should be considered premature, & hence refused, until the capacity of the sewers & treatment works have been upgraded to accommodate the additional flows. This should prevent sewage spills during dry weather conditions.</p> <p>The proposed site south of the Thatcham Rail Station has some advantages. This is a brown field site with some potential toxic waste. Therefore, removal of this waste would eliminate the risk of leachate into the river/canal. The developer has proposed a bridge over the rail/river, which would address the general traffic flow problems.</p> <p>The site is adjacent to good rail links.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
Please give reasons for your answer	
4. Proposed Changes	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Pegasus Group)
Consultee Full Name	Mr Philip Simmons
Consultee Organisation	Donnington New Homes
Agent Full Name	Rebecca Humble
Agent Organisation	Pegasus Group
Comment ID	PS715
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking

Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:35:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Sandleford Park West (SPW)</p> <p>Policy DC36 – Parking: Objection is raised to this Policy as drafted because it excludes garages from being counted as part of parking provision on housing sites. No justification has been provided for this. Garages should be included where alternative storage space is provided on plot or within a garage of adequate dimensions for items such as bicycles. For comparison, BCP Council's "Parking Standards SPD" (adopted January 2021) allows garages to be counted as parking spaces where they meet minimum internal size requirements of 7m x 3.3m. Paragraphs 3.2.10 - 3.2.11 of this SPD state:</p> <p><i>"Research has shown that in many developments less than half of all garages are used for car parking, instead being used for storage. In terms of sizes, an internal minimum of 7m x 3.3m is considered appropriate to ensure that a large modern family car (eg SUV) will fit comfortably with a minimum circulation</i></p>

	<p><i>space to allow for some general storage which may include cycles... "This 7m x 3.3m must be a clear, unobstructed space to allow a vehicle to enter and exit safely. Garages must also have entrances wide and high enough to allow for large family cars.....Garages will only be counted as a parking space where they meet the minimum size requirements..."</i></p> <p>It is recommended that the Council takes this approach to the treatment of garages as parking spaces. Otherwise, to completely discount garages from every housing site's parking provision will have significant negative effects on the efficient use of land, contrary to Government guidance.</p> <p>The Policy also fails to acknowledge and allow for the valuable contribution that on-street car parking can make to parking provision on a site, particularly for visitors. It is considered that the Policy, as drafted, lacks sufficient detail to address these issues and that a new Parking SPD should be prepared and adopted by the Council to address this matter.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To make the relevant points before the Inspector and provide answers to any queries arising.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Union4 Planning Ltd
Consultee Full Name	Jonathan Rowlatt
Consultee Organisation	Union4 Planning Ltd
Agent Full Name	Jonathan Rowlatt
Agent Organisation	
Comment ID	PS654
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS	Web

* Web * Unknown	
Response Date	03/03/2023 11:36:44
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	The assessment of non residential parking provision on a case by case basis is strongly supported, given the significant variance in parking demand to different types of development. Efforts should be made to reduce parking and mimimse car joureys where possible
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it	

necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington New Homes (Represented by Turley)
Consultee Full Name	Donnington New Homes
Consultee Organisation	Donnington New Homes
Agent Full Name	Mr Tim Burden
Agent Organisation	Turley
Comment ID	PS1745
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 09:14:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	5.7 Policy DM44 'Parking' – We continue to object to the wording of this policy in that it excludes garages from being counted toward parking provision on residential sites. Garages should be included where alternative storage space is provided on plot or within a garage of adequate dimensions for items such as bicycles. Discounting garages as parking spaces will result in the ineffective use of land, contrary to the NPPF.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1334
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Object. The policy is inconsistent with national policy and not effective.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	<p>Proposed amendment 1</p> <p>For residential developments, the policy does not allow for site-specific circumstances to be taken into consideration contrary to Para 107 of NPPF. Para 57 states,</p> <p>“If setting local parking standards for residential and non-residential development policies should take into account: a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles”.</p> <p>The zoning system for residential development set out in Policy DM44 is intended to address this to some extent but it does not sufficiently provide for the individual circumstances of a site to be taken into consideration. Additionally, the removal of the ‘exceptional circumstances’ line below the minimum standards table suggests no flexibility which is a concern when dealing with minimum standards.</p> <p>Wording should be inserted into the policy after the minimum standards table to allow for agreement on a case-by-case basis, as follows :</p> <p><u>A reduced residential parking standard may be accepted for sites in sustainable locations deemed suitable by the Council and based on evidence presented by the applicant.</u></p> <p>In general, I would question the use of minimum standards. Setting maximums would help to ensure that developments continue to come forward with levels of parking provision that remain commensurate with the vision to reduce car dependency and to promote alternative sustainable transport options. Nevertheless, NPPF does state that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network or for optimising the density of development in city and town centres and other locations that are well served by public transport.</p> <p>Proposed amendment 2.</p> <p>The policy specifies that garages will not be counted as a parking spaces. There will, however, be circumstances where garages will be used for parking. To ensure the policy is justified and therefore sound, some flexibility should be introduced.</p> <p>The following amendment is proposed:</p> <p><u>Garages will not be counted as a car parking space for the purposes of meeting the required levels of parking set out in this policy.</u></p> <p><u>Garages will only be accepted as contributing towards parking provision for development if they have adequate functional space. Where garages are also used to provide cycle storage, additional space must be provided to accommodate this.</u></p> <p>Proposed amendment 3.</p> <p>For Zone 2 residential developments, the policy does not specify whether half spaces are the minimum spaces plus 1 unallocated space per X dwellings. This requires clarification in the policy wording.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Yes to explain the purpose of parking standards and the extent of variation from national policy, which makes the policy unsound.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	AWE (Represented by RPS)
Consultee Full Name	Mr John Steele
Consultee Organisation	AWE
Agent Full Name	Mrs Camilla Fisher
Agent Organisation	RPS
Comment ID	PS1201
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 13:27:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	Yes

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	It is understood that the 'Cycling and Motorcycling Advice and Standards for New Development' guidance document referred to within the policy does not currently exist and so it is not possible to advise if AWE consider the provision to be correct. However, providing AWE is consulted on the guidance document when it is produced then this is considered acceptable.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Review the use of 'travel activity' to be focussed on use of car, supporting travel activity by other sustainable modes. Flexibility should be included with regards to use of scooters should such become legal during the plan period
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Home Builders Federation

Consultee Full Name	Mark Behrendt
Consultee Organisation	Home Builders Federation
Agent Full Name	
Agent Organisation	
Comment ID	PS1696
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:54:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.	No

* Yes * No	
Please give reasons for your answer	The policy is unsound as it is unjustified and not consistent with national policy. The HBF is concerned that the wording in the third sentence of the third paragraph is amended could appear to decision makers that there will be times when development should go beyond building regulations. Building regulations clear sets out what is required with regard electric vehicle charging points for residential development and there is no need for a developer to go beyond these standards. We would therefore recommend that the words "and <i>where there are opportunities to go beyond minimum standards</i> " is deleted. This will ensure the policy is consistent with paragraph 16 of the NPPF in providing a clear and unambiguous policy.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To represent the views of our members
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1476
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web	E-Mail

* Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	No parking requirements for dwellings larger than 4-bedrooms are given. Otherwise, support policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	The parking requirements table should be expanded to cover at least 5-bedroom houses.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?	No

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sovereign Housing Association Ltd (Represented by Boyer Planning)
Consultee Full Name	Mr Matt Richardson
Consultee Organisation	Sovereign Housing Association Ltd
Agent Full Name	Mrs Michelle Quan
Agent Organisation	Boyer Planning
Comment ID	PS1629
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 18:32:00
Attached Files	Boyer obo Sovereign_Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	Furthermore, Sovereign considers that the Proposed Submission West Berkshire Local Plan Review (2022 – 2039), as currently formulated, is Legally Compliant.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	

<p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>DEVELOPMENT MANAGEMENT POLICIES</p> <p>The comments set out in this section are intended to assist the Council in developing an approach that is consistent with national planning policies and the tests of soundness. Some comments have been included to assist the Council in developing a series of policies that are both effective and robust. Where possible, suggested amendments have been set out in the response.</p> <p>Sovereign broadly supports the West Berkshire Local Plan Review (2022 - 2039). However, the comments set out below are intended to identify opportunities to improve the effectiveness of the proposed policies.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>Sovereign considers that in preparing the emerging local plan, the Council have sufficiently complied with the Duty-to-Cooperate.</p> <p><i>3. The Duty-to-Cooperate</i></p> <p>Section 33a of the Planning and Compulsory Purchase Act (2004) ('PCPA') requires that local planning authorities should co-operate with other relevant local authorities, the County Council, prescribed bodies, and other persons, in relation to the preparation of a Local Plan. The Duty requires the Council to engage constructively, actively, and on an on-going basis, in the preparation of the Plan, insofar as it relates to a strategic matter. Strategic Matters include the sustainable development and use of land that has, or would have, a significant impact on at least two planning areas, such as the amount and distribution of housing.</p> <p>Furthermore, the NPPF confirms, at paragraph 26, that government policy comprises that the effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. It goes on to confirm that, in particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular authority area could be met elsewhere. As such, cooperation clearly relates to maximising the effectiveness of plan preparation.</p> <p>Demonstrated within the effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG, Sovereign considers that the West Berkshire Local Plan Review is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> <p>Sovereign therefore considers that the Duty-to-Cooperate has been sufficiently demonstrated in the plan-making.</p>
<p>4. Proposed Changes</p>	<p>Policy DM44: Parking</p>

	<p>To ensure that the policy remains effective over the length of the plan period, it is recommended that additional wording is included to clarify that development proposals would be required to meet the most up to date standards where relevant:</p> <p>i) Cycle and motorcycle parking should be provided in accordance with the Council's 'Cycling and Motorcycling Advice and Standards for New Development', <u>or such other standards as may be prepared</u>. This sets out design standards and expected levels of provision for different types of development.</p> <p>[...]</p> <p>ii) The layout and design of parking spaces should follow the parking design guidance included within the Council's 'Highway Design Guidance for Residential Development', <u>or such other standards as may be prepared</u>, in order that good quality homes and neighbourhoods are created.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	Sovereign benefit from a specific land interest within West Berkshire District, which is proposed to be allocated for residential development under the emerging Policy RSA23: Land Adjoining The Haven, Kintbury. In representing Sovereign, Boyer are well-placed to advise on the appropriateness of the land allocated for development.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hathor Property Limited (Represented by Turley Associates)
Consultee Full Name	Fred Schiff
Consultee Organisation	Hathor Property Limited
Agent Full Name	Mr Simon Packer
Agent Organisation	Turley Associates
Comment ID	PS1676
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	03/03/2023 10:41:00
Attached Files	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>4. Comment on DM policies</p> <p>4.2 Policy DM44 'Parking' – we object to the wording of this policy in that it excludes garages from being counted toward parking provision on residential sites. Garages should be included where alternative storage space is provided on plot or within a garage of adequate dimensions for items such as bicycles. Discounting garages as parking spaces will result in the ineffective use of land, contrary to the NPPF.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	No
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes</p>	No

* No	
5. Independent Examination	Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1159
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	No

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	We welcome the Council's approach to assess the level of vehicular parking for non-residential developments to be judged on case by case basis. However, we have reservations about the proportionality of the requirement to provide for other ultra-low emission vehicles, car sharing spaces and car club vehicles.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	We therefore recommend that Policy DM44 is revised as detailed below (additions shown <u>underlined</u> deletions shown with a strikethrough). In addition to cycle and motorcycle parking and adequate provision of spaces for electric vehicles to plug-in, priority should be given to provision for other ultra-low emission vehicles, car sharing spaces and car club vehicles <u>where relevant</u> . [...]
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Darcliffe Homes Limited (Represented by Boyer Planning)
Consultee Full Name	Darcliffe Homes Limited
Consultee Organisation	Darcliffe Homes Limited
Agent Full Name	Mr Joe Hickling
Agent Organisation	Boyer Planning Ltd
Comment ID	PS1719
Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:53:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	To ensure that the policy remains effective over the length of the plan period, it is recommended that additional wording is included to clarify that development proposals would be required to meet the most up to date standards where relevant:
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	iii) Cycle and motorcycle parking should be provided in accordance with the Council's 'Cycling and Motorcycling Advice and Standards for New Development', <u>or such other standards as may be prepared</u> . This sets out design standards and expected levels of provision for different types of development.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Darcliffe have specific land interests within West Berkshire District, which are promoted to be allocated for residential development (Land to the east of Long Lane & south Blackthorn Close, Tilehurst, and Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst). In representing Darcliffe, Boyer are well-placed to advise on the appropriateness of the land promoted for development
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Lochailort Newbury Limited (Represented by Lochailort Investments Ltd)
Consultee Full Name	Lochailort Newbury Limited
Consultee Organisation	Lochailort Newbury Limited
Agent Full Name	Sarah Ballantyne-Way
Agent Organisation	Lochailort Investments Ltd
Comment ID	PS1399

Chapter / Policy / Appendix Number	Policy DM 44
Chapter / Policy / Appendix Title	Parking
Order	202
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	We object to the inflexibility of the minimum car parking standards set out in draft Policy DC36. The policy directly and indirectly encourages car ownership and usage to the detriment of other more sustainable forms of travel and entirely fails to support the Council's declared climate emergency. Policy SP1: Spatial Strategy, directs development to the most sustainable locations in the borough. Policy DM44 is inconsistent with this approach and fails to acknowledge that there will undeniably be circumstances where parking levels as proposed would be wholly inappropriate taking into account

	<p>location, access to public transport, local amenities and the type of development proposed and inherent car ownership patterns for said type of development. Maximum restraint should be applied to parking levels in highly sustainable locations. The centre of Newbury lies within walking distance of the train station and bus station, and there are alternative modes of transport available including car hire schemes, electric charging locations and cycle facilities in the town centre.</p> <p>This policy fails to meet the soundness tests in the NPPF as it fails to offer any exception taking account of the variables set out in paragraph 107 of the NPPF. As such, the following wording should be added to this policy:</p> <p><i>It will increasingly be the case that the level of onsite car parking should be reduced in the most sustainable locations. Where developments can demonstrate that non car-based travel modes have been maximised (for example through the implementation of car share schemes, by virtue of proximity to public transport hubs, or through enhanced cyclists' facilities) a reduced level of onsite car parking will be actively supported. Residential car parking within defined town centres will not be required to have regard to the minimum provision set out in this policy but instead will be assessed on an individual basis."</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pick, Anthony
Consultee Full Name	Mr Anthony Pick
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS178
Chapter / Policy / Appendix Number	Policy DM 45
Chapter / Policy / Appendix Title	Travel Planning
Order	205
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	21/01/2023 09:33:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>The emphasis in this section on a shift away from car travel should take more account of the movement towards more working from home. More importantly, the objective to reduce emissions will be achieved as much by the transition to electric vehicles, which will become progressively more cost-effective, as by abandonment of car usage. People will continue to wish to travel on short and longer journeys, and the convenience of private motoring will continue to be strongly felt. National policy strongly supports the trend to electric transmission.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The LPR should therefore include a specific plan for the widespread availability of charging points on both private and public premises, existing as well as new.</p> <p>Judging solely from that part of Newbury where I live, bus travel has had only a limited effect. If it is to be better supported, a more strategic approach may be needed, with a wider range of routes.</p> <p>The LPR should not exclude new roads and road extensions, should those prove necessary.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Ridgepoint Homes Ltd</p>
<p>Consultee Full Name</p>	<p>Miss Emma Runesson</p>
<p>Consultee Organisation</p>	<p>Ridgepoint Homes Ltd</p>
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS208</p>

Chapter / Policy / Appendix Number	Policy DM 45
Chapter / Policy / Appendix Title	Travel Planning
Order	205
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	Paragraph 113 of the NPPF requires all developments that will generate significant amounts of movement to provide a travel plan. The requirement to provide travel information pack for developments of 10 or more dwellings conflicts with this as it cannot be reasonably said that a development of this scale will generate significant amounts of movement. In addition, the preparation of travel information packs for smaller development would result in additional costs and delays which could render the development unviable.

	We therefore suggest that this section of the draft policy is deleted.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	N/A
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Purley on Thames Parish Council
Consultee Full Name	Christopher Thompson
Consultee Organisation	Purley on Thames Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS519
Chapter / Policy / Appendix Number	Policy DM 45
Chapter / Policy / Appendix Title	Travel Planning
Order	205
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 14:30:00
Attached Files	PS508 Purley on Thames Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes

Please give reasons for your answer	As far as Purley on Thames Parish Council are aware.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	As far as can be seen the Plan is NPPF compliant. <i>Purley On Thames 2018 Village Plan Action Point summary in relation to proposed policies attached.</i>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	After a revised period, consultation was advised
4. Proposed Changes	None - we would ask the planning authority to take into account the attached observations
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	Yes

* Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bloor Homes (Represented by White Peak Planning Ltd)
Consultee Full Name	Bloor Homes
Consultee Organisation	Bloor Homes
Agent Full Name	Rob White
Agent Organisation	White Peak Planning Ltd
Comment ID	PS1335
Chapter / Policy / Appendix Number	Policy DM 45
Chapter / Policy / Appendix Title	Travel Planning
Order	205
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 14:20:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Object. The policy is not justified.</p> <p>Monitoring is not compulsory once targets within travel plans have been met. The statement "regular monitoring and reporting in line with the requirements of the council" is, therefore, a concern without clarification as to what those requirements are.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The policy should be amended to read as follows:</p> <p>Where developments are required to develop travel plan measures, it is expected that necessary targets will be ... and undertake regular monitoring and reporting <u>until the travel plan targets have been met</u> in line with the requirements of the Council.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	Yes to explain the purpose of parking standards and the extent of variation from national policy, which makes the policy unsound.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Macro, Alan
<p>Consultee Full Name</p>	Councillor Alan

	Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1477
Chapter / Policy / Appendix Number	Policy DM 45
Chapter / Policy / Appendix Title	Travel Planning
Order	205
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes	Yes

* No	
Please give reasons for your answer	Support policy
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Appendix 1 Monitoring and Delivery

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS895
Chapter / Policy / Appendix Number	Appendix 1
Chapter / Policy / Appendix Title	Monitoring and Delivery
Order	206
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>APPENDICES</p> <p>No time to review in Detail but a general comment is the lack of maps within documents and the lack of ability to pull together data for a Specific Spatial Area and important Sub Areas.</p> <p>Appendix 1 – Monitoring & Delivery</p> <p>The Monitoring Indicators Titles do not tie up with the Categorisations used within the Objectives or the LPR Chapters, therefore they feel illogical and will be difficult to track. However as each MI does list perceived relevant Policies it leads one to wonder why they were not better grouped within the Plan and the DMs appropriately numbered.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Macro, Alan
<p>Consultee Full Name</p>	Councillor Alan Macro
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1480

Chapter / Policy / Appendix Number	Appendix 1
Chapter / Policy / Appendix Title	Monitoring and Delivery
Order	206
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<i>Table 14</i> Number and detail of sites identified Heritage at Risk Register Target of "decrease in numbers" is not suitable as a reduction could be caused by total loss of sites.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>A more meaningful target should be given.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Table 10 Monitoring Indicator 1 - Climate Change

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1478
Chapter / Policy / Appendix Number	Table 10
Chapter / Policy / Appendix Title	Monitoring Indicator 1 - Climate Change
Order	207
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>1. No target is given for “Number and percentage of residential development (one or more dwellings) applications approved which include renewable, zero and low carbon energy technologies. 2. No target given for number and percentage of non-residential development (100sqm or more) applications approved which include renewable, zero and low carbon energy technologies</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Challenging targets should be given</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Table 11 Monitoring Indicator 2 - Housing

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jardim, Jean-Claude
Consultee Full Name	Jean-Claude Jardim
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS556
Chapter / Policy / Appendix Number	Table 11
Chapter / Policy / Appendix Title	Monitoring Indicator 2 - Housing
Order	208
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	02/03/2023 22:57:19
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	Yes
Please give reasons for your answer	Yes, although I would have liked to have seen more input from the public.
4. Proposed Changes	I propose that the monitoring of "Number of net dwellings completed" as a delivery indicator is an insufficient measure of whether or not the Council is meeting the districts housing needs. As it fails to take into account whether these dwellings are occupied or not. I propose that a measure to be added which takes into account suitable occupancy of total and newly developed dwellings.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1479
Chapter / Policy / Appendix Number	Table 11
Chapter / Policy / Appendix Title	Monitoring Indicator 2 - Housing
Order	208
<p>Submission Type</p> <p>* E-Mail * Letter</p>	E-Mail

* Other * SMS * Web * Unknown	
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	<p>The target of 538 is the top of the range of 513 to 538 dwellings per annum given in policy SP12. It should be the minimum in the range given in policy SP12: 513 dwellings per annum.</p> <p>The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans</p> <p>No target is given for the use of previously developed "brownfield" land. Use of brownfield land is a government and council priority. Also, use of brownfield land minimises the use of greenfield land.</p> <p>The target of 30-40% on site of 10+ dwellings does not make it clear that 30% is for developments on brownfield land and 40% is for developments on greenfield land.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	

Please give reasons for your answer	
4. Proposed Changes	<p>The target should be changed to 513 dwellings per annum (the minimum in the range)</p> <p>The target should be removed.</p> <p>A challenging target should be given for the use of previously developed "brownfield" land.</p> <p>The wording should be changed to make it clear that 30% is for developments on brownfield land and 40% is for developments on greenfield land.</p> <p>No target is given for number of net dwellings completed by dwelling size</p> <p>A target should be given that is based on those in Policy SP18/Table 3.</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes

Appendix 2 Settlement Boundary Review

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bradfield College (Represented by Lucy White Planning)
Consultee Full Name	Julia Bond
Consultee Organisation	Bradfield College
Agent Full Name	Lucy White
Agent Organisation	
Comment ID	PS15
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	23/02/2023 10:12:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<ul style="list-style-type: none"> • Bradfield College supports the proposed amendments to the settlement boundary of Bradfield which incorporate the full extent of the indoor Tennis Centre, sports centre car park, Crossways house, boarding houses at the top of the hill and teaching facilities on Buscot Hill. • However, the proposed amendments should extend further to include: <ul style="list-style-type: none"> • The Moat – a College building used for goods deliveries immediately west of the Blackburn Science Centre; and • The staff accommodation to the west of Faulkner's Green. • With reference to the criteria for review of the settlement boundaries (Settlement Boundary Review Background Paper December 2022), the above sites do not warrant exclusion from the settlement boundaries. The sites do not occupy highly visible areas on exposed ridges, land forms or open slopes on the edge of settlements. Whilst the staff accommodation occupies higher land, it is visually contained by mature landscaping and visually connected to the College campus, in particular the Science Centre and visitor car park to the north and indoor sports facilities to the east. The pattern of residential development cannot be described as loose knit, sporadic or dispersed development. • The Moat lies immediately adjacent to the proposed extension of the settlement boundary and an associated cluster of principal College buildings which front onto the public highway and is well related to these buildings. • The inclusion of land opposite Faulkner's Green within the settlement boundary would provide the College with the opportunity to enhance the provision of staff accommodation through redevelopment and/or infill to deliver an improved mix of house types and sizes to meet the needs of staff and achieve a more efficient use of the land within the settlement than allowed under countryside policies. • The Bradfield College Campus Development Framework (June 2019), endorsed by WBC, identifies land at The Moat as suitable to meet future needs of the College through development of a new academic teaching facility. The inclusion of the existing built development within the settlement boundary would align with these agreed principles. • Accordingly, in respect of the tests of soundness the inclusion of these areas within the settlement boundary of Bradfield would represent a positively prepared policy approach consistent with paragraph 79 of the NPPF (2021) to locate housing in rural areas where it can enhance or maintain the vitality of rural communities and paragraph 84 to enable the expansion of all types of rural businesses.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The settlement boundary of Bradfield should be amended further to include The Moat and residential properties to the west of Faulkner's Green for the reasons set out above.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>To explain the rationale for including additional land within Bradfield's settlement boundary and the particular benefits of an enlarged settlement boundary for directing and controlling future development.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p>	<p>Yes</p>

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Rivar Ltd (Represented by Pro Vision)
Consultee Full Name	Rivar Ltd
Consultee Organisation	Rivar Ltd
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS577
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 09:37:00
Attached Files	Pro Vision (Rivar) full response.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Please see accompanying statement for our full representations.</p> <p>It is considered that West Berkshire's housing target should be increased and concern that the Council expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please see accompanying statement for our full representations.</p> <p>The settlement boundaries should be amended further as part of the Council's review to provide additional opportunities for growth to help meet the Council's housing targets during the plan period, including at 'Land adjacent New Road, Newbury'.</p> <p>Extract of full response relevant to consultation point:</p> <p>The site <GRE6> could be included in the settlement boundary given its modest scale. It is considered that character of this area clearly makes a greater contribution to the built form of the area; rather than the wider countryside. Such amendments to the settlement boundaries through the review provides an opportunity to proactively deliver small-scale sites to boost supply and to help meet the Council's housing targets during the plan period.</p> <p><Full response attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	We wish to appear at the examination to present our evidence and technical information to support these representations
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Charlesgate Homes Limited

Consultee Full Name	Mr Joe Atkinson
Consultee Organisation	Charlesgate Homes Limited
Agent Full Name	
Agent Organisation	
Comment ID	PS719
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 14:11:00
Attached Files	PS719 Charlesgate Homes_SB attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

development in accordance with the policies of the NPPF. * Yes * No	
Please give reasons for your answer	
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	<p>The burghfield common settlement boundary has been moved to allow for Oakley drive and Burghfield park to be included within the settlement boundary. It is not a natural defining line to base a settlement boundary, for example where the parish lines finish or even a clear buffer between settlements.</p> <p>There is an obvious settlement boundary line for Burghfield Common that would provide a natural tree buffer between the settlement of Burghfield Common and that of Ufton Nervet as attached.</p> <p>The current proposed west of Burghfield common will omit the following houses from being outside of the settlement boundary:</p> <p>Benhams farm, The Old Barn at Benhams, The Byre at Benhams, The Gatehouse at Benhams, and the Bolt Hole.</p> <p>The settlement boundary review by Burghfield parish council suggested similar to what we are suggesting in that;</p> <p>i) The settlement should include the new Burghfield Park development. ii) The settlement should include the HELAA BUR11 site which will be recommended for development in the forthcoming Burghfield ND</p> <p>It should be noted BUR11 is now SUL1 in the latest HELLA which of course is Benhams Farm.</p> <p>The councils response to this creates a somewhat disjointed settlement boundary and has likley come about due to the changes to the DPEZ and WBC seeking to impose a housing monitorium in Burghfield common and Burghfield Village which goes against everything the NPPF promotes, which is to be in favour of sustainable development</p>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	please see above
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	D'arcy, James (Represented by Pro Vision)
Consultee Full Name	James D'Arcy
Consultee Organisation	

Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS222
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	23/02/2023 20:43:40
Attached Files	PS222 James DArcy attachment_Redacted.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes

Please give reasons for your answer	As we have set out in previous representations (Regulation 18, February 2021), Mr D'Arcy owns land in the village of Wickham, which is considered suitable for development in principle. The land is previously identified in the Housing and Economic Land Availability Assessment (HELAA) as site 'Wel1' (as shown on the following extract from the HELAA (<i>document attached</i>)). Following the Settlement Boundary Review, we support the amendment of the Wickham settlement boundary which now includes this land (Map 55, copied below)(<i>document attached</i>).
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	No
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunders Family (Represented by Southern Planning Practice)
Consultee Full Name	Saunders Family
Consultee Organisation	Saunders Family
Agent Full Name	Alice Drew
Agent Organisation	Southern Planning Practice Ltd
Comment ID	PS246
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 10:08:00
Attached Files	Southern Planning Practice (The Sanders Family)

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We have no further comments on the Settlement Boundary Review, however our comments in relation to the Regulation 18 consultation still apply so please do read and consider these (<i>see Appendix 1</i>).</p> <p>The settlement boundary change we suggested does not appear to have been incorporated into the appendix of the Regulation 19 Local Plan. Therefore we would like to take this opportunity to reinforce our comments which suggest the revision to the settlement boundary to include land east of Stoney Lane which would follow clearly defined boundaries and would result in a logical rounding of the urban area of Newbury. It would also be very fitting with the recently approved planning application at land at Coleley Farm. The land east of Stoney Lane could be delivered in the short to medium term and would help to bolster the 5 year housing land supply of West Berkshire.</p> <p><i>For appendix see attachment.</i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a</p>	

change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Webb, Michael
Consultee Full Name	Michael Webb
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS285
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	27/02/2023 12:42:00
Attached Files	PS285 Michael Webb additional letter REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	The local plan is a good and sound document but in my view does not adequately cover settlement boundary decision criteria adequately enough for hamlet settlements particularly for cul-de-sacs such as Westbrook where particular reference should be made.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is	Yes

<p>consistent with achieving sustainable development.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	Yes to all over the above with the exception of a reference to traffic, parking and double stacking house development in cul-de-sac hamlet settlements within conservation areas such as West brook. I would be useful to reference the special characteristics of a hamlet as opposed to a village and what it means to retain the historic nature of a hamlet.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	Where small settlements have particular historic and often individual characteristics such as hamlets, cul-de-sacs in rural areas that are within conservation areas, every effort will be made to preserve the character of the settlement by not extending settlement boundaries to allow the distinct and historic nature of the settlement to change in a way that loses its identity.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	I understand that the uniqueness of Westbrook within the geographical jurisdiction of the WBC but having lived there for 40 years, I do understand the issues and would be able to explain them coherently. Being unique makes a settlement special as opposed to irrelevant and these places need to be referenced.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the</p>	Yes

Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Gallagher, Terence (Represented by Bluestone Planning)
Consultee Full Name	Mr & Mrs Terence Gallagher
Consultee Organisation	
Agent Full Name	Jeremy Flawn
Agent Organisation	Bluestone Planning
Comment ID	PS372
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	24/02/2023 09:27:00
Attached Files	Jeremy Flawn (Mr and Mrs Gallagher) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based	Yes

<p>on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>Extract of response relevant to consultation point</i></p> <p>The approach to identifying settlement boundaries is set out in Appendix 2 to the emerging Local Plan. It states (p.248) that the boundaries will include:</p> <ul style="list-style-type: none"> • "...The main settlement area. i.e. the area of close knit physical character..... •Curtilages which are contained, are visually part of the built up area and are separated from the open or wider countryside..." <p>This is in effect indicating that significant parts of settlements will be regarded as being in 'open countryside', an approach which is plainly illogical where those parts of the settlements that are currently outside settlement boundaries but which continue to play an important role in both contributing Council Tax towards the settlements in question, providing support for local services and facilities, and providing dwellings that are generally counted as forming part of the settlements for Office for National Statistics purposes.</p> <p>The NPPF supports development that is sustainable in all three objectives (social, economic and environmental) (para 8). In recognising the role that dwellings in rural settlements play in supporting local services and facilities (the social and economic elements of sustainable development), the NPPF confirms (paragraph 78) that residential development in rural areas:</p> <p><i>"...should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."</i></p> <p>This approach is very much aimed at recognising the value that those existing dwellings towards the edge of settlements such as Streatley and Goring play in terms of helping to achieve sustainable development. However there is no recognition in the policies of the draft Local Plan of the role such dwellings play in supporting their local settlements. This is a significant omission given the important role that these edge of settlement dwellings play in the helping to maintain the viability of the settlements in question.</p> <p>Appendix 2 – Settlement Boundary Review</p> <p>The settlement boundary review (December 2022) which has been undertaken as part of the Local Plan review is understood to have followed a landscape-led approach, but that it is being enhanced with community-led assessments of each individual settlement in determining whether settlement boundaries should be changed.</p> <p>The main criteria for drawing boundaries to include land are understood to be as follows. Boundaries will, in future, <u>include</u>:</p> <ul style="list-style-type: none"> • The main settlement area. i.e. the area of close knit physical character • Sites allocated through the Local Plan and Neighbourhood Plan processes • Curtilages which are contained, are visually part of the built up area and are separated from the open or wider countryside • Recreational or amenity open space which is physically surrounded by the settlement (or adjoined on three sides by the settlement) • Existing community facilities (such as churches, schools and village halls) which are physically and visually related to the settlement • Single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built up area, taking account of any environmental development constraints. <p>In contrast it is understood that the following will be excluded from settlement boundaries:</p> <ul style="list-style-type: none"> • Highly visible areas such as exposed ridges, land forms or open slopes on the edge of settlements • Open undeveloped parcels of land on the edges of settlements which are not either functionally or physically or visually related to the existing built up area • Recreational or amenity open space which extends into the countryside or primarily relates to the countryside in form and nature. This includes designated Local Green Space. • Tree belts, woodland areas, watercourses and other features which help to soften, screen existing development and form a boundary to the settlement • Areas of isolated development which are physically or visually detached from the settlement and areas of sporadic, dispersed or ribbon development • Large gardens or other areas, such as orchards, paddocks, allotments, cemeteries and churchyards, which visually relate to the open countryside rather than the settlement

- The extended curtilages of dwellings where future development has the capacity to harm the structure, form and character of the settlement
- Loose knit arrangements of buildings on the edge of a settlement
- Farmsteads, agricultural buildings, or converted agricultural buildings on the edge of a settlement which relate more to the rural context
- Horse related development, minerals extraction, landfill, water features, public utilities (sewage treatment plants, substations) on the edge of a settlement
- Important gaps between developed areas in fragmented settlements. Settlement boundaries do not need to be continuous. It may be appropriate, given the nature and form of a settlement, to define two or more separate elements of it.
- Roads, tracks and public rights of way running along the edge of a settlement

In our previous submission dated 20th January 2021 it was proposed that the settlement boundary should be extended for the reasons as set out below, and all of which remain valid despite the December 2022 report not recommending to extend the settlement boundary at this point.

Land at Vicarage Lane, Streatley (postcode RG8 9HX) represents a parcel of land containing three properties which, although outside the settlement boundary for Streatley as depicted on the proposed Local Plan proposals map, are logically part of the settlement and therefore should be included within the settlement boundary for Streatley despite the findings of the recent review. They are visually related to the village, rather than being visually relate to the open countryside.

The three properties have been described by name in the Village Design Statement for Streatley (2009) p.17 as lying within the settlement boundary. These properties are Waterford House (previously the Vicarage); the Old Vicarage; and Windrush.

Under the heading "THE VILLAGE OF STREATLEY WITHIN THE SETTLEMENT BOUNDARY" the text on page 17 states:

"Vicarage Lane lies opposite Church Lane and to the south of the High Street. A two-storey, 20th century house on the west side of Vicarage Lane occupies part of the originally extensive gardens of Streatley House.

On the east side of Vicarage Lane is the attractive, riverside Millstream House. The Lane leads to a landmark building – the 19th century Vicarage, now a private house, with cream painted brickwork. The stables to that Vicarage have been converted into a two-storey family house. Adjacent to the "Old Vicarage" lies the 1960s vicarage. All these houses are in traditional style with brick walls and plain tile roofs. The windows vary in type, casement or vertical sash, and some frames are painted white whilst others are in natural hardwood finish." (the three properties in question are those underline above).

The proposed extension to the settlement boundary which should be considered is set out in Figure 1 <see attachment pg.6>:

The three properties and their associated curtilages clearly read as forming part of the physical settlement rather than lying outside of the settlement. The Streatley Conservation Area Appraisal takes this further confirming in Appendix 7 that the three properties form part of the historic settlement or recent settlement growth (see Figure 2 <in attachment>) and that they form a part of the setting of – or are included within - the Conservation Area boundary for the Streatley Conservation Area (see extract from Appendix 8 in Figure 3 <see attachment>). Southfields to the south of Waterford House is significant because it does not form part of the continuum of built development on Vicarage Lane and is therefore not a logical part of the settlement. It is an outlier property which takes its access off the Reading Road and is remote, both physically and visually, from the Vicarage Lane properties.

Over the last 20 years Vicarage Lane has changed from a rural muddy track extending southwards out of the village of Streatley into a low density residential road with built development and village amenities along the length of the Lane.

In particular the following changes have taken place:

- The 1960s Vicarage was redeveloped in 2010 to create Waterford House, a modern well-appointed detached dwelling and grounds leading to the edge of the River Thames
- Vicarage Lane was resurfaced for the first time in 2011 and is now well-used for vehicular traffic every day
- In 2011 planning permission was granted for the construction of a manege and equestrian facilities on the west side of Vicarage Lane.
- In 2017 the Granary was demolished and a new dwelling was constructed on the eastern side of Vicarage Lane to the north of Windrush.
- The land immediately to the north of Windrush was acquired by the Parish Council for the benefit of the community in 201.
- In 2015 Windrush was substantially extended to form an impressive family home.
- An impressive indoor swimming pool was built by Streatley House in their garden adjoining the Lane in 2020.

The Lane forms an integral part of the built area of the village of Streatley, and it is therefore entirely logical to include the three properties within an extension to the settlement boundary.

The inclusion of these properties within the boundary will neither harm the setting of the Conservation Area nor the AONB, as the properties are already in situ and no change is proposed as part of this proposed boundary extension.

In the assessment of recent application ref. 21/03097/FULD the Councils' Conservation Officer has confirmed that the potential development of the site, in Conservation terms, was not likely to the impact on designated heritage assets which would be limited to the nearby conservation area only and that a well screened site could be developed without detriment to the setting of the conservation area.

The land clearly reads and is understood by the casual observer to form part of the settlement already, indeed this has been recognised in both the Conservation Area Appraisal and the Village Design Statement. The environmental constraints that affect these three properties (ANOB, Conservation Area

	<p>/ trees / River Thames corridor etc) will serve to ensure that by including these properties within the settlement boundary there is no greater prospect of further development taking place than that which is there today. This satisfies the third objective for sustainable development in the NPPF – the environmental objective.</p> <p>I trust that the above is helpful in clarifying my clients' concerns in relation to the emerging Local Plan. I would be grateful if you could acknowledge receipt of these representations and enclosures.</p> <p><i>For full response see attachment.</i></p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To discuss the merits of the settlement boundary matters
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Geyer, Celia
Consultee Full Name	Celia Geyer
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS560
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 07:45:00
Attached Files	PS560 Celia Geyer Attachment (Redacted).pdf

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>HAMPSTEAD NORREYS SETTLEMENT BOUNDARY:</p> <ul style="list-style-type: none"> • The Parish Council requested the inclusion of the land of properties that have received planning approval on land outside the village settlement boundary, such as development for 10 houses at Folly View, Springbank, The Old Smythy and development at Manor Farm. However, it is not including the land that has served Tree Tops as an access track and rear garden since 2006. • We recognise that planning permission to formally pave this track has been disputed in the past, however, it is clear that this track has been in constant use since 2009, serving as the main vehicular access to the property Tree Tops. Evidence of this can be seen on the attached letters and photographs of various previous applications, whereby neighbours and nearby residents confirm its long term use. Further evidence can be seen from satellite images, such as google earth, where cars can be seen parked outside the back of the house. It is also clear from satellite imagery that the land to the rear has been used as a garden. • The last planning application ref 20/01914/FUL which was granted in 2020 for an extension of the house, approved the change of use of the lower part of this track to domestic curtilage. • Considering the evidence that this track and land behind Tree Tops has been in domestic use for over 10 years, we request the inclusion of this land to the village settlement boundary. We consider this approach would be consistent with the evidence base underpinning the emerging local plan, in particular the Settlement Boundary Review (SBR) background paper. Specifically Appendix 1

	<p>notes that locations which it is appropriate included curtilages which are contained, visually part of the built up area and are separated from the wider or open countryside.</p> <p>Please see attached on the plan, the land in the request is coloured in pink</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>HAMPSTEAD NORREYS SETTLEMENT BOUNDARY: Inclusion of access track and rear garden of Tree Tops, Forge Hill, Hampstead Norreys, RG18 0TE. Please see attached document and map indicating in pink, the area to be considered for inclusion.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>
<p>Bookmark</p>	<p>Blackburn, Marie</p>
<p>Consultee Full Name</p>	<p>Mrs Marie Blackburn</p>
<p>Consultee Organisation</p>	
<p>Agent Full Name</p>	
<p>Agent Organisation</p>	
<p>Comment ID</p>	<p>PS1239</p>
<p>Chapter / Policy / Appendix Number</p>	<p>Appendix 2</p>
<p>Chapter / Policy / Appendix Title</p>	<p>Settlement Boundary Review</p>
<p>Order</p>	<p>214</p>
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	<p>E-Mail</p>
<p>Response Date</p>	<p>02/03/2023 11:13:00</p>
<p>Attached Files</p>	

<p>1. Do you consider the Local Plan Review is legally compliant? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>We fully support West Berkshire's Local Plan Settlement Boundary Review for Brightwalton as proposed in Regulation 19.</p> <p>This Review of Settlement Boundaries extension to the South, will bring the settlement boundary for Isbury & Killbegs in line with the Settlement boundary of Saxon Acres and Brickleton House to the West of Isbury & Killbegs.</p> <p>Objections made by the Parish Council for not wanting this one area only, not to be extended to the South and brought in line with the other properties to West, doesn't make sense. Particularly as Saxon Acres has its Settlement Boundary in line with the current proposal Review and is adjacent to Isbury & Killbegs and the Conservation Area begins East of Killbegs. In my opinion there doesn't seem to be any valid reason for the objections of extending the Settlement Boundary as per your Review proposal.</p> <p>Concerns about garden infill for development of Isbury and Killbegs seems a bit premature, as any development that may or may not be proposed in the future would still have to adhere to rules and regulations set by West Berkshire Planning Department at the time of application. The current Settlement Boundary Review is based on the whole of Brightwalton Village and therefore, should not prejudice one area only.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Richardson, Neil
Consultee Full Name	Mr Neil Richardson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS926
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:29:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Page 309 Criteria for including / excluding sites within defined settlement boundaries.</p> <p>Exclusions.</p> <p>“Large gardens or other areas...” etc . Need for qualification. The extent of enclosure provided by existing demarcation features such as walls, tree / hedge boundary lines need to be flagged up as relevant to the consideration of such areas.</p> <p>“ The extended curtilages of dwellings <i>and other buildings</i> where future development has the capacity to <i>substantially</i> harm the structure form and character of the settlement.”</p> <p>The words in italics are suggested additions to the criterion to provide a degree of flexibility and allow for some variety in built form to be introduced which may not necessarily be to the taste of the decision maker.</p> <p>Some defined settlement boundaries in the above do not sufficiently reflect the varied character of the settlement concerned.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p>	

* Yes	
* No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Shakespeare, Susan
Consultee Full Name	Susan Shakespeare
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS364
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type	Web
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	02/03/2023 21:20:23
Attached Files	Susan Shakespeare attachment REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	Yes
* Yes	
* No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No</p>	<p>Yes</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>I do not believe the settlement boundary, as currently defined around Cold Ash - specifically at Alley Gully, Bucklebury Alley, is consistent with the criteria set out in the consultation draft Local Plan and national policy in terms of delivering sustainable development. The current alignment of the Cold Ash settlement boundary at Alley Gully, Bucklebury Alley, should be revised in accordance with the settlement boundary criteria specified by the Council.</p> <p>The current alignment of the boundary is arbitrary and ill-defined; cutting through an area of woodland, identified by DeFRA as priority habitat (circled in black on the extract from Defra Magic Map) and does not follow any defined features, leaving its precise position open to misinterpretation on the ground. The area in question is identified on an extract from the local plan shown by red hatching (see attachment).</p> <p>The Council suggests settlement boundaries have been defined based on landscape analysis, contained within a variety of reports, including:</p> <p>“Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire: FINAL PHASE 2 REPORT: COLD ASH”</p> <p>This report sets out the key landscape characteristics of Cold Ash, which include, inter alia:</p> <p>“- variable land cover forming an intricate mosaic of woodland, pasture and small areas of remnant heathland.....</p> <ul style="list-style-type: none"> • large, interconnected woodland blocks and strong hedgerow pattern with mature trees restrict views and create an enclosed and intimate character; • low wooded horizons are a feature; • numerous semi-natural woodlands of ancient origin; • many features of biodiversity interest including heathland, dry and wet woodland, bog and areas of wet meadow; • intricate network of rural lanes, many sunken and overhung by woodland plus more <p>intrusive road infrastructure.....” The report specifically states:</p> <p>“- historic parkland based on medieval deer parks and manor houses with associated ornamental parklands with gardens, rides and plantings are a particular feature;</p> <ul style="list-style-type: none"> • flat to undulating plateau, generously scaled rolling landscape with some pronounced wooded ridges (VDS); • a complex pattern of landscape, dominated by woodland; coniferous, or mixed with beech and birch (VDS) • pastures; remnant heathlands and commons (VDS); • heathland and woodland habitats - deciduous and mixed woodland to pasture and arable (VDS); • the area abounds with natural drains, issues and sinks, all of which help to ensure natural drainage and control the run-off of excessive rainfall. These are particularly evident in the local gaps between Cold Ash and the neighbouring parishes (VDS); • woodland is a dominant natural feature in this area with a typical landscape of pine and birch...; • the older parts of the villages are more wooded and have larger and more mature species than the newer parts (VDS); • in the future, the lack of large trees could have an adverse effect on the village as a whole if sufficient open space is not provided in new developments to allow for planting larger trees (VDS).” <p>Reference is made to the importance of woodland and natural habitats throughout the report.</p>

This same theme is continued throughout the Cold Ash and Ashmore Green Village Design Statement, adopted as SPG, by West Berkshire Council.

The Design Statement advises, particular landscape features include: "... heathland and woodland habitats...."

"...,deciduous and mixed woodland to pasture and arable linear settlements within wooded areas;"

Bucklebury Alley is specifically mentioned:

"Areas such as Fishers Lane, Bucklebury Alley and the lower part of Ashmore Green Road have retained much of their original look, having grass verges, large trees and hedges and no pavements. Any houses are set well back. Otherwise, the lanes are flanked by fields or woods."

Moreover, the report advises:

"The oldest part of the settlement appears to be the houses and cottages at Bucklebury Alley, which even today gives the impression of being a forest clearing settlement."

Under Policy ENT. 1 Guidelines for Environment, Landscape; specific reference is made to conserving:

"...the diversity and mix of landscape character types in the parish, eg the wooded setting of Cold Ash".

The Council states that:

"...settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside...."

The wording "settlement boundaries protect the character of a settlement" is particularly relevant on this occasion. In this instance, the wider "settlement" is Cold Ash, but more specifically in terms of this representation the "settlement" is Bucklebury Alley, which displays its own unique landscape characteristics within the overall context of Cold Ash, as detailed above.

The red hatched area shown on the plan, contributes to the wooded vernacular, of Bucklebury Alley, fronted by mature, if not "vintage" oak trees, set atop a hedge bank along Bucklebury Alley. The site comprises mature ash trees, some of which have already been felled without licence by the landowner, as well as young Beech, Hazel and Holly trees. The area sits within the North Wessex Downs AONB. The site also allows for long views towards Westrop Woods, a key feature of the landscape setting of Bucklebury Alley.

The Council advises:

"Where practicable and barring the exceptions set out below, boundaries will usually follow clearly defined features such as walls, hedgerows, railway lines and roads.

Where possible, preference will be given to using features that are likely to have a degree of permanence as some features can change over time."

This is crucially relevant to the site in question, an area of woodland, with the settlement boundary running through it, which does not follow any clearly defined feature and is, therefore, very much, open to interpretation.

The proposed alteration to the settlement boundary at this point would result in the alignment being clearly and permanently defined by the fence line of the north east boundary to Pine Lodge, by Bucklebury Alley itself along the northern boundary, and the fence line of the garden surrounding Eddystone House (also known as Chy an Drea) along the north west side, illustrated by the red line on the attached extract from the local plan.

The Council suggests:

"single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built up area, taking account of any environmental development constraints..."

are suitable for inclusion within settlement boundaries.

However, the critical wording is "physically, functionally and visually related to the existing built up area" and even more importantly "taking account of any environmental development constraints"

The area of land in question falls foul of these specific criteria.

Physically, the site is a small, misshaped, sloping, narrow, sight located on a sharp bend along the Alley with significantly impaired sight lines to east and west, in direct contrast to existing properties.

Functionally, the site provides an area of green infrastructure, especially, essential habitat for protected and non protected species, including bats, as well as an unrestricted stepping stone for roaming mammals such as Muntjacs and a linear habitat in terms of its hedgerow. Its function does not, therefore, accord with the existing built development along the Alley.

Visually, as discussed above, the site plays an essential role in the natural, wooded landscape setting of the Alley,

The Council advises areas to exclude from settlement boundaries, include, inter alia:

"Tree belts, woodland areas, watercourses and other features which help to soften, [and] screen existing development...."

I advocate, this particular area accords with this criteria comprising elements of woodland, hedgerow and an overall area of green infrastructure which contributes to the unique wooded and natural landscape of Bucklebury Alley and should, therefore, fall outside the settlement boundary for Cold Ash.

The proposed re alignment of the Cold Ash settlement boundary at this point - Alley Gully - Bucklebury Alley will be marked by clearly defined, permanent features.

(see attachment)

3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	See attachment
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	I would like to participate in the oral part of the examination in order to expand on my reasons given for the realignment of the Cold Ash settlement boundary.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS900
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	

<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	<p>No</p>
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</p> <p>APPENDICES</p> <p>No time to review in Detail but a general comment is the lack of maps within documents and the lack of ability to pull together data for a Specific Spatial Area and important Sub Areas.</p> <p>Appendix 2 – could include a symbol to show which of the Settlements are designated as Rural. See comment under Glossary of Terms below.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>

5. Independent Examination	I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Sir Richard Sutton Ltd (Represented by Pro Vision)
Consultee Full Name	James Ingestre
Consultee Organisation	Sir Richard Sutton Ltd
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS562
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 09:16:33
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Sir Richard Sutton Limited has land interests in the district including at Stockcross (identified on Map 41 of the SBR, December 20221). We note that the proposed boundary amendments were not subject to open public consultation at Regulation 18 stage, and therefore, we have not had opportunity to comment previously, other than on the criteria for the review. The SBR (Appendix 2) reports that the Parish Council did respond to the Council's closed consultation. It supported the proposed changes, noting that they allowed for a number of potential infill sites, whilst restricting encroachment into wider areas and open spaces. We support the amendment of the Stockcross settlement boundary, including the proposed amendment to include land to the rear of 38-47 Ermin Street. These amendments represent positive planning to help encourage proportionate growth of the village over the plan period (to 2039), which is in general accordance with national policy and its objective to help sustain rural communities, and their existing services and facilities (National Planning Policy Framework, 2021; paragraph 79)</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Feltham Properties (Represented by Pro Vision)
Consultee Full Name	Sean Bates
Consultee Organisation	Feltham Properties
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS747
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 16:02:17
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	No

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Feltham Properties has interest in the outcome of the Settlement Boundary Review (SBR) (December 2022), especially in regard to South East Newbury (Map 37; formerly Map 36), and land around Newbury College and the A339.</p> <p>We note that the only amendment to the settlement boundary in this specific location, is to move the adopted boundary from the west to the east side of the A339.</p> <p>The relatively recent development immediately south of the Newbury College campus appears to have been overlooked in this review. There is now a new primary school (Highwood Copse Primary), accessed from a new service road from the A339., and which will in due course provide an access into the Sandleford Park major development area (now benefitting from outline permission following the Secretary of State decision as well as the extant site allocation in the Core Strategy).</p> <p>With reference to the SBR criteria, settlement boundaries should include, amongst many other things, <i>“Existing community facilities (such as churches, schools and village halls) which are physically and visually related to the settlement”</i>.</p> <p>In this case, the area around the new school and access road are quite clearly both physically and visually related to the settlement of Newbury, adjacent as they are to the College campus, which is within the boundary.</p> <p>It appears that Town Council and the District Council has overlooked the necessity to update this specific part of the town in line with the on the ground reality.</p> <p>Finally, we make a procedural point. There was no open public consultation on the SBR and therefore we and the wider public have not had the opportunity to comment on the proposed amendments until this advanced (Regulation 19 stage), when the Council's position has been finalised (subject to examination). Had there been an open consultation during Regulation 18 stage, Feltham Properties would have raised these matters and encouraged the Council to amend Map 36 in accordance with the review criteria.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>A minor extension of the boundary of Map 37 to include land between the A339 and south of Newbury College, including the Highwood Copse Primary School and access road within the settlement boundary of Newbury.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	To explain the reasons for the inaccuracy of this element of the settlement boundary review.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p>	Yes

* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Jones, R.L.A (Represented by Carter Planning Ltd)
Consultee Full Name	Mr R.L.A. Jones
Consultee Organisation	
Agent Full Name	Mr Mark Carter
Agent Organisation	Carter Planning Limited
Comment ID	PS1146
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:28:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters	No

<p>that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	<p>Objection.</p> <p>We do support a new boundary review but there is no evidence that any work has been carried out since the last Plan. Alternatively that work was either effective and inadequate.</p> <p>Setting the parameters narrowing the review before carrying out the review is flawed.</p> <p>We are sceptical that this review has been a thorough a vigorous exercise hence it still includes phrases such as "Boundaries will include" and "Boundaries will exclude" which are unnecessary if that work has actually been carried out</p> <p>Further, existing allocated but undeveloped sites were automatically included in the settlement boundary whatever their landscape impact may be.</p> <p>The Plan's approach to the selection of sites prior to the review of settlement boundaries is flawed and not justified.</p> <p>In particular site HAS 19/RSA22 is a large extension to the settlement with no particular boundaries to the north and HAS 20/RSA23 can be described as a ribbon of development which is sporadic and not part of the close knit physical character of the village of Lambourn.</p> <p>HAS 20/RSA 23 has been selected and yet there is no landscaped boundary.</p> <p>The site is on a ridge, and an open area on the edge of the settlement seen at the entrance to the village.</p> <p>The Plan's review of settlement boundaries was previously poorly applied and continues as settlement boundaries have not been <u>comprehensively</u> re-examined.</p> <p>It is nonsensical if an unallocated site which has little impact on the landscape can be examined but a previously allocated site which has not been developed and has undesirable landscape impacts is ignored.</p> <p>Sites HAS 19/RSA22 and HAS 20/RSA 23 should be removed if not required, or one should be replaced by LAM007 or alternatively LAM007 "Land between Folly Road, Rockfel Road and Stork House Drive" should be included in the settlement boundary alteration for Lambourn in addition to meet overall housing need.</p> <p>in particular HAS 20/RSA 23 compares unfavourably with LAM007. It is irregular in shape, has no natural containment and is further from the village centre. It is unable to provide the variety of mix and type of housing which can be delivered by LAM007 and is centred on the provision of low density high cost housing unsuited to the low cost housing required by the horse racing economy of Lambourn.</p> <p>Site LAM007 should be included in the Draft LPR.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	No
<p>Please give reasons for your answer</p>	Please see other submissions on this specific point <See Rep: ID1170>
<p>4. Proposed Changes</p>	Carry out an unconstrained boundary review to include all sites on the edge of urban areas, especially around Lambourn, and not the limited review that appears to have taken place.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	We do not consider the LPR is sound and would like to participate in the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p>	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes
* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Yattendon Estates Ltd (Represented by Barton Willmore now Stantec)
Consultee Full Name	James Hole
Consultee Organisation	Yattendon Estates Ltd
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1160
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/03/2023 14:15:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant?	Yes
* Yes	
* No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	No
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No
* Yes	

* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The settlement boundaries have been reviewed in the Settlement Boundary Review Background Paper published in December 2022, a paper which forms part of the 'evidence base' supporting the Draft Local Plan.</p> <p>We note that the scope of these reviews for smaller settlements was extremely limited and mainly consisted of slight tweaks to the existing boundaries, as opposed to any more significant changes to include adjoining built form or meaningful extension of settlements to reflect functional relationships. Map 54, contained in appendix 3 of the Settlement Boundary Review Background Paper shows that the review of Yattendon applied this limited approach and has not sought to include existing development to the south within an updated settlement boundary.</p> <p>The existing built form to the south of the existing boundary (comprising The Withys / Home Farm Cottages and the Renegade Brewery) forms part of the functional operation of Yattendon Village in combination with the central cricket pitch. This area of built form comprises 21no dwellings and 14no commercial properties, amounting to approx. 8,400m² of commercial floorspace. These commercial premises employ 120no people. Due to its scale and functional relationship, this area should be included within the Yattendon settlement boundary.</p> <p>The Settlement Boundary Review Background Paper lists the criteria of inclusion of land within a settlement boundary (pages 7 and 8). Page 8 in particular set out the specific issues to be considered on a site by site basis and we note that leisure uses located on the edge of settlements will be considered according to their scale, functionality, visual and physical relationship to the settlement.</p> <p>The cricket pitch, which represents a leisure use, shares two boundaries with the existing settlement boundary of Yattendon and therefore they are physically connected. The Withys / Home Farm Cottages and the Renegade Brewery are sited directly to the south of the cricket pitch, on a third side, emphasizing the functional and visual relationship of this built form with the settlement of Yattendon as currently defined.</p> <p>On the basis of the above, we request that the settlement boundary for Yattendon is expanded to include the cricket pitch, The Withys, Home Farm Cottages and the Renegade Brewery.</p> <p>Alternatively, should the Council not wish to include the cricket pitch, a second separate settlement boundary for Yattendon should be introduced to comprise The Withys, Home Farm Cottages and the Renegade Brewery. We note that other settlements within the district, such as Enborne Row and Eastbury, comprise 2 separate boundaries and this approach should also be applied to Yattendon.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	N/A
4. Proposed Changes	Please see above.
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The	Yes

submission of the Local Plan Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Croudace Ltd (Represented by Nexus Planning)
Consultee Full Name	George Hopkins
Consultee Organisation	Croudace Ltd
Agent Full Name	Jack Dickinson
Agent Organisation	Nexus Planning Ltd
Comment ID	PS1524
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:24:00
Attached Files	Croudace Homes Combined Appendices.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable	No

alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Settlement Boundary Review Background Paper (December 2022)</p> <p>Croudace notes the Settlement Boundary Review confirms that no changes to the settlement boundaries to the north of Thatcham, either affecting or close to the site, are proposed. The Council confirms a 'landscape led approach' to the re-drawing of settlement boundaries has been taken.</p> <p>Page 7 of the document provides a list of built development and landscape features that settlement boundaries will or will not include. It is confirmed that contained curtilages and single plots that are physically and visually related to the settlement will be included, whilst the inclusion/exclusion of employment and leisure uses located at the edge of settlements will be considered on a site by site basis.</p> <p>On that basis, Croudace are concerned that the Regency Park Hotel, and dwellings known as 'The Creek', 'Creek Cottage' and 'Creek Bungalow' along Bowling Green Road and Heath Lane have not been included within the settlement boundary for Thatcham.</p> <p>Regarding the hotel, Croudace contests that it is counterproductive and economically limiting to exclude this business from the settlement of Thatcham. To promote investment in existing facilities, Croudace considers that a relatively straightforward amendment to the settlement boundary should be made to allow future expansion or alteration to the hotel to be more straightforward and not constrained by an arbitrary line on a plan at which point planning policy direction changes.</p> <p>Likewise, the dwellings mentioned above are all read as part of Thatcham, are accessed from a main public highway and turn their back on the open countryside beyond Thatcham.</p> <p>The dwellings and their enclosed curtilages should be included within the settlement boundary, particularly as it has already been established that:</p> <ul style="list-style-type: none"> - The Settlement Boundary Review Background Paper takes a 'landscape led' approach; and - The sites mentioned fall below the 95m contour above which landscape impacts begin to arise. <p>Croudace urges the Council to revisit its assessment of the settlement boundary of Thatcham accordingly.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	No
Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The opportunity to discuss matters of legal compliance and soundness with the Planning Inspector, together with proposed modifications to the Plan.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan	Yes

Review for Independent Examination * Yes * No	
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Pangbourne College (Represented by Turley Associates)
Consultee Full Name	Pangbourne College
Consultee Organisation	Pangbourne College
Agent Full Name	Mrs Henny Handley
Agent Organisation	Turley Associates
Comment ID	PS1546
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:18:00
Attached Files	PS1546 Turley (Pangbourne College) Boathouse SBR Plan.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	No

* Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	Yes
Please give reasons for your answer	<p>The plan fails to consider amendments to the existing settlement boundary to include existing developed areas and anomalies within the existing mapping that would form a logical part of the existing settlement. The LPR evidence base includes the settlement boundary review topic paper. Appendix 1 of the topic paper – the audit criteria for services and facilities states that:</p> <p>“A settlement’s accessibility to services and facilities is defined by a 1 kilometre radius from the centre of the settlement and for access to railway stations and employment opportunities within 2 kilometres. These distances demonstrate a reasonable commutable walking distance as suggested by the Chartered Institution of Highways and Transportation (Providing for Journeys on Foot 2000)”</p> <p>Appendix 2 – the settlement audit identifies the range of services and facilities available in Pangbourne and maps the 1km and 2km distances. It is of note that the whole of the Pangbourne College Estate is within 2km of the centre of the settlement, and a large proportion lies within 1km.</p> <p>Appendix 3 – the audit matrix and settlement scores identifies Pangbourne as the joint third highest scoring settlement within the District (excluding the main urban areas). It scores 40 points out of a maximum of 48, losing points for matters such as the lack of a mobile library (despite it having a permanent one). It is clearly one of the most sustainable settlements within the district.</p> <p>The plan fails to consider amendments to the existing settlement boundary to include existing developed areas and anomalies within the existing mapping that would form a logical part of the existing settlement. It is considered that the settlement boundary around Pangbourne should be reviewed to take into the account the “on the ground” position of the Pangbourne College boathouse site, where the settlement currently dissects the site artificially.</p> <p>The below map extract shows the existing settlement boundary (black line), the proposed change to it shown in the Settlement Boundary Background Paper 2022 as part of Local Plan Review (green line) and the Pangbourne College boathouse site (red line). We consider that there is no rationale for the settlement not extending to the end of the boathouse site, which would align with the settlement edge at Hartslock Court. This would form a more logical edge to the settlement to reflect the existing built for within the settlement and would not extend it beyond the current eastern extent.</p> <p><i>See attachment ‘PS1546 Turley (Pangbourne College) Boathouse SBR Plan’</i></p> <p>There is no logical rationale for the placement of the current settlement boundary line and it is requested that it is amended to include the whole of the site. This is not a major modification to the proposed plan but instead corrects the current on the ground position.</p> <p>Submissions have previously been made throughout the emerging Housing Site Allocations DPD process proposing the amendment of the settlement boundary to include the site which is considered more closely reflects the existing pattern of development on this edge of Pangbourne.</p>
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	N/A
4. Proposed Changes	It is considered that the settlement boundary around Pangbourne should be reviewed to take into the account the “on the ground” position of the Pangbourne College boathouse site, where the settlement currently dissects the site artificially.

	<p>The below map extract shows the existing settlement boundary (black line), the proposed change to it shown in the Settlement Boundary Background Paper 2022 as part of Local Plan Review (green line) and the Pangbourne College boathouse site (red line). We consider that there is no rationale for the settlement not extending to the end of the boathouse site, which would align with the settlement edge at Hartslock Court. This would form a more logical edge to the settlement to reflect the existing built for within the settlement and would not extend it beyond the current eastern extent.</p> <p><for map see attachment></p> <p>There is no logical rationale for the placement of the current settlement boundary line and it is requested that it is amended to include the whole of the site. This is not a major modification to the proposed plan but instead corrects the current on the ground position.</p> <p>Submissions have previously been made throughout the emerging Housing Site Allocations DPD process proposing the amendment of the settlement boundary to include the site which is considered more closely reflects the existing pattern of development on this edge of Pangbourne.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	No
5. Independent Examination	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Parkin, Jane
Consultee Full Name	Jane parkin
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1760
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
<p>Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown</p>	E-Mail
Response Date	16/03/2023 09:51:00
Attached Files	
<p>1. Do you consider the Local Plan Review is legally compliant? * Yes</p>	

* No	
Please give reasons for your answer	
<p>2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
Please give reasons for your answer	<p>*LATE RESPONSE*</p> <p>I am the joint owner of a plot of land and garage on Morphetts Lane Chieveley included in the 2017 HSA DPD as CHI016 under boundary Changes too Small to allocate now called CHI014.</p> <p>It has been in family ownership for 53 years, Morphetts lane used as an access at all times with or without vehicles and a right established to drive on the footpath. As such a prescriptive access is noted on the HMLR title gained by long use. Any questions regarding this I am happy to answer. I have not been consulted.</p> <p>I apologise for my late response <i>[personal information removed]</i> I have been following closely the stages of the Local Plan Review in which it was stated that settlement boundary maps would be included in the plan by the spring of 2021. I was unable to locate these and there was no written reference to boundary changes for Chieveley that I could find.</p> <p>It has now come to my attention that there is a proposal for the settlement boundary to the North of the Village of Chieveley to revert to its pre 2017 HSA DPD position. There seems to be no evidence put forward for this and the change would appear to be arbitrary.</p> <p>Chieveley Parish Council wrote in response to Consultation on the LPR 2022-39 settlement boundary review in 2020 page 136 "The settlement boundaries were reviewed for the housing site Allocations Development Plan Document adopted in May 2017. Nothing has changed since then. The settlement boundaries for Chieveley and Courage seem appropriate the Parish Council is unaware of any compelling need to Change them"</p> <p>In this document the response from West Berks Council Certainly does not mention changes to the settlement boundary North of the village.</p> <p>The Kirkham Landscape report is used as base evidence for the 2022-2039 LPR in which it highlights that in this part of the village there would be no harm to the landscape from some development.</p>

	<p>The 2017 HSA DPD was a rigorously researched and endlessly consulted upon ,legal document.Is there any evidence to say the settlement boundary of Chieveley was established in the wrong location?</p> <p>If there is a proposal for the settlement boundary to be moved where is the proposal?</p> <p>From ,Review of settlement boundaries West Berks LPR 2022-39</p> <p>“Settlement boundaries create a level of certainty about whether or not the principle of development is likely to be acceptable.”</p> <p>Considering that, should a settlement boundary be moved without reason within 5 years?</p> <p>From 2011 to 2017 my family and I participated in the HSA DPD as complete amateurs with no planning or Planning Policy skills. We were patiently guided by West Berks Planning Policy through the process of the plan as to the correct pathway. I strongly object to this backward step and question the transparency of this part of the Plan. We hope that we have a voice all be it small one.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Trustees of Allan Snook Will Trust (Represented by Pro Vision)
<p>Consultee Full Name</p>	Trustees of Allan Snook Will Trust
<p>Consultee Organisation</p>	Trustees of Allan Snook Will Trust
<p>Agent Full Name</p>	Gareth Johns
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS1128
<p>Chapter / Policy / Appendix Number</p>	Appendix 2
<p>Chapter / Policy / Appendix Title</p>	Settlement Boundary Review
<p>Order</p>	214
<p>Submission Type</p> <p>* E-Mail</p> <p>* Letter</p> <p>* Other</p> <p>* SMS</p> <p>* Web</p>	E-Mail

* Unknown	
Response Date	02/03/2023 16:09:00
Attached Files	PS1128 Pro Vision (Trustees of the Allan Snook Will Trust) attachment.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>The Council's decision to not take forward the amendment to the settlement boundary at 'land north of Laburnum Cottages, Boxford' is flawed.</p> <p>Background Specifically, this representation is made in relation to our client's land interests at Boxford, particularly 'Land to the north of Laburnum Cottages' and 'Land to the west of Westbrook Cottage'. We have previously submitted to the Council a proposed amendment to the settlement boundary to the north of Boxford – to include the 'land to the north of Laburnum cottages' - as part of the 'emerging draft' LPR Consultation concluding in February 2021. The Settlement Boundary Background Paper (December 2022) demonstrates that the Council suggested inclusion of this land within the settlement boundary (amongst other minor changes) at Boxford – see Map 6 'consultation with town/parish councils', dated March 2021. However, following the consultation with the Parish and their objection, the settlement boundary was revised to exclude our client's site – see Map 6 'proposed submission', dated December 2022. We disagree with this revised assessment/conclusion for the reasons set out below.</p> <p>Housing Delivery</p>

It is considered that there are a number of matters (e.g affordability, boosting supply etc.) that indicate that the proposed housing strategy is flawed and there is justification to increase the housing requirement. Furthermore, the Council's current housing supply would fail to meet the LHN, particularly due to reliance on windfall sites and the strategic allocations.

As such, the settlement boundary review provides an opportunity to proactively identify small-scale/infill sites to boost supply and to help ensure that the Council meets it's housing target.

Submissions to Settlement Boundary Review

'Land to the north of Laburnum Cottages'

Boxford Parish Council strongly objected to the inclusion of 'land to the north of Laburnum Cottages'. The Parish, at Appendix 2 of the Settlement Boundary Background Paper, contend that the site would be an extension to the built up area, rather than infill. Further, that the site is not either functionally or physically or visually related to the existing built-up area.

Contrary to the Parish Council's assessment, the site has a contiguous link with existing dwellings to the south, north, and east. In addition, beyond the road to the west lies further residential development. The land is visually well contained from the wider countryside and landscape and would be seen in the context of the existing residential dwellings and built-up area of the village running along the road.

The land is also within the boundary of the Boxford Conservation Area, which further demonstrates that it is functionally related to the existing built up area of the village. The merits for including the site within the settlement boundary are compelling.

The Council in response to the Parish comments explain that they wanted to "explore the potential for including the site as a single plot or other similar small scale development opportunity which would provide an infill or rounding off opportunity that is physically, functionally and visually related to the existing built up area". Further, the Council acknowledge that "an extension on this side of the road would therefore present a good 'rounding off opportunity'". However, they conclude that given the Parish's strong views, the settlement boundary would not be revised to include this site.

The Council's decision to not take forward this amendment to the settlement boundary is clearly not justified. The Officers professional planning assessment is that the proposed extension to the settlement boundary meets the criteria for inclusion in the settlement boundary. However, the Parish Council's views take precedence over this professional assessment.

As a result, and noting that there is a need to significantly increase the supply of housing in West Berkshire, we are of the view that the Council should re-consider 'land to the north of Laburnum Cottages' for inclusion in the settlement boundary of Boxford – and it would be hard to imagine a more suitable site than this for a small infill development in the settlement boundary.

Land to the west of Westbrook Cottage

With the need to significantly boost supply of housing in West Berkshire, our client notes that the following land in their ownership is also available for inclusion in the settlement boundary of Boxford.

Similarly, the land is visually well contained from the wider countryside and landscape and would be seen in the context of the existing residential dwellings and built-up area of the village.

As such, there is potential to include this land within a revised settlement boundary to accommodate a small-scale infill development. Further, it clearly follows the Council's criteria for land uses to include within the revised settlement boundaries.

Summary

It is considered that the Council should actively seek to identify opportunities to amend the settlement boundaries to deliver small-scale sites, alongside allocations, to meet the Council's housing target. Accordingly, we are of the view that the Council should re-consider the inclusion of 'land to the north of Laburnum Cottages' within the settlement boundary at Boxford, in addition to other land/plots that have been not previously considered in suitable locations such as 'land to the west of Westbrook Cottage'. We trust this Statement clearly sets out our client's position at this stage and respectively request that the above is given due consideration as part of the West Berkshire Local Plan Review.

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

- * Yes
- * No

Please give reasons for your answer

4. Proposed Changes

There is a need to significantly increase the supply of housing in West Berkshire. As such, we are of the view that the Council should re-consider 'land to the north of Laburnum Cottages' for inclusion in the settlement boundary of Boxford and other sites to help ensure that the Council meets it's housing target.

Please refer to attachment (Figure 1 Map) for suggested further amendment to the Boxford settlement boundary.

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

Yes

* Yes * No	
5. Independent Examination	We wish to appear at the examination to present our evidence and technical information to support these representations
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hindocha, Atul (Represented by Iver Consulting Ltd)
Consultee Full Name	Atul Hindocha
Consultee Organisation	
Agent Full Name	Huw Williams
Agent Organisation	Iver Consulting Ltd
Comment ID	PS1678
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:02:00
Attached Files	PS1678 Iver (A. Hindocha) Plan A.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes	Yes

* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Settlement Boundary At present the settlement boundary runs along Lower Way, thereby excluding a development site from the built-up area. We do not understand the reasoning behind this as it is clearly a developed site. We therefore request that the settlement boundary is amended in accordance with Plan A [see attachment PS1678 Iver (A.Hindocha) Plan A] to include our site within the settlement boundary. Concluding Remarks The former Newbury Leisure Park, given it's a redundant brownfield site should be given priority by West Berkshire District Council to enable it to be re-developed prior to the release of greenfield sites.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	
Please give reasons for your answer	
4. Proposed Changes	The settlement boundary that runs along Lower Way should be amended to include the former Newbury Leisure Park site and Moorstream Cottages as this is previously developed land
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	The use of brownfield sites prior to greenfield release should be a fundamental objective of the local plan which needs to be addressed. We would therefore wish to have a seat at the examination.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination	Yes

* Yes	
* No	
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review	Yes
* Yes	
* No	
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Hampstead Norreys Parish Council
Consultee Full Name	Hampstead Norreys Parish Council
Consultee Organisation	Hampstead Norreys Parish Council
Agent Full Name	
Agent Organisation	
Comment ID	PS847
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type	E-Mail
* E-Mail	
* Letter	
* Other	
* SMS	
* Web	
* Unknown	
Response Date	03/02/2023 10:11:00
Attached Files	Hampstead Norreys Parish Council attachment.pdf
1. Do you consider the Local Plan Review is legally compliant?	
* Yes	
* No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.	
* Yes	
* No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by	

<p>the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>HNPC does not feel it is appropriate to include the land known as 'The Paddock' within the settlement boundary as this may then allow for development to occur on this land. Currently, Hampstead Norreys experiences regular closures of Water Street due to the drains being blocked. This has been particularly noticeable over the current winter and Thames Water has been required to do extensive work to maintain the system.</p> <p>As the drainage in Water Street is already unable to cope with the pressure of the surrounding dwellings, it is deemed inappropriate to make The Paddock more susceptible to the development of new dwellings. In Appendix 9, the LPR states the following definition:</p> <ul style="list-style-type: none"> • Settlement boundaries identify the main built up area of a settlement within which development is • considered acceptable in principle, subject to other policy considerations. While allowing for • development, settlement boundaries protect the character of a settlement and prevent unrestricted • growth into the countryside. They create a level of certainty about whether or not the principle of • development is likely to be acceptable. <p>This confirms that the presence of the settlement boundary along the proposed line will leave The Paddock susceptible to development.</p> <p>The LPR states:</p> <p>4.35 Settlements outside of the settlement hierarchy will deliver additional development but this will be limited to infill or change of use within the settlement where a settlement boundary has been defined, and to rural exception schemes for affordable housing to meet local needs. Some limited development is important for the long-term sustainability of rural communities. Outside these settlements, in the countryside, a more restrictive approach to development will be taken as set out in other policies in the LPR . Again, the presumption is that if an area of land is included within the settlement boundary, there is a presumption that it is available for infill development.</p> <p>In Appendix 2 of the LPR, it states:</p> <p>Principles of inclusion of land uses</p> <p>Settlement boundaries identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>West Berkshire Local Plan Review 2022-2039 Proposed Submission Representation Form (20 January – 3 March 2023) Where practicable and barring the exceptions set out below, boundaries will usually follow clearly defined features such as walls, hedgerows, railway lines and roads. Where possible, preference will be given to using features that are likely to have a degree of permanence as some features can change over time. Where development is on one side of the road only, the settlement boundary will be drawn along the edge closest to the settlement. Some boundaries may also follow along the rear of built development in order to prevent inappropriate development, for instance where dwellings have large back gardens.</p> <p>It should be noted that the current proposed settlement boundary line runs across The Paddock but does not follow a clearly defined feature. However, were the settlement boundary to run along the boundary of Red Cottage, these criteria would be met.</p> <p>HNPC therefore strongly requests that the proposed settlement boundary is altered as it is suggesting, to run along the boundary of Red Cottage</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Having reviewed the proposed LPR settlement boundary, Hampstead Norreys Parish Council (HNPC) requests changes be made as per the green line on the attached map. The green line is proposed to run from the current settlement boundary along the rear of the dwellings at Folly View, along the side of the end property, and then drop back along the front of the properties adjacent to the road before running along the boundary of Red Cottage and back up along the rear boundaries of the houses on Water Street.</p>

	HNPC therefore strongly requests that the proposed settlement boundary is altered as it is suggesting, to run along the boundary of Red Cottage
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	CALA Group Ltd (Represented by Pro Vision)
Consultee Full Name	Mr Paul McCann
Consultee Organisation	CALA Group Ltd
Agent Full Name	James Iles
Agent Organisation	Pro Vision
Comment ID	PS1219
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:03:00
Attached Files	PS1215 Pro Vision (CALA Group) (Hungerford)
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need	No

<p>and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p><i>Extract of full representation relevant to this consultation point. For full representation see attachment. Footnotes are included in the attachment.</i></p> <p>We also wish to comment on the Settlement Boundary Review (footnote 17), undertaken as part of the LPR.</p> <p>On a procedural point, we note that the proposed changes to the settlement boundaries were not subject to public consultation at Regulation 18 stage, but consultation was limited to local representatives (Parish Councils and Neighbourhood Plan Groups). We have therefore not had opportunity to comment on how the Council has applied the criteria to settlements and specific contexts and would have wished to have done so prior to Regulation 19 stage.</p> <p>The settlement boundary map for Hungerford (Map 30; previously Map 29) shows a proposed amendment on the southern part of the town. The proposed change appears to represent the new residential development that was previously allocated in the development plans as site HSA18.</p> <p>In terms of the review criteria, the SBR explains that “boundaries will usually follow clearly defined features such as walls, hedgerows, railway lines and roads” (footnote 18).</p> <p>Noting this criteria, and the Town Council’s preference for directing the housing requirement, either all or in part, to site HUN14 (which covers this part of the town), it would be logical and positive plan making to amend the boundary to include all of the remainder of this field, i.e. up to the well-established, treelined hedge boundary that contains the field, and provides a strong, defensible boundary.</p> <p>We note that Town Council’s response to the closed consultation was to align the boundary with the planning permission for land South of Priory Road (footnote 19). By contrast, this does not provide a strong defensible boundary, and follows no obvious physical features on the ground. We contend that the logical boundary, consistent with the review criteria, is to align it as we have described.</p> <p>The area in question is identified in blue mark-up on the following extract of Map 30: <for map see attachment></p> <p>Attachments: full representation including appendix A and B</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	No

Please give reasons for your answer	
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To examine our objections to the development strategy
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Donnington Valley Group (Represented by Barton Willmore now Stantec)
Consultee Full Name	Paul Michael
Consultee Organisation	Donnington Valley Group
Agent Full Name	Ms Patricia Tercerio
Agent Organisation	Barton Willmore now Stantec
Comment ID	PS1350
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 15:46:00
Attached Files	Barton Willmore (DVG) Site boundary.pdf Donnington Valley GC LVA Part 1.pdf Donnington Valley GC LVA Part 2.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan	Yes

<p>provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>We note that the settlement boundary review has been undertaken since the Regulation 18 consultation took place. The Settlement Boundary Review (SBR) (December 2022) includes the proposed new settlement boundary for Donnington, which we note does not significantly differ from the current settlement boundary.</p> <p>In limiting the ambition of the settlement boundary review, the Council has overlooked the opportunity to consider potential for development on well-located sites in close proximity to existing settlements.</p> <p>Within our representations to the Regulation 18 Consultation, we commented that we disagree with the Council's approach of relying on larger sites and ruling out sites within smaller settlements and only allocating sites which fall within the service villages, rural service villages or urban areas. The Regulation 19 Draft Local Plan follows suit in its approach to allocating sites for housing development, as evidenced by the allocated sites Sanddeford Park (1,500 dwellings) and North-East Thatcham (1,500 dwellings). As such, we maintain that the Council should seek to accommodate further growth across the district. The Council's approach, in our view, is not consistent with the NPPF.</p> <p>The Landscape and Visual Appraisal Note which accompanies these representations shows that our client's site at Donnington Valley Golf Course could accommodate housing development which would assist the Council in reducing reliance on larger sites. Whilst the principles of delivering large sites with accompanying infrastructure is supported by national planning policy, and we do not object to these allocations, we raise concern that the numbers suggested may not be delivered within the plan period. In particular, large allocations require substantial infrastructure to be delivered prior to any housing delivery. Increased small and medium scale sites would complement the larger sites by ensuring a constant stream of delivery whilst larger sites start to mobilise. A modest area of development (50-100 dwellings) at Donnington Valley Golf Course would provide a suitable additional allocation to be delivered in the short term and compliment the longer-term allocations.</p> <p>At paragraph 79, the NPPF states:</p> <p>"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."</p> <p>The Council's approach to rule out sites which are outside of the settlement hierarchy (at stage 3 of the site selection process), without considering the site-specific benefits of such sites, is inconsistent with the above paragraph of national planning policy. The approach also overlooks the circumstances relevant to settlements such as Donnington which, whilst below the Council's settlement hierarchy, has a close</p>

	functional relationship to Newbury and, therefore, benefits from the services and facilities in Newbury which are readily accessible.
3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No	Yes
Please give reasons for your answer	
4. Proposed Changes	Based on the comments above, we request the following: <ul style="list-style-type: none"> • The Council to reconsider the scope of the settlement boundary review around Donnington to include our client's site. • Reconsider the overreliance on larger sites through the allocation of more small / medium sites. • Consider the allocation of sites within lower-order settlements of the settlement hierarchy. The above will ensure that this approach is 'effective', 'justified' and 'consistent with national policy.'
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Thatcham Town Council
Consultee Full Name	Ms Mel Taylor
Consultee Organisation	Thatcham Town Council
Agent Full Name	
Agent Organisation	
Comment ID	PS1706
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 16:32:00

Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	<p>Appendix 2 of the draft Local Plan defines Settlement Boundaries as follows: "They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations."</p> <p>This definition creates a presumption in favour of development unless this would conflict with policies within the Local Plan.</p> <p>The area for housing will in any case need to be reduced from what was envisaged in the Strategic Growth Study, in order to deliver the housing densities defined in the West Berkshire Density Pattern Book. The settlement boundary needs to reflect this.</p> <p>Appendix 2 states that "Boundaries will exclude: Recreational or amenity open space which extends into the countryside or primarily relates to the countryside in form and nature. This includes designated Local Green Space." The map on page 65 shows three areas of "Country Park / Public Open Space" adjacent to the 'site boundary'. These are clearly 'recreational or amenity open space' – so must be outside the settlement boundary. However, there is no supporting evidence to support their location and size – so their position on the map must be considered at present to be indicative.</p> <p>Paragraph 6.58 of the draft Local Plan states: "The new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage."</p> <p>The 'red line' boundary map of the map on page 65 of the draft Local Plan is described as the "North East Thattham Site Boundary" – i.e. the boundary of site THA20. However, this same boundary has been incorrectly transferred to the Policies Map and shown in map 46: Thattham E of the Settlement Boundary Review paper as the settlement boundary.</p>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	N/A
<p>4. Proposed Changes</p>	<p>The term “settlement boundary” is not used in legislation or Government guidance on planning. There is therefore no requirement for a site allocation in a Local Plan to fall within a settlement boundary. It is clearly premature to specify any new settlement plan, and incompatible with paragraph 6.58 of the draft Local Plan.</p> <p>The map on page 65 of the draft Local Plan provides a way forward, because it shows the boundary of the site, rather than the settlement boundary:</p> <p>(i) Paragraph 6.58 needs to be modified as follows: “The new revised settlement boundary will be defined within the <u>‘North East Thattham Site Boundary in the accompanying map.’</u> following the studies and work identified in the policy for a development of <u>at most approximately 1,500 dwellings</u> at the application stage. <u>The settlement boundary will exclude any country park or public open space on the edge of the development</u>” <i>(added text is underlined)</i></p> <p>(ii) The settlement boundary on the Policies Map needs to be restored to its current position – along Bath Road and Floral Way, in accordance with Paragraph 6.58 of the draft Local Plan.</p> <p>(iii) A revision of the document ‘Settlement Boundary Review (SBR) December 2022’ needs to be published, in which ‘Map 46: Thattham E’ is amended to show the settlement boundary in its current position – along Bath Road and Floral Way.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	Yes
<p>5. Independent Examination</p>	<p>Thattham Town Council is the principal representative body of the community of Thattham, which is the location of only new strategic site allocation in the draft Local Plan. The suitability of this site for development is reliant on having adequate infrastructure. However, the regeneration that was promised in the current Local Plan has not materialised, and would not be delivered through the policies in the draft Local Plan. The Town Council can provide local insight to the examination about Thattham, and particularly on the substantial deficit of infrastructure in the locality. It would also be happy to elaborate on its other concerns about the current proposals for the North East Thattham Strategic Site Allocation, as described in these representations.</p> <p>The Town Council anticipates that changes necessary to the draft Local Plan in relation to site allocations are greater than could be addressed through ‘main modifications’. If, however, the Inspector is minded to consider recommending ‘main modifications’ to policy SP17 and related matters in other Policies, it would welcome the opportunity to provide its perspective on what modifications would be required.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	Yes

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	McElhinney, Siobhan (Represented by Woolf Bond Planning)
Consultee Full Name	Miss Siobhan McElhinney
Consultee Organisation	
Agent Full Name	Mr Douglas Bond
Agent Organisation	Woolf Bond Planning
Comment ID	PS1572
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 17:47:00
Attached Files	PS1572 Woolf Bond (S. McElhinney) LPR Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather	Yes

<p>than deferred, as evidenced by the statement of common ground.</p> <p>* Yes</p> <p>* No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>Introduction</p> <p>We refer to the above consultation event and respond on behalf of our client, Ms S McElhinney who have interests with respect of land located east of Little Lane, Upper Bucklebury. As explained below, land east of Little Lane, Upper Bucklebury should be included in the defined settlement boundary of the village when considered against the Council's criteria for definition (as outlined in appendix 2 of the Draft Submission Plan), including its application elsewhere in the district. The omission of land east of Little Lane, Upper Bucklebury is therefore a clear illustration of inconsistency within the Draft Submission Local Plan and therefore that it is unsound, of the basis of not being justified.</p> <p>National Planning Policy Framework (NPPF) and the Tests of Soundness</p> <p>The NPPF (July 2021) sets out the principal components to be included in local plans. Paragraph 35 requires that in order to be "sound" a Development Plan Document ('DPD') should be positively prepared, justified, effective and consistent with national policy.</p> <p>In order to be justified the DPD must be founded upon a proportionate evidence base and represent an appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the Statement of Common Ground.</p> <p>The positive preparation test requires plans to as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical.</p> <p>For the reasons set out in these submissions there are a number of potential matters that need to be addressed in future iterations of the emerging Plan. These are outlined following the relevant policies and supporting information within the Draft Submission Local Plan.</p> <p>Review of settlement boundaries</p> <p>Irrespective of the objection to the Council's categorization of settlements, we also dispute the application of the methodology for defining settlement boundaries as detailed in appendix 2 of the Draft Submission Plan. The Council's proposed approach has unjustifiably excluded the existing dwellings along Byles Green, to the east of Little Lane, Upper Bucklebury, whereas had it consistently applied its methodology these would have been included.</p> <p>The Council's methodology as detailed in appendix 2 states the following " principles for inclusion of land uses":</p> <p>Settlement boundaries identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>Where practicable and barring the exceptions set out below, boundaries will usually follow clearly defined features such as walls, hedgerows, railway lines and roads. Where possible, preference will be given to using features that are likely to have a degree of permanence as some features can change over time. Where development is on one side of the road only, the settlement boundary will be drawn along the edge closest to the settlement. Some boundaries may also follow along the rear of built development in order to prevent inappropriate development, for instance where dwellings have large back gardens.</p> <p>The analysis above when determining the population of Upper Bucklebury is an illustration of the potential extent of the main built up area of the village, and this thus a useful aid.</p> <p>Appendix 2 of the Draft Submission Plan confirms that "Boundaries will include":</p> <ul style="list-style-type: none"> • The main settlement area. i.e. the area of close knit physical character • Residential sites allocated through the Local Plan and neighbourhood plan processes • Curtilages which are contained, are visually part of the built up area and are separated from the open or wider countryside • Recreational or amenity open space which is physically surrounded by the settlement (or adjoined on three sides by the settlement) • Existing community facilities (such as churches, schools and village halls) which are physically and visually related to the settlement

- **Single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built up area, taking account of any environmental development constraints.**

Within the criteria, it is important to emphasize the role of those areas with a close knit physical character and equally important that recreational or amenity space can be included within the proposed boundaries, even where it is surrounded on three sides by the settlement.

The current and proposed boundaries for Upper Bucklebury are illustrated in the Settlement Boundary Review Background Paper (December 2022) within map 53 and are shown below

[for map, see page 6 of attachment 'PS1572 Woolf Bond (S. McElhinney)].

The proposed boundary of the Local Plan entails the removal of the existing amenity/open space area to the east of Little Lane even though it is enclosed on at least three sides by existing development. This is considered to be contrary to the clear approach that the Council indicated that it would follow.

However, our view is that rather than omitting the open space east of Little Lane from the settlement boundary for Upper Bucklebury, this should be retained and also that the dwellings that lie to its north (off Byles Lane) should also be included. Our advocated amended settlement boundary is shown below (blue dashed line)

[for map, see page 7 of attachment 'PS1572 Woolf Bond (S. McElhinney)].

The retention of the existing area of open space east of Little Lane, Upper Bucklebury within the settlement boundary whilst adhering to the Council's methodology would also reflect its approach for similar areas of open space in settlements like Burghfield Common and Chieveley as illustrated below.

Area of open space enclosed on up to three sides in Burghfield Common included in the settlement boundary

[for map, see page 7 of attachment 'PS1572 Woolf Bond (S. McElhinney)]

Area of open space enclosed on up to three sides in Burghfield Common included in the settlement boundary

[for map, see page 8 of attachment 'PS1572 Woolf Bond (S. McElhinney)]

The exclusion of the open space east of Little Lane, Upper Bucklebury from the defined settlement boundary is therefore an illustration of the inconsistent application of the Council's methodology.

Furthermore, and irrespective of this, the Council in other settlements has included linear tongues of residential development within the defined settlement and this should therefore apply to the dwellings along Byles Green, Upper Bucklebury. Had this been done, the open space as analyzed above would have been included in the defined settlement as it would have been encircled by existing development. This is therefore a further reason for making the adjustment to the settlement boundary advocated.

Some of the examples of where linear residential development is included in the proposed settlement boundary are shown below. As indicated, the approach of the Local Plan has not sought to apply its methodology consistently and therefore it is not justified.

The area in south-east Brightwalton includes a tongue of residential development included in the settlement as shown below

[for map, see page 9 of attachment 'PS1572 Woolf Bond (S. McElhinney)].

Linear development in Brightwalton Green included in a settlement boundary as shown below

[for map, see page 9 of attachment 'PS1572 Woolf Bond (S. McElhinney)].

Linear development to the south-west of Pangbourne included in a settlement boundary

[for map, see page 10 of attachment 'PS1572 Woolf Bond (S. McElhinney)].

The revision to Upper Bucklebury's settlement boundary as advocated would address the concerns on soundness outlined above, and would also provide scope to support additional development in the village to support and enhance the vitality and viability of existing services, a benefit for existing residents which already totals over 1,000 together with future ones.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>That to address the soundness concerns, the following amendments to the policy are made: 3. That the settlement boundary of Upper Bucklebury is revised to both retain the existing open space east of Little Lane and include the dwellings of Byles Green.</p>

	<Part of a wider representation - see attached document PS1572 Woolf Bond (S. McElhinney)>
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	To clarify the adjustments to policy SP3 of the Local Plan
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Bucklebury Parish Council (Represented by Andrew Black Consulting)
Consultee Full Name	Bucklebury Parish Council
Consultee Organisation	Bucklebury Parish Council
Agent Full Name	Andrew Black
Agent Organisation	Andrew Black Consulting
Comment ID	PS1289
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	01/03/2023 21:11:00
Attached Files	Andrew Black Consulting (Bucklebury PC) Full Rep.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring	No

<p>areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	No
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>[See attachment 'Andrew Black Consulting (Bucklebury PC) Full Rep' for full consultation response]</p> <p>The Settlement Boundary Review (SBR) Paper (December 2022) also forms part of the evidence base for the LBR. Paragraph 12 of the paper sets out the following:</p> <p><i>In Spring 2020, the council gave all town/parish councils and neighbourhood planning (NDP) groups across the District an opportunity to undertake an initial review of boundaries themselves. Officers held three workshops in Calcot, Newbury and Hungerford in February 2020 outlining the work involved and then followed this up with further written advice and maps showing existing boundaries to encourage community involvement.</i></p> <p>The SBR Paper goes onto state at paragraph 15:</p> <p><i>As far as possible the council used the results from this exercise as a clear community steer for the way forward and considered this information alongside the evidence contained in existing landscape character assessments and other relevant documents referred above. At the same time, a number of requests that had been submitted, as part of the Local Plan Review, by residents and other developers for small extensions to boundaries in some settlements were also considered. An 'on the ground' review of all the settlements across West Berkshire was completed by officers in 2021 and proposed boundaries were drawn up.</i></p> <p>The position set out within the SBR Paper and responses summarised in appendix 1 are misleading and represent a failure in due process as part of the site selection process and setting of settlement boundaries. Thatcham Town Council and BPC were not adequately consulted as part of this process and their comments were not accurately recorded. The response that was submitted by BPC is included in appendix 1 of these representations.</p> <p>Appendix 1 - BPC Comments on Thatcham North East Settlement Boundary Review</p> <p><u>Introduction</u></p> <p>Bucklebury Parish Council (BPC) strongly OBJECTS to the proposed settlement boundary for Thatcham North East.</p> <p>WBC's consultation request on this proposed settlement boundary (SB) change was sent to some parties, but not BPC, on or about 9th March 2021. Bucklebury parish boundary is but metres from the proposed SB so it is hard to understand why WBC would consider that BPC lacked a legitimate interest in this matter. The initial boundary review took place in Feb-Mar 20 of which BPC was not informed. Given the wider circumstances at that time, it is understandable that Parish Councils did not search out the changes that were proposed for their neighbours. The consultation is lacking in its communication.</p> <p>BPC has had the benefit of reading the comments on this boundary review by Thatcham Town Council and adopts and endorses those in this response.</p> <p><u>Consultation Process</u></p>

It is BPC's view that the consultation process is flawed in that it fails any test of 'community involvement'. WBC failed to inform BPC of the proposed changes to the SB that lies just over the parish boundary. This casts doubt on the integrity and legitimacy of the whole LPR consultation, which WBC states will be a "...a detailed 'on the ground' community led assessment ...". As SB changes are an important part of the proposed Draft Local Plan consultation, not involving bordering Parish Councils, and arguably individuals, means that the local populations are not being adequately consulted on the entirety of the Local Plan review.

BPC expects WBC to launch a new and meaningful consultation to take account of the views of all communities affected by the proposed settlement boundary change.

Strategic Gap

A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this boundary change proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates that separation and will visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to both refuse planning applications and to remove site allocations from the HELAA process eg THA9, CA16. The description of CA16 in the HELAA documents acknowledges that the Thatcham - Upper Bucklebury Strategic Gap would be sacrificed and the separate identity of Upper Bucklebury lost, despite WBC's stated intent to "protect the character of a settlement..."

It should be noted that the treatment of the 'country park' within THA20 causes particular concern. The SBR documentation states that: "1. Boundaries will exclude: Recreational or amenity open space which extends into the countryside or primarily relates to the countryside in form and nature. This includes designated Local Green Space." There appears to be no provision for this necessary protection - a change in the plan could see building to the proposed settlement boundary and the 'country park' lost. There must be some provision to limit the SB to the edge of the proposed building line to protect the 'country park' from any development.

Landscape Setting

The Landscape Character Assessment LCA Section WH4 states "Open farmland on the lower slopes contributes to a sense of separation between the elevated character area and the towns of Thatcham and Newbury in the valley below." This sense of partition and openness is amplified in the Landscape Sensitivity Study (LSS): Thatcham "LLCA14F: Colthrop Manor Plateau Edge...forms an important ... rural transition zone between the urban area and the AONB," "Lower slopes of important ridgeline," "Good views across the area and long views across the Kennet Valley," and "The area is highly visible from the Kennet Valley and the Greenham escarpment"

The SBR documentation states that "1. Boundaries will exclude: Highly visible areas such as exposed ridges, land forms or open slopes..." and "Specific issues to be considered...The wider setting and important views both into and out of the settlement will... be taken into account..."

WBC should reconsider the proposed SB in light of its own guidance. Account should also be taken of the proximity of the ancient woodland and the historic settlement at Siege Cross Farm. WBC should also review the landscape-based defence it put forward to oppose the previous development proposal at Siege Cross, and recognise the failings of this SB change proposal.

AONB and The Common

The proposed SB would inevitably have a lasting negative impact on these special environs that WBC is specifically charged, through legislation and its own Strategic Objectives, with protecting.

Not only would the AONB settlement pattern be distorted by the movement of the SB (as acknowledged in the comments in CA12 of the Site Selection Paper), but Bucklebury Common, part of the AONB, would be irretrievably damaged. The impacts would fall into two categories: those that would impact the Common directly, and those resulting from the inevitable increase in visitors. The Common requires protection because of its flora, fauna and AONB situation; it contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. These would be put under increased pressure if the SB were moved to the proposed location and building could literally overlook and overshadow the delicate ecosystems. Increased footfall would inevitably exacerbate the direct damage caused by the effects of the SB change.

Exclusion of a more adequate "country park" from the Thatcham North East proposed settlement boundary would be a starting point in protecting the Common, but the AONB would only be truly protected if WBC was to reconsider this entire proposal in light of its strategic objectives.

Conclusion

Thatcham North East is a deeply unpopular plan that is marked by flawed execution of the consultation process. In what is a fundamental part of the progression of the LPR, WBC has failed to adequately consult all the communities, and all community members, in the areas surrounding the proposed settlement boundary changes. The area delineated by the settlement boundary itself is too close to the AONB and fails to adequately protect it, and inadequate weight appears to have been given to the effects on the landscape.

BPC **strongly OBJECTS** to the proposed site settlement boundary changes at Thatcham North East.

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>BPC has wider concerns around the way in which WBC has undertaken the consultation process for the LPR and the Duty to Cooperate in general. Failings with Duty to Cooperate are matters which are not</p>

	capable of being remedied in advance of the plan being submitted for examination. BPC will set out further details of these failings to the inspector should the plan be submitted to the Planning Inspectorate by WBC.
4. Proposed Changes	
5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No	Yes
5. Independent Examination	Bucklebury Parish Council wishes to participate in the examination process and will be presenting further evidence through the submission of matters statements and oral evidence from experts. To provide updated evidence to the examiner. For other relevant experts employed by parish council to give detailed technical views on matters.
6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No	Yes
6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No	Yes
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Manly, Charles
Consultee Full Name	Charles Manly
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1866
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/03/2023 15:06:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? -	

<p>Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>* Yes * No</p>	
<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	

<p>Please give reasons for your answer</p>	<p>I am the joint owner of a plot of land and garage on Morphetts Lane Chieveley included in the 2017 HSA DPD as CHI016 under boundary Changes too Small to allocate now called CHI014. It has been in family ownership for 53 years, Morphetts lane used as an access at all times with or without vehicles and a right established to drive on the footpath. As such a prescriptive access is noted on the HMLR title gained by long use.</p> <p>Any questions regarding this I am happy to answer.I have not been consulted.</p> <p>I apologise for my late response and hope that my letter will be included in the consultation and put forward to the inspector when he is appointed.</p> <p>I have been following closely the stages of the Local Plan Review in which it was stated that settlement boundary maps would be included in the plan by the spring of 2021.</p> <p>I was unable to locate these and there was no written reference to boundary changes for Chieveley that I could find.</p> <p>It has now come to my attention that there is a proposal for the settlement boundary to the North of the Village of Chieveley to revert to its pre 2017 HSA DPD position.</p> <p>There seems to be no evidence put forward for this and the change would appear to be arbitrary.</p> <p>Chieveley Parish Council wrote in response to Consultation on the LPR 2022-39 settlement boundary review in 2020 page 136</p> <p>“The settlement boundaries were reviewed for the housing site Allocations Development Plan Document adopted in May 2017.Nothing has changed since then.The settlement boundaries for Chieveley and Courage seem appropriate the Parish Council is unaware of any compelling need to Change them”</p> <p>In this document the response from West Berks Council Certainly does not mention changes to the settlement boundary North of the village.</p> <p>The Kirkham Landscape report is used as base evidence for the 2022-2039 LPR in which it highlights that in this part of the village there would be no harm to the landscape from some development.</p> <p>The 2017 HSA DPD was a rigorously researched and endlessly consulted upon ,legal document.Is there any evidence to say the settlement boundary of Chieveley was established in the wrong location?</p> <p>If there is a proposal for the settlement boundary to be moved where is the proposal?</p> <p>From ,Review of settlement boundaries West Berks LPR 2022-39</p> <p>“Settlement boundaries create a level of certainty about whether or not the principle of development is likely to be acceptable.”</p> <p>Considering that, should a settlement boundary be moved without reason within 5 years?</p> <p>From 2011 to 2017 my family and I participated in the HSA DPD as complete amateurs with no planning or Planning Policy skills. We were patiently guided by West Berks Planning Policy through the process of the plan as to the correct pathway.</p> <p>I strongly object to this backward step and question the transparency of this part of the Plan.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	
<p>Event Name</p>	<p>Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039</p>

Bookmark	Pike, Simon
Consultee Full Name	Simon Pike
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1808
Chapter / Policy / Appendix Number	Appendix 2
Chapter / Policy / Appendix Title	Settlement Boundary Review
Order	214
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 16:08:00
Attached Files	S Pike Attachment 2.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	N/A
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable	No

<p>development in accordance with the policies of the NPPF.</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>[Same comments submitted in PS1343 under Policy SP17]</p> <p>[See attached document Attachment 2]</p> <p>Appendix 2 of the draft Local Plan defines Settlement Boundaries as follows: "They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations."</p> <p>This definition creates a presumption in favour of development unless this would conflict with policies within the Local Plan.</p> <p>The area for housing will in any case need to be reduced from what was envisaged in the Strategic Growth Study, in order to deliver the housing densities defined in the West Berkshire Density Pattern Book. The settlement boundary needs to reflect this.</p> <p>Appendix 2 states that "Boundaries will exclude: Recreational or amenity open space which extends into the countryside or primarily relates to the countryside in form and nature. This includes designated Local Green Space." The map on page 65 shows three areas of "Country Park / Public Open Space" adjacent to the 'site boundary'. These are clearly 'recreational or amenity open space' – so must be outside the settlement boundary. However, there is no supporting evidence to support their location and size – so their position on the map must be considered at present to be indicative.</p> <p>Paragraph 6.58 of the draft Local Plan states: "The new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage."</p> <p>The 'red line' boundary map of the map on page 65 of the draft Local Plan is described as the "North East Thattham Site Boundary" – i.e. the boundary of site THA20. However, this same boundary has been incorrectly transferred to the Policies Map and shown in map 46: Thattham E of the Settlement Boundary Review paper as the settlement boundary.</p> <p>The 'Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire: Report Thattham (August 2015)' by Kirkham Landscape Planning Ltd provides an assessment for site THA11, which is adjacent to the settlement boundary of Thattham to its north. The existing housing adjacent to this site extends to a higher elevation AOD than the nearest housing to SP17.</p> <p>This report concludes for THA11:</p> <p>"It is recommended that only part of the site should be pursued further as a potential housing site ... to conserve and enhance the AONB and to maintain the character of the land north of Thattham:</p> <ul style="list-style-type: none"> - The potential development area is ... limited to land on the lower slopes lying below the 95m AOD contour" <p>West Berkshire Council has commissioned studies of landscape capacity for a substantial part of this site in relation to a planning appeal for a previous application for Siege Cross. West Berkshire Council's expert witness on landscape was Bettina Kirkham DipTP BLD CMLI. The summary of her Statement of Case to the appeal inquiry provides the following conclusion:</p> <p>"The site contains pasture farmland, within well-established woodlands, and mature hedgerows. It is also on rising exposed ground which forms the southern flank of the open countryside hillside ridge of the AONB above Thattham. Extending from 75m AOD to 105m AOD, the proposed development area lies well above the local limit of development of 90m AOD and above the limit within eastern Thattham of 95m AOD. The proposed development on the appeal site would therefore be an extensive arm into this open elevated and prominent landscape. It is clearly not a logical extension to Thattham as it will intrude into an overwhelmingly rural landscape, which forms an intrinsic part of the wider landscape between the AONB and Thattham, well beyond a clearly defined and established landscape boundary to the settlement."</p> <p><i>This document is provided as Attachment 2 to my representations (paragraph S.12 is copied above).</i></p> <p>Therefore, the available evidence on the landscape character and capacity for the North East Thattham site indicates that development should not extend above the 95m AOD contour, and probably not above the 90m AOD contour.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes</p> <p>* No</p>	
<p>Please give reasons for your answer</p>	<p>N/A</p>
<p>4. Proposed Changes</p>	<p>The term "settlement boundary" is not used in legislation or Government guidance on planning. There is therefore no requirement for a site allocation in a Local Plan to fall within a settlement boundary. It is clearly premature to specify any new settlement plan, and incompatible with paragraph 6.58 of the draft Local Plan.</p> <p>The map on page 65 of the draft Local Plan provides a way forward, because it shows the boundary of the site, rather than the settlement boundary:</p> <p>(i) Paragraph 6.58 needs to be modified as follows: "The new revised settlement boundary will be defined <u>within the 'North East Thattham Site Boundary in the accompanying map.'</u> following the studies and work identified in the policy for a development of <u>at most approximately 1,500 dwellings</u> at the application</p>

	<p>stage. <u>The settlement boundary will exclude any country park or public open space on the edge of the development</u>". (added text is underlined)</p> <p>(ii) The settlement boundary on the Policies Map needs to be restored to its current position – along Bath Road and Floral Way, in accordance with Paragraph 6.58 of the draft Local Plan.</p> <p>(iii) A revision of the document 'Settlement Boundary Review (SBR) December 2022' needs to be published, in which 'Map 46: Thatcham E' is amended to show the settlement boundary in its current position – along Bath Road and Floral Way.</p> <p>If however, the Examination concludes that it is appropriate to modify the settlement boundary for North East Thatcham at this time, the extended settlement boundary should extend no further than the 95m AOD contour, in line with the recommendations of the "Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire: Report Thatcham (August 2015) and the statements of West Berkshire Council's expert witness for landscape at the Planning Appeal for the application for Siege Cross.</p> <p>If, however, the Examination concludes that it is appropriate to extend the settlement boundary for North East Thatcham at this stage (which I would not support, because this needs further analysis), the new settlement boundary should certainly not extend above the 95m contour, and probably not above the 90m contour, in accordance with the best available evidence on landscape.</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>5. Independent Examination</p>	If it would assist the examination.
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes</p> <p>* No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes</p> <p>* No</p>	Yes

Appendix 3 AWE land use planning consultation zones

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Charlesgate Homes Limited
Consultee Full Name	Mr Joe Atkinson
Consultee Organisation	Charlesgate Homes Limited
Agent Full Name	
Agent Organisation	
Comment ID	PS720
Chapter / Policy / Appendix Number	Appendix 3
Chapter / Policy / Appendix Title	AWE land use planning consultation zones
Order	216
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 14:13:00
Attached Files	Charlesgate Homes response to AWE depz zone.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	No
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p>The proposed development site is within the Detailed Emergency Planning Zone of AWE Burghfield. While there is no blanket ban on new people being accommodated in this area the local authorities have been citing it as a barrier to obtaining planning permission.</p> <p>This document (<i>see attached document Charlesgate Homes_response to AWE DEPZ zone</i>) sets out to show that because of the distance between the development site and the AWE site the risks posed by the AWE site to residents of any new development would be very low compared to normal day to day risks and that the development itself poses no risk to the AWE site nor to the operation of the local authority's off-site plan.</p> <p>The first argument is that the probability of an accident leading to a significant release of radioactive material to the atmosphere is low. It is argued that this is below 1 in 10,000 years, probably much lower.</p> <p>The consequences of this accident, as deduced from the AWE's Consequence Report, at the distance of the development site would be classed as "minor" using the REPPPIR risk framework.</p> <p>As the site is beyond the range recommended for prompt protective actions by AWE. No protective actions would be needed at the development site even if the wind blew towards the site and the weather conditions were such as to minimise dispersion.</p> <p>The estimates risk of death at the development site due to an accident on the AWE site is estimated to be far lower than the risk of a fatal lightning strike.</p> <p>As it is beyond the AWE range for protective actions, the development site need not be in the DEPZ. Some options for the route of the DEPZ boundary are discussed.</p> <p>As the off-site plan is to inform the residents of the area using an automatic phone system and then set up an information gathering and decision-making process in the Strategic Coordination Centre, the added number of people in the DEPZ do not impose any load on the off-site plan.</p> <p>As the site is beyond the urgent protective action zone the emergency services and home support services should be allowed to operate as normal within the area of the development site even during the short release phase as an accident at the AWA site.</p> <p>The risks at the site are compared to the ONR criteria for recommending against a development and it is concluded that the ONR should be comfortable not objecting to this development.</p> <p><i>Full representation is set out in the attached document >Charlesgate Homes_Response to AWE DPEZ zone></i></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>

6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review

- * Yes
- * No

Yes

Appendix 4 Designated Employment Areas

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS903
Chapter / Policy / Appendix Number	Appendix 4
Chapter / Policy / Appendix Title	Designated Employment Areas
Order	219
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</i></p> <p>APPENDICES</p> <p>No time to review in Detail but a general comment is the lack of maps within documents and the lack of ability to pull together data for a Specific Spatial Area and important Sub Areas.</p> <p>Appendix 4 – should include the Detailed Map for each of the listed DEA as they are not available on GIS and the Policies Map does not appear to be GIS enabled??</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Appendix 5 Residential Parking Zones

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Ridgepoint Homes Ltd
Consultee Full Name	Miss Emma Runesson
Consultee Organisation	Ridgepoint Homes Ltd
Agent Full Name	
Agent Organisation	
Comment ID	PS209
Chapter / Policy / Appendix Number	Appendix 5
Chapter / Policy / Appendix Title	Residential Parking Zones
Order	221
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	22/02/2023 16:47:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	We believe that the Plan accords with the requirements of the relevant legislation.
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	Yes
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	Yes

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>In reference to the Residential Parking Zone - Pangbourne, Theale and Eastern Settlements map, we suggest that Zone 1 in Theale is extended westwards to include the site at "Lakeside, The Green, Theale". A Location Plan of the site is enclosed for reference.</p> <p>The site benefits from an extant outline planning permission for up to 325 units (ref: 15/02842/OUTMAJ) as well as an extant detailed permission for 350 units (ref: 04/01219/FULMAJ). Both of these applications introduce a requirement to deliver a pedestrian and cycle route to Station Road. This would therefore reduce journey times to the station and enhance the sustainability of the site, justifying reduced parking standards.</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>Please give reasons for your answer</p>	<p>We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.</p>
<p>4. Proposed Changes</p>	<p>In reference to the Residential Parking Zone - Pangbourne, Theale and Eastern Settlements map, we suggest that Zone 1 in Theale is extended westwards to include the site at "Lakeside, The Green, Theale".</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	<p>N/A</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>

Residential Parking Zone - Pangbourne, Theale and Eastern Settlements

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1481
Chapter / Policy / Appendix Number	
Chapter / Policy / Appendix Title	Residential Parking Zone - Pangbourne, Theale and Eastern Settlements
Order	224
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	<p>Pangbourne Zone 2 and Eastern Urban Area zones overlap, causing potential confusion as to which parking standard applies</p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Map should be re-drawn to avoid zones overlapping</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	<p>No</p>
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	<p>Yes</p>

Appendix 6 How policies are applied in a neighbourhood planning context

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Macro, Alan
Consultee Full Name	Councillor Alan Macro
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS1482
Chapter / Policy / Appendix Number	Appendix 6
Chapter / Policy / Appendix Title	How policies are applied in a neighbourhood planning context
Order	225
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	03/03/2023 13:21:00
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	Yes
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	This section should be removed from the LPR.
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	No
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes

Appendix 7 Schedule of policies to be superseded/ deleted

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Limes Leisure Investments (Represented by Knight Frank)
Consultee Full Name	Limes Leisure Investments
Consultee Organisation	Limes Leisure Investments LLP
Agent Full Name	Emily Brosnan
Agent Organisation	Knight Frank
Comment ID	PS602
Chapter / Policy / Appendix Number	Appendix 7
Chapter / Policy / Appendix Title	Schedule of policies to be superseded/ deleted
Order	227
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	Web
Response Date	03/03/2023 10:47:14
Attached Files	
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>The draft Local Plan proposes to not carry forward site allocation policies from the West Berkshire Core Strategy 2006-2026 and Housing Site Allocations DPD 2006-2026. These policies include "CS2 Newbury Racecourse strategic site allocation". This proposed deletion is also referenced in the Sustainability Appraisal (Para. 5.3.2.1).</p> <p>The draft Local Plan explains the policies are not carried forward "as they have either been built out or are nearing completion."</p> <p>In terms of planning status, the site has outline consent for 1,500 new dwellings, in accordance with the policy, however not all of the reserved matters applications have come forward. Therefore, we suggest that it is not built out or nearing completion.</p> <p>The sustainability and suitability of the site for future development is not in question, and therefore we suggest that as a location for future development it is not discounted by the new Local Plan. It could also deliver additional growth in the future e.g. at the Nuffield Health site. The site is deliverable and suitable for future development.</p> <p>We recommend that through the Local Plan the Council does not prevent future development at the "racecourse" site. By adopting this approach the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land (previously developed land).</p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	
<p>5. Independent Examination</p>	
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	

Appendix 8 Housing Trajectory

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Newbury Racecourse (Represented by Pro Vision)
Consultee Full Name	Newbury Racecourse
Consultee Organisation	Newbury Racecourse
Agent Full Name	Gareth Johns
Agent Organisation	
Comment ID	PS524
Chapter / Policy / Appendix Number	Appendix 8
Chapter / Policy / Appendix Title	Housing Trajectory
Order	229
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 15:14:00
Attached Files	Pro Vision (Newbury Racecourse).pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.</p> <p>* Yes * No</p>	No
<p>Please give reasons for your answer</p>	<p>Please see accompanying statement for our full representations.</p> <p>The housing trajectory likely to lead to a shortfall of housing across the plan period due to reliance on windfall sites and large strategic sites (e.g Sandford and NE Thatcham) that are questionable in terms of their deliverability and overly optimistic assumptions about delivery rates.</p> <p><Accompanying statement attached></p>
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate?</p> <p>* Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please see accompanying statement for our full representations.</p> <p>The housing trajectory will need to be updated given the need to allocate additional sites for housing over the plan period. It is also considered that the Plan at Appendix 8 should include the individual phasing of sites to assist monitoring.</p> <p><accompanying statement attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?</p> <p>* Yes * No</p>	Yes
<p>5. Independent Examination</p>	We wish to appear at the examination to present our evidence and technical information to support these representations
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination</p> <p>* Yes * No</p>	Yes
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review</p> <p>* Yes * No</p>	Yes
<p>Event Name</p>	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
<p>Bookmark</p>	Rivar Ltd (Represented by Pro Vision)
<p>Consultee Full Name</p>	Rivar Ltd
<p>Consultee Organisation</p>	Rivar Ltd
<p>Agent Full Name</p>	Gareth Johns
<p>Agent Organisation</p>	
<p>Comment ID</p>	PS578
<p>Chapter / Policy / Appendix Number</p>	Appendix 8

Chapter / Policy / Appendix Title	Housing Trajectory
Order	229
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	02/03/2023 09:37:00
Attached Files	Pro Vision (Rivar) full response.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No	No
Please give reasons for your answer	Please see accompanying statement for our full representations. The housing trajectory likely to lead to a shortfall of housing across the plan period due to reliance on windfall sites and large strategic sites (e.g Sandleford and NE Thatcham) that are questionable in terms of their deliverability and overly optimistic assumptions about delivery rates. <i>Full representation attached. Further comments relating to housing numbers and the trajectory have been logged against SP12 (Rep ID: PS570)</i>

<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	<p>Please see accompanying statement for our full representations. The housing trajectory will need to be updated given the need to allocate additional sites for housing over the plan period. It is also considered that the Plan at Appendix 8 should include the individual phasing of sites to assist monitoring. <Full response attached></p>
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>We wish to appear at the examination to present our evidence and technical information to support these representations</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>

Appendix 9 Glossary

Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Bookmark	Saunderson, Paula
Consultee Full Name	Paula Saunderson
Consultee Organisation	
Agent Full Name	
Agent Organisation	
Comment ID	PS910
Chapter / Policy / Appendix Number	Appendix 9
Chapter / Policy / Appendix Title	Glossary
Order	231
Submission Type * E-Mail * Letter * Other * SMS * Web * Unknown	E-Mail
Response Date	28/02/2023 16:51:00
Attached Files	Paula Saunderson_Full LPR Response_REDACTED.pdf
1. Do you consider the Local Plan Review is legally compliant? * Yes * No	
Please give reasons for your answer	
2. Do you consider the Local Plan Review is sound? - Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. * Yes * No	No
2. Do you consider the Local Plan Review is sound? - Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. * Yes * No	No

<p>2. Do you consider the Local Plan Review is sound? - Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. * Yes * No</p>	<p>No</p>
<p>Please give reasons for your answer</p>	<p><i>See attachment 'Paula Saunderson - Full LPR Rep' for full consultation response. Comments on each chapter/policy can be found at the specific consultation point.</i></p> <p>APPENDICES</p> <p>No time to review in Detail but a general comment is the lack of maps within documents and the lack of ability to pull together data for a Specific Spatial Area and important Sub Areas.</p> <p>The Glossary of Terms (GOT) fails to include some frequently used terms such as:</p> <ul style="list-style-type: none"> • Rural -the list of those Designated should be included somewhere • Countryside • Heritage • Green Gaps • Designated Employment Areas -even though they have their own Appendix • Residential Parking Zones – has own Appendix so should be in GOT • etc.
<p>3. Do you consider the Local Plan Review complies with the Duty to Co-operate? * Yes * No</p>	
<p>Please give reasons for your answer</p>	
<p>4. Proposed Changes</p>	
<p>5. Independent Examination - If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? * Yes * No</p>	<p>Yes</p>
<p>5. Independent Examination</p>	<p>I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.</p>
<p>6. Notification of Progress of the Local Plan Review - The submission of the Local Plan Review for Independent Examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The publication of the report of the Inspector appointed to carry out the examination * Yes * No</p>	<p>Yes</p>
<p>6. Notification of Progress of the Local Plan Review - The adoption of the Local Plan Review * Yes * No</p>	<p>Yes</p>